

## EFFECTIVE DATE: 8 October 2024

This Privacy Notice, which is effective as of 8 October 2024, amends the prior version which was effective as of 1 January 2021.

The changes made by this Privacy Notice can be found here.

# PRIVACY NOTICE REGARDING APPLICANT PERSONAL DATA PROCESSED BY OUR UK, EU AND SWITZERLAND OFFICES

#### (RECRUITMENT PRIVACY NOTICE)

This Privacy Notice sets out the following information:

- 1. Identification of the Data Controller;
- 2. Contact Details of our Data Protection Officer ("DPO";
- 3. Sources of Personal Data;
- 4. <u>Categories Of Personal Data Processed, Purposes and Legal Basis For The Firm's Processing;</u>
- 5. Retention of Personal Data;
- 6. How We Share Your Data within the Firm and with Third Parties;
- 7. International Transfers of Persona Data; and
- 8. Rights of Individuals in Relation to their Personal Data;
- 9. Definitions

#### INTRODUCTION

This Privacy Notice describes the ways in which Squire Patton Boggs ("the Firm," "we", "us") processes and protects the personal data of prospective partners and employees<sup>1</sup> (collectively, "Applicants") who submit applications for consideration and processing by any of our United Kingdom ("UK"), European Union ("EU") and Switzerland offices or affiliated legal entities ("our UK, EU

More information [1]

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<sup>&</sup>lt;sup>1</sup> Solely for the purposes of this Privacy Notice, the term "Applicant" may also be construed to include individuals applying to provide us with relevant services as independent contractors or consultants.



and Switzerland Offices") in accordance with Applicable Data Protection Law.

#### 1. IDENTIFICATION OF THE DATA CONTROLLER

More information [2]

The relevant data controller for your personal data is the Squire Patton Boggs UK, EU or Switzerland Office to which you have submitted your application.

Compliance with Applicable Data Protection Laws for our UK, EU and Switzerland Offices is centrally managed and supervised by Squire Patton Boggs (UK) LLP, 60 London Wall, London EC2M 5TQ, England.

# 2. CONTACT DETAILS OF OUR DATA PROTECTION OFFICER

More information [3]

By post: Data Protection Officer

60 London Wall London EC2M 5TQ

England

By email: <u>DataProtectionOfficer@squirepb.com</u>

### 3. **SOURCES OF PERSONAL DATA**

More information [4]

We generally obtain personal data concerning Applicants from three sources, as discussed below.

Categories of Personal Data	Source
Your contact information, information about your experience and qualifications and other information relevant to the recruitment process and the position for which you are applying	Provided by you electronically, in writing, or verbally  OR
	Provided by the recruitment agency with which you are associated
Evaluations from interviews in which you participate	Provided by those who have interviewed you
Recorded video interviews, written questions and answers and skills tests that we administer and evaluate	Digital platforms hosted by third parties



Categories of Personal Data	Source
Background screening and other pre-employment checks, as permitted or otherwise authorised by applicable laws	Third-party service providers who collect your personal data directly from you, for example, digital identity service providers to verify your identity and perform Right to Work checks.  Where you provide personal data directly to third parties, you should ensure you also review their privacy and data protection notice.
References	Referees that you authorise us to contact
Other personal and professional information	Public areas of third-party professional social networks and websites, for example LinkedIn, Xing or professional directories

# 4. CATEGORIES OF PERSONAL DATA PROCESSED, PURPOSES AND LEGAL BASIS FOR THE FIRM'S PROCESSING

The Firm processes your personal data to carry out its recruitment activities in order to attract new talent to the Firm, including partners, associates and staff as well as independent contractors and consultants.

Our legal basis for doing so will vary with the type of data processing activity involved.

More information [5]

The Firm will not take responsibility for any personal data provided by you that is outside the requested or permitted range of personal data. For example, where special categories of personal data are not requested or relevant to the position, we will decline to process the data and delete it from our system.

To the extent not addressed below, we will point out, at the time of data collection, if the processing of your personal data by the Firm is a statutory or contractual requirement, whether you are obligated to provide the personal data and the possible consequences of your failure to do so. In circumstances where consent is the basis for the Firm to process your personal data, we will request this from you at the point of data collection.

