

## CABOT CORPORATION CANDIDATE FAIR PROCESSING NOTICE

### Contents

#### 1. What is this document and why should you read it

1.1 This privacy notice explains how and why the Cabot group company with which you are applying for employment uses personal data about individuals who apply for employment with us as directly-employed staff, contractors, consultants and temporary or agency workers (referred to as "you"). When we refer to "Cabot", "we", "our" and "us", we are referring to the relevant company in the Cabot group that receives your job application and/or interviews or otherwise communicates with you in relation to a role within that Cabot group company and is therefore responsible for processing your personal data. The names of the relevant Cabot group companies can be found on **Schedule 5**.

1.2 You should read this notice so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you that might apply to our use of your personal data in specific circumstances in the future.

1.3 This notice does not form part of any contract that we have, or may enter into, with you.

#### 2. Cabot's data protection responsibilities

2.1 "Personal data" is any information that relates to an identifiable natural person. Your name, address, contact details and CV are all examples of your personal data, if they identify you.

2.2 The term "process" means any activity relating to personal data, including, by way of example, collection, storage, use and transmission.

2.3 Cabot is a "controller" of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data, and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws.

#### 3. What types of personal data do we collect, and where do we get it from?

3.1 We cannot administer our relationship with you, or your application for a role with us, without your personal data. We collect many different types of personal data about you for a variety of reasons. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields in our application are optional and can be left blank.

3.2 Further details about the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.

3.3 You provide us with personal data directly when you apply for a job with us, when you complete our application or correspond with us and in the course of any recruitment interview or assessment. We also create some personal data ourselves and obtain some personal data from other people and organisations, including some public sources (such as publicly available directories and online resources) and references you provide. You can read more about the sources of personal data in the more detailed information set out in **Schedule 1**.

3.4 It is your responsibility to make sure the personal data you provide to us is complete and accurate, and you must help us to keep it accurate and up to date. If any of the personal data you have given to us changes, such as your contact details, please update your information without delay by logging in to Cabot's recruiting portal and updating your personal data there or by contacting a member of our talent acquisition team at [recruiting@cabotcorp.com](mailto:recruiting@cabotcorp.com).

#### 4. What do we do with your personal data, and why

4.1 We process your personal data for particular purposes in connection with your application for a role with us and recruitment processes.

4.2 We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. There are **six** such permitted lawful basis for processing personal data. The table at **Schedule 2** provides information about the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

4.3 Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:

4.3.1 necessary for us to comply with a legal obligation; or

4.3.2 necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it

and if you choose not to provide the relevant personal data to us, we may not be able to continue our engagement with you or enter into a contract of employment with you.

4.4 We may use automated decision making to screen candidates for some job positions. For example, we may ask you to respond “yes” or “no” to questions asking for particular experience. Your application may be removed from consideration based on your response. If you think your application was improperly screened, you may contact us at [recruiting@cabotcorp.com](mailto:recruiting@cabotcorp.com).

4.5 We may also convert your personal data into statistical or aggregated form, or de-identify it, to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand who applies for our roles, the locations of applicants, the stage in the recruitment process, and the percentage of applicants who are hired.

## 5. **Special category personal data (including criminal data)**

5.1 We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and additional different lawful bases apply to them. **Schedule 3** describes the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances. We have included criminal related data in this category.

## 6. **Who do we share your personal data with, and why**

### *Inside the Cabot Group*

6.1 We are part of the Cabot group of companies. Therefore, we may need to share your personal data with other companies in the Cabot group to consider your application with relevant hiring managers and teams, to forward your application for consideration for roles with other Cabot companies if applicable, for authorisations/approvals with relevant decision makers, for providing reports and information to the Cabot group’s local, regional and global management about our hiring processes, and where systems and services are provided on a shared basis.

6.2 Where any Cabot group company processes your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them, as well as safeguards to ensure the protection of your personal data if it is transferred from the European Economic Area (“EEA”) to a Cabot group company outside the EEA.

### *Outside the Cabot Group*

6.3 From time to time we ask third parties to carry out certain business functions for us, such as hosting a recruitment platform for us and hosting other internal communication platforms for us such as e-mail. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to third parties, we will make sure that they have appropriate security standards in place to make sure your personal data is protected, and we will enter into a written contract imposing appropriate security standards on them.

6.4 In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

6.4.1 if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and

6.4.2 if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

6.5 We are likely to share your personal data with various recipients, including in particular:

- 6.5.1 third party service providers, notably assessment providers, occupational health specialists and recruitment agencies;
- 6.5.2 information technology support and services (for example, our online recruitment platform and remote hosting and management of other information technology and telecommunication applications);
- 6.5.3 consultants and professional advisors including legal advisors and accountants;
- 6.5.4 administrative authorities, courts and court-appointed persons/entities, law enforcement or regulatory bodies, arbitrators, experts, adverse parties and/or their advisors; and
- 6.5.5 governmental departments and statutory and regulatory bodies including data protection supervisory authorities

We may also share your personal data with third parties, as directed by you.

