

CBRE EU RECRUITMENT PRIVACY NOTICE

Last Updated: 12 October 2020

At CBRE we take your personal data very seriously. This policy provides information as to CBRE’s role as a Data Controller (as defined in the General Data Privacy Regulation (EU) 2016/679) when processing personal data for recruitment purposes. This policy:

- sets out the types of personal data that we collect about you
- explains how and why we collect and use your personal data
- explains how long we keep your personal data for
- explains when, why and with who we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us.

We keep our privacy notice under regular review. If we change this privacy notice, we will publish the updated version here.

What personal data do we collect about you during the recruitment process, and on what legal basis?

During the recruitment process, we process the following data about you for the following purposes. For prospective candidates, contractors and referees, unless otherwise noted below our collection and processing of this data is **necessary for our legitimate interests** of assessing suitability for potential roles, finding potential candidates and contacting referees.

Data	Purposes
Personal information such as name, title, addresses, telephone numbers and personal email addresses, date of birth	To assess your application, find available opportunities and further information needed to assess your eligibility through the various stages of the recruitment process. We use your personal data to assess your applicability and skills for the role you have applied for, and where necessary, match your skills, experience and education with a potential position within CBRE.
Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the recruitment process)	
Details contained in letters of application and resume/CV (including previous employment or work background; education history; professional qualifications; professional memberships; interests; language and other relevant skills; certificates and certification expiration dates); project assignments and time spent on assignments; Skills and experience; development programmes planned and attended	
Feedback from interviewers and assessors and notes taken during interview	
Current salary information	
Willingness to relocate	Conducting background checks or testing to assess your suitability for a role
educational records and work history references	
Results of any tests (including psychometric tests we carry out during the recruitment process)	

As a potential candidate during interviews, or if you are selected for a role and as part of pre-approval, we may be required to process the following **sensitive personal data** about you for the following purposes:

Data	Purposes
Data relating to a disability	If you are interviewed and submitted as a candidate, then this may involve the processing of more detailed personal data including sensitive data about a disability that you or others provide about you. In that case we always ask for your consent before undertaking such processing. Where reasonable adjustments need to be made during

	<p>the selection/onboarding process, we may need to share your individual requirements with the line manager This information will help us ensure the recruitment process caters to your needs as an individual.</p>
Information about criminal convictions	<p>We may also collect information about criminal convictions and may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy. We collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. To the extent that we process information relating to criminal convictions our lawful basis for doing so will be when we are required by law to process such information or with your explicit consent. We will use information about criminal convictions and offences to ensure that we can meet our contractual obligations to clients. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.</p>
Working rights	<p>As part of our recruitment procedures, we are required to take copies of candidate’s passports (and visa if applicable). We process this data in on the basis of our legitimate interest to verify right to work status. If you progress to final interview stage, you will be required to bring these documents in. No offer of employment will be made without this verification. This must be the original document; photocopies will not be accepted.</p> <p>Passport copies will be stored securely and are only accessible by HR personnel. Your passport will only be available to HR personnel to validate right to work. Passport copies will be deleted after 6 months. If you would like this data to be deleted prior to this time, please contact your recruitment point of contact.</p> <p>Candidates who are located outside of the country in which the role is located will be required to validate their proof of right to work once they arrive in the country. We process this data in on the basis of our legitimate interest to verify right to work status. You will not be able to commence your employment for CBRE without prior right to work verification.</p>

Equal Opportunity and Diversity Data

We may also request, **and then with your consent**, collect sensitive personal data about you in the form of equal opportunity and diversity and inclusion personal data. **Collection of this data is voluntary; if you do not wish to answer a question, please select the ‘Prefer not to say’ option and we will respect that decision.** This processing is for the purposes of analysing and improving the equality, inclusion and diversity within our recruitment process and practices. We do this to ensure we attract a diverse range of applicants, treat all those applicants equally and monitor those and associated commitments. The Equal Opportunity and Diversity data you submit will not be visible to the recruitment team or anyone part of the recruitment process and will not be used as part of any decision making with respect to candidates. **We will only collect this special personal data from you, and further process this data, on the basis of your explicit consent.**

Where do we collect personal data about you from?

The following are the various sources from where we may collect personal data about you:

- **Directly from you.** This is information you provide while searching for a new opportunity and/or during the different recruitment stages.