The categories of personal data that the Firm processes about you, for the purpose of recruitment, include the following:



Initial Screening of Applications (All UK, EU and Switzerland Offices)			
Categories of personal data:	We may use your personal data to:	Our lawful basis under the GDPR for doing so is:	Our legitimate interests in doing so are to:
Identification data (i.e. name, mobile telephone number, email address).	Contact you about your application to us.	Article 6(1)(f):Legitimate interests.	Allow appropriate assessment of applications and selection of suitable Applicants for roles with the Firm.
CV/Résumé (or profile on professional social networks or websites), details of your qualifications and experience, employment history (including job titles, salary and benefits packages and any relevant working hours), interests, information about your academic history, qualifications including professional certifications and credentials, language skills.	Consider your qualifications, skills and experience to ensure they are suitable for the position.	Article 6(1)(f): Legitimate interests.	Allow appropriate assessment of applications and selection of suitable Applicants for roles within the Firm.

Further Data Which May Be Requested During Applicant Assessment and Selection (All UK, EU and Switzerland Offices)			
Categories of personal data:	We may use your personal data to:	Our lawful basis under the GDPR for doing so is:	Our legitimate interests in doing so are to:
Detailed evidence of your relevant skills and details of your previous experiences and the	Consider your suitability for the position.	Article 6(1)(f): Legitimate interests.	Allow selection of suitable Applicants for vacancies within the Firm.



# Further Data Which May Be Requested During Applicant Assessment and Selection (All UK, EU and Switzerland Offices)

(All OK, LO and Owitzerland Offices)			
Categories of personal data:	We may use your personal data to:	Our lawful basis under the GDPR for doing so is:	Our legitimate interests in doing so are to:
career choices you have made (usually assessed at a faceto-face or telephone interview).			
Video recording of your responses to interview questions using our digital assessment platform	Consider your suitability for the position	Article 6(1)(a): Consent.	N/A
Residential addresses (current and, in some cases, previous) and background checks.	Consider your background and history.	Article 6(1)(f): Legitimate interests.	Assessment of senior hire's suitability for the position.
For more senior fee earning Applicants: details of prior and, where pertinent, projected client base and activity including details of acting for any parties that are adverse to our Firm or its predecessor firms.	Evaluate the business case and consider whether potential clients might pose a conflict of interest.	Article 6(1)(f): Legitimate interests.	Assessment of senior hire's suitability for the position.
For more senior fee earning Applicants: details of ownership interests in any client.	Consider whether your personal business interests are compatible with those of the Firm.	Article 6(1)(f): Legitimate interests.	Assessment of senior hire's suitability for the position.
Details of bar admissions and	Consider your suitability for the position.	Article 6(1)(c): Legal obligation.	N/A



#### Further Data Which May Be Requested During Applicant Assessment and Selection (All UK, EU and Switzerland Offices) Categories of Our lawful basis We may use Our legitimate interests your personal under the GDPR personal data: in doing so are to: data to: for doing so is: relevant reference numbers. Article 6(1)(f): For the most senior Review your Ensure that senior profiles profiles (Partners): financial history Legitimate available for employment information relating and history (data interests. within the firm are to the Candidate's shared with U.S. qualified and able to take and UK offices) possible on financial involvement in responsibilities administrative proceedings, insolvency proceedings, arbitration proceedings or before the courts

Further Data Which May Be Requested Prior to Start of Employment (All UK,EU and Switzerland Offices)			
Categories of personal data:	We may use your personal data to:	Our lawful basis under the GDPR for doing so is:	Our legitimate interests in doing so are to:
References from clients (for senior hires only).	Consider your suitability for the position	Article 6(1)(f): Legitimate interests.	Assessment of senior hire's suitability for the position
Copy of your passport or other government-issued identity documents.	Ensure that you have the right to work in the country you have applied to work in.	Article 6(1)(c): Legal obligation.	N/A



# UK OFFICES ONLY: ADDITIONAL CATEGORIES OF PERSONAL DATA PROCESSED

In the UK only, we request and collect special categories of personal data and other personal data from job applicants or partner candidates in order to:

- monitor the impact of the Firm's diversity and inclusion initiatives;
- satisfy our legal and regulatory diversity reporting obligations;
- make any reasonable accommodations you may require due to a disability so you may participate fully in the recruitment process; and/or
- · comply with anti-money laundering regulations.

If you are applying for a position in one of our UK locations, please see Annex 1 for information about the personal data we collect for these purposes.