## 7. **Where in the world is your personal data transferred to?**

- 7.1 If any of our processing activities require your personal data to be transferred from within the EEA to outside the EEA, we will only make that transfer if:
  - 7.1.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
  - 7.1.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient. If you have questions about these contracts, please contact Cabot's global corporate personnel responsible for data protection at Cabot Corporation, Two Seaport Lane, Boston, MA 02210, U.S.A.; e-mail: [globaldataprotection@cabotcorp.com](mailto:globaldataprotection@cabotcorp.com); telephone: +1 (617) 345-0100; fax: +1 (617) 342-6256;
  - 7.1.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
  - 7.1.4 you explicitly consent to the transfer.

## 8. **How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage and have adopted policies and procedures for this purpose.

## 9. **How long do we keep your personal data for?**

- 9.1 We will keep your personal data during the recruitment process and then, after it ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.
- 9.2 We will only retain your personal data for a limited period of time in accordance with the Cabot record retention policy in your jurisdiction from time to time. This period will depend on a number of factors, including:
  - 9.2.1 any laws or regulations that we are required to follow;
  - 9.2.2 whether we are in a legal or other type of dispute with each other or any third party;
  - 9.2.3 the type of information that we hold about you; and
  - 9.2.4 whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.
- 9.3 If we do not hire you, unless the Cabot record retention policy in your jurisdiction requires that we retain your data for a different period of time, we will retain your personal data for 12 months from the date of application to consider you for any future job opportunities, for cross-referencing against future applications to Cabot that you may make, for managing and administering our equal opportunities reporting and to support our diversity programmes.
- 9.4 If we hire you, we will keep your personal data for longer and we explain this in our employee privacy notice, which would be shared with you.
- 9.5 Any personal data contained in any work-related correspondence or records may be retained for longer, dependant on the retention period of the file that your personal data is held on.

10. **What are your rights in relation to your personal data and how can you exercise them?**

10.1 You have certain legal rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

10.2 <sup>1</sup>Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

10.3 Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

10.4 If you wish to exercise any of your rights please log in to Cabot's recruiting portal and choose the "Data Subject Data Requests" option in the first instance. If you have any problems accessing that option, then please contact us at [recruiting@cabotcorp.com](mailto:recruiting@cabotcorp.com) or via your contact or other representative at the relevant Cabot entity.

10.5 You also have the right to lodge a complaint with the data protection regulator in the country in which the relevant Cabot entity is located.

11. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by sending you an email. We also encourage you to check this notice on a regular basis.

12. **Where can you find out more?**

12.1 If you would like more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us at [recruiting@cabotcorp.com](mailto:recruiting@cabotcorp.com) or Cabot's global corporate personnel responsible for data protection located at:

Global Data Protection  
Cabot Corporation  
Two Seaport Lane, Suite 1300  
Boston, MA 02210  
U.S.A.

Telephone: +1 617 345-0100  
Fax: +1 617 342-6256

E-mail: [globaldataprotection@cabotcorp.com](mailto:globaldataprotection@cabotcorp.com)

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<sup>1</sup> Note that Article 7(3) GDPR makes it clear that it must be as easy for the data subject to withdraw their consent as it was to give their consent. You should ensure your consent withdrawal mechanisms reflect this.

