

APPLICANT PRIVACY NOTICE

Last updated: 21 August 2018

1. Scope of application

This privacy notice ("**Notice**") applies to how WD-40 Company ("**WD-40 Company**", "**we**" or "**us**") processes your personal data. It also describes your data protection rights, including a right to object to some of the processing which WD-40 Company carries out. More information about your rights, and how to exercise them, is set out in Section 6 (Your Rights).

We may also provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

This Notice applies to WD-40 Company job applicants and, where applicable, to contractors who provide services to WD-40 Company.

2. What personal data we collect

WD-40 Company collects and processes the following types of personal data about you as the data controller in connection with your application:

- **Personal identification and communication information:** such as your name, home address, phone number, email address, employment eligibility status and if applicable video interview;
- **Application-related information:** curriculum vitae (CV), cover letter, employment history, education history, qualifications and skills, reference contact information, position preferences, willingness to relocate, desired salary, interests and aspirations, and background screening information if relevant to your role; and
- **Health information:** Where applicable, information about your physical and/or mental ability to perform the role and the need for possible accommodations.

3. Why we collect, use and store this personal data

WD-40 Company processes this personal data for the following purposes:

- **Where this is necessary for WD-40 Company to enter into an employment contract with you.**
 - To make informed decisions on recruitment and assess your suitability for the role.
 - To reimburse you for any agreed expenses incurred in the application process.
- **Where necessary to comply with a legal obligation.**
 - To assess your suitability in connection your engagement in a regulated role, where applicable.
 - To determine your right to work in the countries where you are applying for employment.
 - To disclose to law enforcement agencies or in connection with legal claims, health & safety compliance, regulatory and investigative purposes.
- **Where necessary for WD-40 Company's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights.**
 - To improve our recruitment process and activities.

- To verify the details you have supplied and conduct pre-employment background checks;
 - To contact you about future career opportunities at WD-40 Company.
 - Protecting our legitimate business interests and legal rights, including, use in connection with legal claims, compliance, regulatory, auditing and investigative (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
 - To analyse and monitor the diversity of the workforce in accordance with applicable laws. This includes, for example, compliance with equal opportunity employment laws.
- **Where you have given your consent.**
 - To collect medical information where a health check is required for the role.

Where we require the information to enter into an employment contract with you, or where we are required under applicable employment, social security, social protection or other laws applicable to us, the provision of information is mandatory. Where you do not provide your personal data to us, then we would be unable to enter into a contract with you or we may need to withdraw our offer of employment for certain roles, such as regulated roles. All other provision of your information is optional.

To ensure the most suitable applicants are placed in the right roles, iCIMS (the online career site you interfaced with during your application submission process) will automatically review the information you submitted and compare that information to a carefully constructed job description. Applicants whose data matches the description most closely will be submitted into a pool for further consideration. In no circumstances will any sensitive personal data be taken into considerations as part of this automated process.

4. Verification and background checks

For certain positions, it will be necessary for us to verify the details you have supplied (for example, in relation to your identity, employment history, academic qualification and professional credentials) and to conduct pre-employment background checks (for example, in relation to previous criminal convictions or financial standing). The level of checks will depend on your role, in particular whether you will occupy a regulated role, and will be conducted at as late a stage as is practicable in the recruitment process and often only after you have been selected for the position. If your application is successful, we will provide further information about the checks involved and will obtain any necessary consent prior to completing such checks.

5. How we share your personal data

We will share your personal data with the WD-40 Company, our parent company located in the United States for purposes set forth in Section 3.

Your personal data will be shared with companies providing services under contract to WD-40 Company as part of the recruitment process, such as background check companies.

Your personal data also will be shared with government authorities and/or law enforcement officials if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

In the event that a WD-40 Company business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business / business unit.

6. Your rights

You have the right to ask WD-40 Company for a copy of your personal data; to correct, delete or restrict processing of your personal data; and to obtain the personal data you provide in a structured, machine readable format. In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement). Where we have asked for your consent, you may withdraw consent at any time. If you ask to withdraw your consent to WD-40 Company processing your data, this will not affect any processing which has already taken place at that time.

There are exceptions to these rights, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office, the data protection authority in the United Kingdom located at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (calling from inside the UK dial: 0303 123 1113; calling from outside the UK dial +44 1625 545 700).

7. How long we retain your personal data

If you are successful: we will retain your personal data only for as long as we need it for WD-40 Company's legitimate interest in accordance with applicable law, for the purposes of the recruitment process and, once this process is finished, for an appropriate period so as to be able to deal with any legal claims linked to the application process. After this period which we will take steps to delete your personal data or hold it in a form that no longer identifies you. If you become a WD-40 Company employee, personal information you provide will become a part of your employee file and may be used later for the management of the employment relationship.

If you are not successful: we will retain your personal data for up to 24 months so we can keep you in mind for future recruitment processes. If you would prefer that we did not keep your details on file, please let us know.

More information about our retention policies is set forth in the WD-40 Company Data Retention Policy, which is available upon request.

8. International transfers

Your personal data will be processed in or accessed from jurisdictions outside the European Economic Area ("EEA") by members of WD-40 Company and our service providers (e.g. background screening providers) in jurisdictions that do not have equivalent data protection laws to those in the EEA for the purposes outlined above.

When we transfer your data to WD-40 Company in the United States we do so through the EU-US Privacy Shield (application and resulting certification is pending). When we transfer your data to organisations outside WD-40 Company we use European Commission-approved standard contractual clauses to safeguard the transfer, unless we transfer personal data to a third party that has implemented Binding Corporate Rules or which uses the Privacy Shield, in which case we may rely on one of those mechanisms to safeguard the transfer. For further information, including how to obtain a copy of the documents used to protect your information, please contact us as described in the Contact Us section below.

9. Updates to this Privacy Notice

This Notice may be updated periodically. We will update the date at the top of Notice accordingly. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Notice, as required by applicable law.

10. Contact us

If you have questions about this Notice or wish to contact us for any reason in relation to our personal data processing, please contact dataprivacy@wd40.co.uk.

Version history

| Version History | | | |
|-----------------|--------------|---------------|-----------|
| 1.0 | 21 August 18 | Karla Pinckes | Finalized |