#### 5. **RETENTION OF PERSONAL DATA**

The Firm retains your personal data for the period necessary to fulfil the purposes set out in this Privacy Notice or as required by applicable law or in order to establish, exercise or defend potential legal claims or to pursue our legitimate interests.

More information [6]

# 6. HOW WE SHARE YOUR PERSONAL DATA WITHIN THE FIRM AND WITH THIRD PARTIES

#### 6.1 *Intra-Group*

Relevant personal data of Applicants is shared with authorized Firm personnel in and outside of the UK, the EU and Switzerland.

Purpose of the Transfers		Recipients
Facilitate interviews with Firm personnel involved in the hiring decision	More information [7]	Authorized Firm personnel including selected interviewers as relevant to a particular position
Administering the hiring and compensation policies in a fair and coordinated manner across all of our offices and practice groups worldwide		Relevant HR and Finance personnel and others involved in managing the Firm



Purpose of the Transfers	Recipients
Gain approval to make individual hires	The Firm's internal management platform hosted by the Firm in the United States
Communications and general business management	Email systems, conflict management systems, finance systems, and HR management systems that are hosted by the Firm on servers located in the UK and in the United States.

#### 6.2 Third Parties

Our UK, EU and Switzerland Offices also share the personal data of Applicants with trusted service providers pursuant to contractual arrangements with them, which will include appropriate safeguards to protect any personal data that we share with them.

Purpose of the Transfers	Recipients (examples)
Manage the recruitment process	IT service providers, talent management software providers, HR information systems and referencing and background check firms.
Provide services to you and, in some cases, your family members	The Firm's business partners, acting as independent data controllers, such as recruitment agencies; accountants; banks involved in processing expense reimbursements; telecommunications and conference companies; relocation firms; travel agencies, hotels, airlines, car rental agencies and other companies involved in providing corporate travel services.

#### 7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

## 7.1 Intra-Group

Due to the global nature of our operations, your personal data may be transferred to and shared with authorised Firm personnel in offices outside the UK, EU and Switzerland. The transfers are protected by means of international data transfer More information [8]



agreements that incorporate contractual safeguards approved by the relevant data protection regulator.

#### 7.2 Third Parties

Some of the third parties with which we share your personal data are located outside the UK, EU/EEA and Switzerland. Unless the recipients are located in countries that have been deemed adequate by the relevant data protection regulator, we will ensure that appropriate safeguards are in place before making the transfer.

More information [9]

#### 8. RIGHTS OF INDIVIDUALS IN RELATION TO THEIR PERSONAL DATA

The Applicable Data Protection Laws provide certain rights to data subjects in relation to their personal data. These include the rights to:

More information [10]

Access	Request details about and a copy of the personal data we hold about them.	More information [11]
Rectification	Correct or update their personal data.	
Portability	Port personal data that the data subject has provided to us, in machine readable format.	
Erasure	Erase the data that we hold about them.	More information [12]
Restriction	Restrict processing in some cases.	More information [13]
Objection	Object to processing in some cases.	More information [14]
Consent	Decline to consent or withdraw consent.	More information [15]

To assist us in complying with our obligation to maintain the accuracy of your personal data, please notify us in writing of any changes to your personal data by updating your information using the Recruitment Platform or contacting the Resourcing Team. Where you have notified us or we otherwise become aware of an inaccuracy in your information, we will take appropriate steps to rectify the inaccuracy.

Any individual wishing to assert his or her rights under the Applicable Data Protection Law should address the relevant request to:

More information [16]

By post: DSAR Manager

Squire Patton Boggs (UK) LLP

Room 4.65

6 Wellington Place



Leeds LS1 4AP England

By email: <u>DataSubjectRequests@squirepb.com</u>

Further information and a form that you can use at your discretion to exercise your rights may be downloaded using this <u>link</u>.

You also have the right to submit a complaint concerning the processing of your personal data to the appropriate supervisory authority.

## 9. **DEFINITIONS**

Applicable Data Protection Law	means the EU GDPR, the FADP, the UK GDPR, the UK Data Protection Act 2018 and any national laws governing the protection of personal data as many be amended from time to time.
Applicant	as defined in the Introduction to this Privacy Notice.
Data Controller or Controller	means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
DSAR	means Data Subject Action Request, relating to the rights of data subjects under the Applicable Data Protection Law.
Employee	includes full-time employees, part-time employees, temporary employees, reinstated employees, rehired employees and retired and former employees.
EU	means the European Union or, where relevant in the given context, the European Economic Area.
EU GDPR	means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance).
EU SCCs	means the standard contractual clauses as approved by the European Commission ("EC") pursuant to its decision 2021/914 of 4 June 2021, as may be amended by the EC from time to time.
FADP	means the 235.1 Federal Act of 25 September 2020 on Data Protection in Switzerland.
GDPR	means the EU GDPR and/or the UK GDPR, as applicable.



