

UNITED KINGDOM CANDIDATE PRIVACY NOTICE

1. ABOUT THIS PRIVACY NOTICE

1.1 As part of any recruitment process, Golub Capital Europe LLP (as your prospective employer) and Golub Capital LLC (as head office involved in recruitment decisions) (**Golub, we, us, our**) collect and process personal data relating to candidates. This Privacy Notice sets out how we process that personal data. We are **joint data controllers** which means we are jointly responsible for deciding how we hold and use personal data about you. We have determined that Golub Capital LLC will usually be responsible for our obligations under the UK General Data Protection Regulation.

1.2 By **personal data** we mean any information relating to you such as your name or contact details. Personal data does not include data which has been anonymised, such as data from equal opportunities monitoring carried out on an anonymised basis.

1.3 Should you have any questions about this Privacy Notice you can contact us at compliance@golubcapital.com.

2. WHAT INFORMATION DO WE COLLECT ABOUT YOU AND WHAT DO WE USE IT FOR?

2.1 The types of personal data about you which we may collect, store and use are set out in the table below and in each case we have specified the purpose and our 'lawful basis' for processing it. The law specifies certain 'lawful bases' for which we are allowed to use your personal data. Most commonly, we will rely on one or more of the following lawful bases for processing your personal data:

- (a) where it is necessary for **compliance with a legal obligation** to which we are subject; and/or
- (b) where it is necessary for the purposes of the **legitimate interests** pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms, which require protection of your personal data.

2.2 Where Golub relies on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of candidates and have concluded that they are not.

Category of personal data	Examples	Purpose	Lawful basis for processing	Legitimate interest (where applicable)
Contact details	Name, address, email address and telephone number	For administration purposes during the recruitment process	Legitimate interests To take steps prior to entering and to enter a contract with candidates	To make contact with candidates during recruitment process

Application related documents provided by candidates	Application form, CV, covering letter and photograph if provided	To assess candidate's suitability for the role and to keep records relating to our recruitment process	Legitimate interests	To make recruitment decisions and maintain standards of integrity and excellence in Golub's workforce
Application documents generated by Golub	Assessment results (including technical exercises), feedback and notes from interviews, references and reference check information or other selection processes	To assess the candidate's application and make recruitment decisions, and to keep records relating to our recruitment process	Legitimate interests	To make and justify recruitment decisions and maintain standards of integrity and excellence in our workforce
Details about current remuneration	Current level of salary and benefit entitlements	To make decisions about the financial package on offer	Legitimate interests	To ensure appropriate and attractive financial packages are offered to candidates

3. SPECIAL CATEGORIES OF PERSONAL DATA

3.1 Some personal data is more sensitive and requires a higher level of protection. This is personal data which reveals or contains:

- (a) racial or ethnic origin;
- (b) political opinions;
- (c) religious and philosophical beliefs;
- (d) trade union membership;
- (e) genetic data;
- (f) biometric data;
- (g) health data; and
- (h) sex life or sexual orientation.

3.2 We will process special category personal data because we have a lawful basis for doing so and primarily because it is necessary:

- (a) for the purposes of carrying out our obligations and exercising specific rights in the field of employment law (**employment law obligations**); and/or
- (b) for the assessment of your **working capacity**.

3.3 However, in limited circumstances we may be required to process special category data from candidates to respond to and defend **legal claims**.

3.4 The special categories of data about you which we may collect, store and use are set out in the table below and in each case we have specified the purpose and our ‘lawful basis’ for processing it.

Category of special categories of personal data	Examples	Purpose	Lawful basis for processing
Medical/health information provided as part of application process	Details relating to any disability	To make reasonable adjustments to the recruitment process	Compliance with legal obligations and employment law obligations
Immigration information	Passport, driving licence, visa, work permit	To check your right to work in the UK	Compliance with legal obligations and employment law obligations
Information for equal opportunities monitoring	Race/ethnicity, sexual orientation, religion/philosophical belief and disability	To allow us to monitor equal opportunities	Compliance with legal obligations and employment law obligations

3.5 We do not require you to provide any special categories of personal data other than those outlined in the table above. We recommend that you do not include any additional special categories of personal data in your application as it is unlikely to be relevant to the application process.