**SCHEDULE 1**

**Categories of personal data<sup>2</sup>**

Type of personal data	Collected from
<b>a) Contact Information</b> <ul style="list-style-type: none"> <li>◆ Name(s)</li> <li>◆ Address(es)</li> <li>◆ Email address(es)</li> <li>◆ Contact details including mobile telephone number(s)</li> </ul>	You
<b>b) Personal Information</b> <ul style="list-style-type: none"> <li>◆ Date and place of birth</li> <li>◆ Gender</li> <li>◆ Marital or relationship status</li> <li>◆ Lifestyle and social circumstances</li> <li>◆ Preferred languages(s)</li> </ul>	You
<b>c) Identity and Background Information</b> <ul style="list-style-type: none"> <li>◆ Details of education and qualifications and results</li> <li>◆ Career history, experience and skills</li> <li>◆ Passport information</li> <li>◆ Driving licence information</li> <li>◆ Psychometric test results</li> <li>◆ Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)</li> <li>◆ Curriculum Vitae (CV) or resume and professional profile</li> <li>◆ Image or photographs</li> <li>◆ Evaluative notes and decisions from job interviews</li> <li>◆ Preferences relating to job location and working time preferences</li> <li>◆ Current and expected salary and benefits</li> <li>◆ Requests for, and results of, reference checks</li> <li>◆ Existence of non-compete or other restrictive clauses with former employers</li> <li>◆ Military status</li> <li>◆ Awards and achievements</li> </ul>	<ul style="list-style-type: none"> <li>◆ You</li> <li>◆ Recruitment consultants and agencies</li> <li>◆ Third party testing providers</li> <li>◆ Your previous employers or other references/referees</li> <li>◆ Government agencies</li> <li>◆ Publicly available information from online resources</li> </ul>
<b>d) Special Category Personal Data</b> <ul style="list-style-type: none"> <li>◆ Nationality and visa information</li> <li>◆ Data concerning physical and/or mental health (including occupational health requirements and drug and alcohol test results)</li> <li>◆ Information relating to actual or suspected criminal convictions and offences</li> </ul>	<ul style="list-style-type: none"> <li>◆ You</li> <li>◆ Company medical officers, your doctor(s) or other health service providers</li> </ul>
<b>e) Travel and Expenses Information for Interviews</b> <ul style="list-style-type: none"> <li>◆ Expenses and receipts</li> <li>◆ Transportation and accommodation booking information</li> <li>◆ Travel itinerary information</li> <li>◆ Payment information (which may include your bank account details)</li> </ul>	<ul style="list-style-type: none"> <li>◆ You</li> <li>◆ Travel and expense processing service providers</li> </ul>
<b>f) Benefits Information</b> <ul style="list-style-type: none"> <li>◆ Private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries</li> <li>◆ Death benefit information</li> </ul>	<ul style="list-style-type: none"> <li>◆ You</li> </ul>

<sup>2</sup> This covers application interview, testing, decision-making and any onboarding for new starters.

Type of personal data	Collected from
g) <b>Asset, Systems and Platform Usage and Communications Information for On Site Interviews</b> ♦ CCTV and visitor records and access pass use	♦ You ♦ Us ♦ Our suppliers (including third party cloud-based providers) ♦ Your use of Cabot assets, systems and platforms
h) <b>Voluntarily Provided Information</b>	
♦ Any other personal information provided voluntarily by you	♦ You

## SCHEDULE 2

### Purposes of processing personal data

The circumstances in which we process your personal data are identified below and we have indicated alongside each the purpose or purposes for which we are carrying out that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing		Lawful basis - We are permitted to process your personal data because...					
		1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	
a) Recruitment and workforce planning							
1.	Administering your application for a job with us and considering your suitability for the relevant role		✓		✓		
2.	Obtaining, considering and verifying your employment references and employment history	✓					
3.	Reviewing and confirming your right to work <b>(Note: special category personal data Schedule 3)</b>			✓			
4.	Conducting verification and vetting, including criminal background checks and credit checks where required by law <b>(Note: special category personal data Schedule 3)</b>	✓		✓	✓		
5.	Administering, and reviewing the results of, psychometric testing and other assessments <b>[(Note: special category personal data Schedule 3)]</b>	✓					
6.	Recording and otherwise processing "protected category" status for the purpose of compliance with our employment law obligations <b>(Note: special category personal data Schedule 3)</b>	✓		✓	✓		
7.	Making a job offer to you and entering into a contract of employment with you		✓				
8.	Identifying and assessing Cabot's strategic business direction and resourcing needs, current employees and areas for development, including succession planning and development plans				✓		
9.	Analysing recruitment and retention objectives, processes and employee turnover rates				✓		
10.	Developing, operating and collecting feedback on recruitment activities and employee selection processes				✓		

11.	Retaining your personal data on file in order to contact you about future job opportunities which may be of interest to you and for which you may be a suitable candidate	✓			✓		
<b>b) General employment management and administration</b>							
12.	Communicating with you and providing you with information in connection with your recruitment from time to time		✓		✓	✓	
13.	Paying your expenses		✓		✓		
14.	Where details have been provided to us by you, evaluating your benefits package (in respect of current or prior private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries and death benefit information) for the purposes of benchmarking against our proposed offer and adjusting it as thought necessary	✓		✓	✓		
15.	Managing our health and safety compliance obligations, including assessing your fitness to work and providing appropriate workplace adjustments (Note: special category personal data <b>Schedule 3</b> )		✓	✓	✓		
16.	Drug and alcohol testing (Note: special category personal data <b>Schedule 3</b> )	✓		✓	✓		
17.	Any other personal information provided voluntarily by you in relation to interviews and other meetings, leave/working pattern requirements, interview travel arrangements and hospitality (Note: special category personal data <b>Schedule 3</b> )	✓			✓		
<b>c) Security and governance</b>							
18.	Monitoring the security of Cabot's physical premises			✓	✓		
19.	Set up of identification and authentication of candidates and other individuals (Note: special category personal data <b>Schedule 3</b> )				✓		
<b>d) Legal and regulatory compliance and responsibilities</b>							
20.	Managing and administering our equal opportunities reporting (Note: special category personal data <b>Schedule 3</b> )				✓		✓
21.	Compliance with obligations needed to set up a contract of employment between you and Cabot		✓				
22.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: special category personal data <b>Schedule 3</b> )			✓			✓