Personal Data	means any information relating to an identified or identifiable natural
	person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Processing	means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means (e.g., computers), such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Partner	means an individual authorised by the Firm to use the title of partner.
Potential Personnel	means (for the purposes of this Privacy Notice) potential employees and/or partners, as well as independent contractors or consultants.
Recipient	means an individual or entity to whom or to which personal data are transmitted or disclosed.
Recruitment Platform	means a dedicated, online talent management platform provided by cvMail/Thomson Reuters.
Special Categories of Personal Data	means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data (for the purpose of uniquely identifying a natural person), data concerning health or data concerning a natural person's sex life or sexual orientation.
Swiss Addendum	means the Swiss addendum to the EU Standard Contractual Clauses set out in the Annex of Commission Implementing Decision (EU) 2021/914 of 4 June 2021 as recognised and adopted by the Federal Data Protection and Information Commissioner ("FDPIC"), as may be amended by the FDPIC from time to time.
Switzerland	means the Swiss Confederation.
UK	means the United Kingdom of Great Britain and Northern Ireland.
UK Addendum	means the International Data Transfer Addendum to the EU SCCs issued by the UK Information Commissioner's Office ("ICO") under section 119A(1) of the Data Protection Act 2018 as may be amended by the ICO from time to time.



UK GDPR	means the EU GDPR as it forms part of the law of the United				
	Kingdom of Great Britain and Northern Ireland by virtue of section 3				
	of the European Union (Withdrawal) Act 2018.				



## **MORE INFORMATION**

[1]	Squire Patton Boggs are a global law firm operating under a Swiss verein structure that comprises Squire Patton Boggs (UK) LLP, Squire Patton Boggs (US) LLP and other constituent legal entities. A full description of our organisation can be found on the Legal Notices page on our website.  As a law firm, we take our responsibilities and obligations to protect the personal data of our potential personnel very seriously. We have a robust information security management program in place to protect the personal data and other information that we process and have achieved ISO:27001 certification of the Firm's technical and organisational controls across a broad spectrum of systems and processes. These measures	<u>Back</u>
	are monitored, reviewed and regularly enhanced in order to meet our professional responsibilities and the needs of our clients.	
[2]	Our UK, EU and Switzerland Offices form part of, or are otherwise associated with Squire Patton Boggs (UK) LLP or Squire Patton Boggs (US) LLP. A list of each of the Firm's UK, EU and Switzerland Offices, the associated Squire Patton Boggs partnership and relevant contact details are provided in <a href="Manage-Patton-Annex 2">Annex 2</a> to this Privacy Notice.	<u>Back</u>
	Our UK,EU and Switzerland Offices operate as joint controllers in regard to some processing activities relating to the personal data of Applicants, and each of our UK, EU and Switzerland Offices is responsible for making this Privacy Notice accessible to Applicants for positions with their offices or other offices of the Firm. Our UK, EU and Switzerland Offices will collaborate with one another and with other offices of the Firm, as necessary, to address requests by data subjects to exercise their rights under Applicable Data Protection Law, as set out in Section 8.	
[3]	Squire Patton Boggs has elected to appoint a Data Protection Officer ("DPO") who acts on behalf of all of our UK, EU and Switzerland Offices to support the Firm's compliance efforts in relation to the processing of personal data concerning potential personnel, clients and business contacts.	<u>Back</u>
	Please direct all general communications or queries relating to this Privacy Notice or the Firm's compliance with Applicable Data Protection Law to our DPO. With regard to the exercise of data subject rights, a specific email address is provided in <a href="Section 8">Section 8</a> for the convenience of individuals wishing to submit a data subject request.	
[4]	So far as is possible, we use the Recruitment Platform to collect and process applications of Applicants for available positions in the Firm. This Recruitment Platform enables us to manage the personal data of Applicants and share it with relevant personnel within the Firm in a secure fashion and in accordance with our obligations under Applicable Data Protection Law. We use the Recruitment Platform primarily to structure, store and enable the sharing of any personal data that you provide us	<u>Back</u>