4. INFORMATION RELATING TO CRIMINAL CONVICTIONS AND OFFENCES

4.1 Information about criminal convictions and offences requires a higher level of protection than general personal data. We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out legal or other obligations and provided we do so in line with our data protection policy.

4.2 We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. We may collect information about your criminal convictions history if we have made a decision to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We may be required or entitled to carry out a criminal records check in order to check that there is nothing in your criminal convictions history which makes you unsuitable for the role.

4.3 We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

4.4 Please note that we may use or disclose information provided if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

Category	Examples	Purpose	Lawful basis for processing
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Information about criminal convictions and offences	Disclosure and Barring Service checks or equivalent overseas	Criminal records checks to assist with assessments which form part of generally accepted principles of good practice in the industry	Legitimate interests and Data Protection Act 2018, Schedule 1 condition - necessary to comply with a regulatory requirement
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5. WHAT IF YOU DO NOT PROVIDE THE PERSONAL DATA WE REQUEST?

You are not under any statutory or contractual obligation to provide any data which Golub requests during the recruitment process. However, if you do not provide the information, we may not be able to take your application further. We will notify you if this is the case.

6. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it (as identified under *Purpose* above), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

7. ADDITIONAL SOURCES OF INFORMATION

In addition to the data we collect from you during the recruitment process, we may receive personal information about you from third parties, such as:

- (a) recruitment consultants;
- (b) background check agencies, including the Disclosure and Barring Service or equivalent overseas, who search anti-money laundering watchlists and databases of regulatory bodies such as the Financial Conduct Authority;
- (c) former employers and any other named referees;
- (d) the Financial Conduct Authority or other relevant regulation or professional body; and
- (e) publicly accessible sources such as the media and social media.

8. WITH WHOM WILL WE SHARE YOUR INFORMATION?

8.1 Your information will be shared internally including with other entities in our group for the purposes of the recruitment process. This includes members of the HR and recruitment team, interviewers and managers in the business area to which the vacancy relates.

8.2 Golub will not share your data with external third parties, unless your application for employment is successful and it makes you an offer of employment. Golub will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks. We may share your personal data with third parties, for example with a regulator or otherwise to comply with the law.

8.3 We may transfer the personal data we collect about you to the United States as this is where Golub Capital LLC (and some of our other service providers described above) is based, for the purposes described above. This means that your data may be transferred to countries where there is not an adequacy decision which means those countries are not deemed to provide an adequate level of protection for your personal information.

8.4 Where required, we have put in place standard contractual clauses to ensure that your personal data is treated in a manner that is consistent with and respects the EU and UK laws on data protection. If you require further information about this, you can request it from compliance@golubcapital.com.

9. FOR HOW LONG DOES GOLUB KEEP DATA?

9.1 If your application for employment is unsuccessful, Golub will hold your data on file for such time as advisable by applicable law or regulation after the end of the relevant recruitment process. At the end of that period, your data will be deleted or securely destroyed in accordance with our records retention policy.

9.2 If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment and thereafter for such time as advisable by applicable law or regulation.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

10. YOUR RIGHTS IN RELATION TO YOUR INFORMATION

10.1 You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- (a) request **access** to your personal data (commonly known as a **data subject access request**) and request certain information in relation to its processing;
- (b) request **rectification** of your personal data;
- (c) request the **erasure** of your personal data;
- (d) request the **restriction** of processing of your personal data; and
- (e) **object** to the processing of your personal data.

10.2 If you want to exercise one of these rights, please contact us at compliance@golubcapital.com. You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Fees

10.3 You will not usually have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

10.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is to ensure that personal data is not disclosed to any person who has no right to receive it.

11. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact compliance@golubcapital.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless we now have an alternative legal basis for doing so.

12. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available at <https://golubcapital.com/careers/> and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

13. FURTHER INFORMATION

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact compliance@golubcapital.com.