23.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities				✓		
24.	Complying with disclosure orders arising in civil proceedings ( <b>Note: special category personal data Schedule 3</b> )			✓			✓
25.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Cabot's compliance with relevant legal and regulatory requirements, including requirements related to business and legal entity registrations and filings ( <b>Note: special category personal data Schedule 3</b> )			✓	✓		✓
26.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Cabot's compliance with best practice and good governance responsibilities				✓		
27.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes ( <b>Note: special category personal data Schedule 3</b> )			✓	✓		✓
<b>e) Day-to-day business operations</b>							
28.	Supporting our diversity programmes and staff support networks and initiatives ( <b>Note: special category personal data Schedule 3</b> )	✓			✓		✓
29.	Administering your interview accommodation and travel arrangements		✓	✓	✓		
30.	Operating, reviewing and responding to CCTV surveillance of Cabot premises, including monitoring footage and sharing with appropriate recipients on request or voluntarily			✓	✓		

## SCHEDULE 3

### Purposes of processing special category personal data

**We are required by law to treat special category personal data with even more care than usual and we need to have further justification for collecting, storing and using this type of personal information.**

We may process special categories of personal information in the following circumstances:

1. Where we need to carry out our legal obligations or exercise rights in connection with employment;
2. Where it is needed in the public interest; or
3. In limited circumstances, with your explicit written consent.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Under our obligations as an employer receiving, dealing with, considering, reviewing and responding to your application for a job with us, we will use your special category personal data in the following ways:

- ◆ We may use nationality and visa information to confirm your right to work in the applicable country.
- ◆ We may carry out psychometric testing and other assessments.
- ◆ We may carry out drug and alcohol testing.
- ◆ We will use information to conduct verification and vetting, including criminal background checks and credit checks where required by law.
- ◆ We will use your information to set up identification and authentication of you for employment.
- ◆ We may use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace, to assess your fitness to work and to provide appropriate workplace adjustments.
- ◆ We may use information about your race or national or ethnic origin, to ensure meaningful equal opportunity monitoring, for managing and administering our equal opportunities reporting and to support our diversity programmes and staff support networks and initiatives.
- ◆ We may use your sensitive personal data to comply with our legal and regulatory responsibilities for example; complying with disclosure orders, responding to binding requests or search warrants or orders from courts, governmental, regulatory or enforcement bodies and authorities. We may also use such information to monitor and ensure compliance with Cabot's policies and procedures.
- ◆ You may also provide us with special category personal data voluntarily in relation to e.g. interviews and other meetings, leave/working pattern requirements, work travel and hospitality.

**SCHEDULE 4: YOUR RIGHTS IN RELATION TO PERSONAL DATA**

Your right <sup>3</sup>	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a “data subject access request”).	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other staff. Other exemptions may apply dependent on the information and context.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (ie not for paper records). It covers only the personal data that has been provided to us by you.
<b>Rights in relation to inaccurate personal or incomplete data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our data processing</b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the “ <i>right to be forgotten</i> ”), eg where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
<b>Right to withdrawal of consent</b>	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

<sup>3</sup>

Note that Article 12 GDPR contains further requirements that the controller should adhere to in connection with the rights of data subjects. For example, where the data subject makes the request by electronic form means, the information must be provided by electronic means where possible, unless otherwise requested by the data subject.

**SCHEDULE 5**

**DETAILS OF CABOT GROUP MEMBERS**

If you would like to obtain further information about your data protection rights, please contact [recruiting@cabotcorp.com](mailto:recruiting@cabotcorp.com) in the first instance.

Employer Name	Employer's Address
<b>Cabot Carbon Limited</b>	Sully Moors Road Sully , Vale of Glamorgan CF64 5RP England
<b>Cabot Norit UK Limited</b>	Clydesmill Place Cambuslang Ind. Estate Glasgow , Scotland G32 8RF England
<b>Cabot Performance Materials UK Ltd</b>	Materials UK Ltd Pioneer House Pioneer Business Park North Road Ellesmere Port CH65 1AD
<b>Cabot Specialty Fluids Limited</b>	Cabot House, Hareness Circle Altens Industrial Estate Aberdeen , AB12 3LY Scotland
<b>Cabot Specialty Fluids Limited, Norwegian branch office</b>	Building Kystbasen Agotnes , Bergen NO 5347 Norway
<b>Purton Carbons Limited</b>	Purton Treatment Workshop Riddle Street Purton Berkeley , GL 139 HN England