	within the Firm, as appropriate. It does not involve any decision-making about Applicants based solely on automated processing or profiling.								
	We also sometimes use email to process applications for available positions in the Firm where technically necessary. This assists us in collecting the personal data of Applicants where use of the Recruitment Platform is not available and in managing certain practical aspects of our data processing, such as organising interviews and receiving evaluation information.								
[5]	Our lawful basis for collecting personal data as part of the recruitment process will typically include:	<u>Back</u>							
	where necessary for the Firm to carry out its responsibilities under the partnership agreement or employment contract which we are discussing and/or negotiating with you;								
	where necessary for the Firm to pursue its legitimate interests or those of our clients, provided that those interests are not overridden by your interests, fundamental rights and freedoms;								
	where necessary for the Firm to comply with its legal obligations; or								
	on the basis of your consent.								
[6]	It is our general policy to retain potential personnel records until the end of Firm's recruitment process regarding your application, extended to cover the relevant statutory period or for the duration of any relevant legal proceedings. More specifically, your personal data will be retained as follows:	<u>Back</u>							
	If you submit your own personal data and are an unsuccessful Applicant:								
	<ul> <li>Our policy is to delete your personal data in its entirety after the expiration of 180 days following the conclusion of the recruitment process for the role for which you have applied, unless you tell us that you are happy for us to retain your data for a further 180 days in case a suitable opportunity arises in the future.</li> </ul>								
	If you apply via a third-party staffing or recruiting company and are an unsuccessful Applicant:								
	<ul> <li>Our policy is to delete your personal data after the expiration of 180 days following the conclusion of the recruitment process for the role for which you have applied, save that your name, email address and the name of the agency that submitted your name will be retained for 12 months.</li> </ul>								
	This is to enable us to meet our contractual obligations with the third-party staffing and recruiting company that referred you to us.								



We delete any introductory communications that we may have with you via social media sites, such as LinkedIn, within one month following of the close of our dialogue with you using such sites.  [7] Depending on the Applicant and the open position for which they are applying, personal data may be shared globally as relevant, including with members of the Global Board, the Legal Personnel Committee, the relevant Practice Group Leader or the Director of business unit, the Office Managing Partner, and/or the relevant Industry Group Leader.  [8] The Firm's intragroup data transfer agreement incorporates the EU SCCs, the UK Addendum and the Swiss Addendum. You may request a copy of the Firm's EU SCCs, UK Addendum or Swiss Addendum by contacting the DPO as indicated in Section 2 above.  [9] When transferring personal data to third parties in countries that do not have an adequacy designation from the relevant data protection regulator, we typically put in place data transfer agreements based on the EU SCCs, the UK Addendum or the Swiss Addendum, as applicable, or rely on other available data transfer mechanisms (e.g., Binding Corporate Rules or approved Certifications or Codes of Conduct) to protect personal data that is transferred to recipients outside the EU. In exceptional cases, we may rely on statutory derogations for international data transfers. You may request a copy of the Firm's EU Standard Contractual Clauses or other relevant international transfer documentation by contacting the DPO as indicated in Section 2 above.  [10] These rights are not absolute and are subject to various conditions under Applicable Data Protection Law.  In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 4 of this Privacy Notice in relation to your potential employment or partnership with the Firm.  [11] The right of access does not apply when we are under lega	
applying, personal data may be shared globally as relevant, including with members of the Global Board, the Legal Personnel Committee, the relevant Practice Group Leader or the Director of business unit, the Office Managing Partner, and/or the relevant Industry Group Leader.  [8] The Firm's intragroup data transfer agreement incorporates the EU SCCs, the UK Addendum and the Swiss Addendum. You may request a copy of the Firm's EU SCCs, UK Addendum or Swiss Addendum by contacting the DPO as indicated in Section 2 above.  [9] When transferring personal data to third parties in countries that do not have an adequacy designation from the relevant data protection regulator, we typically put in place data transfer agreements based on the EU SCCs, the UK Addendum or the Swiss Addendum, as applicable, or rely on other available data transfer mechanisms (e.g., Binding Corporate Rules or approved Certifications or Codes of Conduct) to protect personal data that is transferred to recipients outside the EU. In exceptional cases, we may rely on statutory derogations for international data transfers. You may request a copy of the Firm's EU Standard Contractual Clauses or other relevant international transfer documentation by contacting the DPO as indicated in Section 2 above.  [10] These rights are not absolute and are subject to various conditions under Applicable Data Protection Law.  In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 4 of this Privacy Notice in relation to your potential employment or partnership with the Firm.  [11] The right of access does not apply when we are under legal obligation of professional secrecy or if granting access would infringe on the rights and freedoms of another individual.	
the UK Addendum and the Swiss Addendum. You may request a copy of the Firm's EU SCCs, UK Addendum or Swiss Addendum by contacting the DPO as indicated in Section 2 above.  [9] When transferring personal data to third parties in countries that do not have an adequacy designation from the relevant data protection regulator, we typically put in place data transfer agreements based on the EU SCCs, the UK Addendum or the Swiss Addendum, as applicable, or rely on other available data transfer mechanisms (e.g., Binding Corporate Rules or approved Certifications or Codes of Conduct) to protect personal data that is transferred to recipients outside the EU. In exceptional cases, we may rely on statutory derogations for international data transfers. You may request a copy of the Firm's EU Standard Contractual Clauses or other relevant international transfer documentation by contacting the DPO as indicated in Section 2 above.  [10] These rights are not absolute and are subject to various conditions under Applicable Data Protection Law.  In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 4 of this Privacy Notice in relation to your potential employment or partnership with the Firm.  [11] The right of access does not apply when we are under legal obligation of professional secrecy or if granting access would infringe on the rights and freedoms of another individual.	<u>Back</u>
have an adequacy designation from the relevant data protection regulator, we typically put in place data transfer agreements based on the EU SCCs, the UK Addendum or the Swiss Addendum, as applicable, or rely on other available data transfer mechanisms (e.g., Binding Corporate Rules or approved Certifications or Codes of Conduct) to protect personal data that is transferred to recipients outside the EU. In exceptional cases, we may rely on statutory derogations for international data transfers. You may request a copy of the Firm's EU Standard Contractual Clauses or other relevant international transfer documentation by contacting the DPO as indicated in Section 2 above.  [10] These rights are not absolute and are subject to various conditions under Applicable Data Protection Law.  In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 4 of this Privacy Notice in relation to your potential employment or partnership with the Firm.  [11] The right of access does not apply when we are under legal obligation of professional secrecy or if granting access would infringe on the rights and freedoms of another individual.	<u>Back</u>
Applicable Data Protection Law.  In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in <a href="Section 4">Section 4</a> of this Privacy Notice in relation to your potential employment or partnership with the Firm.  [11] The right of access does not apply when we are under legal obligation of professional secrecy or if granting access would infringe on the rights and freedoms of another individual.	Back
professional secrecy or if granting access would infringe on the rights and freedoms of another individual.	Back
[12] The right to graphic applies in some cases and only to the extent this is	Back
[12] The right to erasure applies in some cases and only to the extent this is not in breach of a legal obligation to which we are subject.	<u>Back</u>
[13] The right to restriction or objection applies in some cases, and only to the extent this is not in breach of a legal obligation of professional secrecy to which we are subject.	<u>Back</u>
[14] The right to object may be exercised:	Back



	<ul> <li>Based on grounds relating to the individual's particular situation, where the processing is based on the legitimate interest of Squire Patton Boggs or our clients; or</li> <li>Where personal data is being processed for direct marketing purposes.</li> </ul>				
[15] Where consent is the basis for processing their personal data, the individual may decline to give their consent, or withdraw consent to the processing at any time.					
[16] The Firm's response to data subject action requests ("DSARs") in regard to the exercise of their rights under Applicable Data Protection Law is overseen by an internal team consisting of the DSAR Manager, the Office of General Counsel, the DPO and other professionals needed to respond to the particular request.					



#### Annex 1: UK APPLICANTS ONLY - ADDITIONAL CATEGORIES OF PERSONAL DATA PROCESSED

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In the UK only, we request and collect special categories of personal data and other personal data from job applicants or partner candidates in order to:

- monitor the impact of the Firm's diversity and inclusion initiatives;
- satisfy our legal and regulatory diversity reporting obligations;
- make any reasonable accommodations you may require due to a disability so you may participate fully in the recruitment process; and/or
- comply with anti-money laundering regulations.

Any special category personal data you choose to provide is collected and processed in accordance with the UK Data Protection Act 2018 ("UK DPA").

	Additional Categories of Personal Data								
		Law	ful Basis for F	Processing					
Categories of personal data	Purpose of processing	Article 6 UK GDPR	Article 9/10 UK GDPR	UK DPA	Relevant legislation	Legitimate interests	Additional information		
Special Categories of Personal Data: Race/ ethnic origin, sexual orientation, religion or belief, disability status.	Monitor and measure the results of our Firm diversity, equity and inclusion programmes	Art. 6(1)(f): Legitimate interests.	Art. 9(2)(g): Necessary for reasons of substantial public interest.	Schedule 1, Part 2, Para 8: Monitoring equality of opportunity or treatment with a view to enabling such equality to be promoted or maintained	N/A	Promote and maintain a supportive, diverse and inclusive culture within the Firm	Providing this information is optional and will have no impact on our consideration of your application.		



	Additional Categories of Personal Data							
		Law	ful Basis for F	Processing				
Categories of personal data	Purpose of processing	Article 6 UK GDPR	Article 9/10 UK GDPR	UK DPA	Relevant legislation	Legitimate interests	Additional information	
	Comply with diversity and equality reporting requirements of the Solicitors Regulation Authority, HMRC and other relevant organisations	Art. 6(1)(c): Legal obligation.	Art. 9(2)(b): Legal obligation in the field of employment and social security and social protection law	Schedule 1, Part 1, Para 1 Carry out our obligations under employment, social security and social protection law	<ul> <li>Equality Act 2010</li> <li>Employment Rights Act 1996</li> <li>SRA diversity reporting requirements</li> </ul>	N/A		
Socio-economic indicators: Gender, age bracket, free school meals, name of secondary school, whether first in family to attend university,	Monitor and measure the results of our Firm diversity, equity and inclusion programmes.	Art. 6(1)(f): Legitimate interests.	N/A	N/A	N/A	Promote and maintain a supportive, diverse and inclusive culture within the Firm	Providing this information is optional and will have no impact on our consideration of your application.	
if primary carer for a child, if carer for others (including if	Comply with diversity and equality reporting requirements of the	Art. 6(1)(c):	N/A	N/A	Solicitors Regulation Authority	N/A		



	Additional Categories of Personal Data								
		Law	ful Basis for F	Processing					
Categories of personal data	Purpose of processing	Article 6 UK GDPR	Article 9/10 UK GDPR	UK DPA	Relevant legislation	Legitimate interests	Additional information		
registered carer), refugee and asylum seeker status.	Solicitors Regulation Authority and other relevant organisations.	Legal obligation.			diversity reporting requirements				
Special Categories of Personal Data: Data that may reveal concerning information about your health.	To be aware of any medical conditions for health & safety reasons when attending our office in person.  To make reasonable adjustments to enable a disabled person to participate fully in the recruitment process.	Art. 6(1)(c) Legal obligation.	Art. 9(2)(b): Legal obligation in the field of employment and social security and social protection law	Schedule 1, Part 1, Para 1 Carry out our obligations under employment, social security and social protection law	Health and Safety at Work Act 1974 Equality Act 2010 Employment Rights Act 1996	N/A	Providing this information will have no impact on our consideration of your application.		
Criminal Convictions Data: Presence or absence of unspent criminal	To comply with antimoney laundering regulations.	Art. 6(1)(c) Legal obligation.	Art. 10 As authorised	Schedule 1, Part 2, Para 12;	Money Laundering, Terrorist Financing and Transfer of	N/A	Only lateral partner candidates and candidates for		



Additional Categories of Personal Data								
		Law	ful Basis for F	Processing				
Categories of personal data	Purpose of processing	Article 6 UK GDPR	Article 9/10 UK GDPR	UK DPA	Relevant legislation	Legitimate interests	Additional information	
convictions recorded against your name by the Courts of England and Wales.		Art. 6(1)(f):	by the UK and Sc Part 3,  Regulat requirer relating unlawfu and disl  art. Art. 10 Schedu Part 2,	and Schedule 1, Part 3, Para 36  Regulatory requirements relating to unlawful acts and dishonesty  Schedule 1, Part 2, Para 12;	Funds (Information on the Payer) Regulations 2017, Article 21.	To screen for the conduct	certain positions in the Finance department require a criminal background check. The job description will inform you if the position requires a	
		Legitimate interests.	authorised by the UK DPA	and Schedule 1, Part 3, Para 36  Regulatory requirements relating to unlawful acts and dishonesty		and integrity of certain employees in the Finance department or incoming partners.	criminal check.  We will never request a criminal background check until a job offer has been accepted.	



	Additional Categories of Personal Data							
		Law	ful Basis for F	Processing				
Categories of personal data	Purpose of processing	Article 6 UK GDPR	Article 9/10 UK GDPR	UK DPA	Relevant legislation	Legitimate interests	Additional information	
Credit Checks: Including County Court Judgements (CCJ's), Bankruptcy, Bankruptcy Restriction Orders, Individual Voluntary Arrangements, Fast Track Voluntary Arrangements, Debt Relief Orders, Debt Restriction Orders, Decrees, Sequestration Orders, Notices of Correction.	To comply with antimoney laundering regulations.	Art. 6(1)(c) Legal obligation.	N/A	N/A	Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, Article 21.		Only lateral partner candidates and candidates for certain positions in the Finance department require a credit check. The job description will inform you if the position requires a credit check.  We will never request a credit check until a job offer has been accepted.	



	Additional Categories of Personal Data							
		Law	ful Basis for F	Processing				
Categories of personal data	Purpose of processing	Article 6 UK GDPR	Article 9/10 UK GDPR	UK DPA	Relevant legislation	Legitimate interests	Additional information	
	To safeguard client monies.	Art. 6(1)(f): Legitimate interests.	N/A	N/A	N/A	To screen for the conduct and integrity of certain employees in the Finance department.		



# Annex 2: BRANCH OFFICES AND LEGAL ENTITIES IN THE UK, EU AND SWITZERLAND

## Squire Patton Boggs (UK) LLP

60 London Wall London EC2M 5TQ England

Branch offices of Squire Patton Boggs (	UK) LLP
Squire Patton Boggs (UK) LLP Strawinskylaan 357 1077 XX Amsterdam Netherlands	Squire Patton Boggs (UK) LLP Rutland House 148 Edmund Street Birmingham B3 2JR England
Squire Patton Boggs (UK) LLP Avenue Louise 523 1050 Brussels Belgium	Squire Patton Boggs (UK) LLP 6 Wellington Place Leeds LS1 4AP England
Squire Patton Boggs (UK) LLP Plaza Marques de Salamanca 3-4, 7th Floor 28006 Madrid Spain	Squire Patton Boggs (UK) LLP No. 1 Spinningfields 1 Hardman Square Manchester M3 3EB England
Squire Patton Boggs (UK) LLP Piazza San Fedele n. 2 4th Floor 20121 Milan Italy	

## Squire Patton Boggs (US) LLP

60 London Wall London EC2M 5TQ England +44 20 7655 1000



Branch offices of Squire Patton Boggs (US) LLP	
Squire Patton Boggs (US) LLP Rechtsanwälte, Steuerberater und Attorneys-at-Law Unter den Linden 14 10117 Berlin Germany	Squire Patton Boggs (US) LLP Rechtsanwälte, Steuerberater und Attorneys-at-Law Herrenberger Straße 12 71032 Böblingen Germany
Squire Patton Boggs (US) LLP Avenue Louise 523 1050 Brussels Belgium	Squire Patton Boggs (US) LLP Rechtsanwälte, Steuerberater und Attorneys-at-Law Eurotheum, Neue Mainzer Straße 66-68 60311 Frankfurt am Main Germany
Squire Patton Boggs (US) LLP, Cleveland, Geneva Rue du Rhône 67 1207 Geneva Switzerland	

Other constituent legal entities	
Advokátska kancelária	Squire Patton Boggs s.r.o.,
Squire Patton Boggs s.r.o.	advokátní kancelář
Zochova 5	Václavské náměstí 813/57
811 03 Bratislava	110 00 Prague 1
Slovak Republic	Czech Republic
Haussmann Associés SELARL trading	Squire Patton Boggs Krześniak sp.k.
under the name Squire Patton Boggs	Warsaw Financial Center
7, rue du Général Foy	Emilii Plater 53
75008 Paris	00-113 Warsaw
France	Poland
Squire Patton Boggs Park Lane Limited Rutland House 148 Edmund Street Birmingham B3 2JR England	Squire Patton Boggs Ireland Suite 39.4 Ella House 39 – 40 Merrion Square East Dublin 2 D02 NP96 Ireland