- **From an agent/third party acting on your behalf.** e.g. Contractor’s Limited Company.
- **Vendors as part of the recruitment process,** e.g. background check providers.
- **Through publicly available sources.** We use the following public sources including LinkedIn, other Job Board websites and online CV libraries.
- **By reference or word of mouth.** For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.

How long do we keep your personal data for?

We keep your personal data in accordance with our records retention policies and for no longer than two **years** from our initial receipt of it. Copies of any passports, for example, are kept for no longer than **6 months** in accordance with our policy. Please note that you may change or withdraw your diversity and inclusion data at any time.

Who do we share your personal data with?

Internally within CBRE HR teams

Other than your diversity and inclusion data, your personal data is shared with the line manager who initiates a search for personnel, to ascertain if you are a good fit for the available position and the individuals who will interview and make the decisions about your application.

External data sharing with third parties

Where necessary to fulfil the purposes described in this Privacy Notice, CBRE may disclose your personal data to certain third parties as described below. Because CBRE operates globally, some of these third parties may be located in third party countries or jurisdictions. If we make such a transfer we will, or our service providers and vendors will, as applicable, provide safeguards appropriate to any applicable laws. See “Do We Transfer Your Data outside of the EEA?”, below, for more information.

Vendors and Service Providers:

CBRE may share your personal data with companies acting as our authorized agents and service providers as follows for the following purposes:

Vendors or Suppliers	Technology recruitment platform provider; technology platform providers as part of talent acquisition process; background check providers; assessment providers.
External auditors and advisors	Audit and expert advice

Legally Affiliated Entities:

If CBRE is merged with another organization, or in the event of a transfer of our assets or operations, CBRE may disclose or transfer your personal data in connection with such transaction.

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary, or withdraw your consent for the processing of your personal data as you are entitled to do at any point, we may not be able to continue with your application or match you with available job opportunities. Please note that withdrawing your consent does not invalidate any processing conducted prior to your withdrawal.

Do we make automated decisions concerning you?

No, we do not carry out automated profiling.

Do we use Cookies to collect personal data on you?

To provide better service to you on our websites, we use cookies to collect your personal data when you browse our websites. Please [click here](#) to view our cookie policy for more details.

Do we transfer your data outside the EEA?

To match your skills and experience with current opportunities, we may transfer your personal data to countries outside the EEA. We have global recruitment team working on recruitment needs, and for certain roles, the line manager may also be located outside the EEA. These countries' privacy laws may be different from those in your home country. Where we transfer data to a country which has not been deemed to provide adequate data protection standards we always have security measures and approved model clauses in place to protect your personal data.

To find out more about how we safeguard your information in relation to transfers contact us on EMEAPrivacyDirector@cbre.com

How do we protect your data?

We endeavour to protect the security of your personal data and use various types of technology to protect your personal data. We store your personal data on a secure server, and use procedures designed to protect the personal data we collect from unauthorized access, destruction, use, modification or disclosure.

Although we will take (and require our third-party providers to take) commercially reasonable security precautions regarding your personal data, we cannot guarantee that any of your personal data stored on our servers or transmitted to or from any of our staff will be free from unauthorized access, and we cannot be liable for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. By using the CBRE careers website, you acknowledge that you understand and accept these risks.

What rights do you have in relation to the data we hold on you?

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

Individuals based in the European Union have the following rights in respect of their data:

1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights.

2. The right of access

You have the right to obtain access to your information. This is so you are aware and can check that we are using your information in accordance with data protection laws.

3. The right to rectification

You are entitled to have your information corrected if it is inaccurate or incomplete.

4. The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

5. The right to restrict processing

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

6. The right to data portability

You have rights to obtain and reuse your personal data for your own purposes across different services.

7. The right to object to processing

You have the right to object to certain types of processing (e.g. if you no longer want to be contacted with potential opportunities).

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

8. Where we rely on your consent, the right to withdraw your consent at any time

You may contact us at any time to withdraw your consent to the processing of your personal data. This will not affect the lawfulness of our processing of your personal data before you withdraw your consent.

Alternatively, we may be entitled to refuse to act on the request. Please consider your request responsibly before submitting it. We will respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will come back to you and let you know.

How will we contact you?

We may contact you by phone, email or social media. If you prefer us to contact you in a particular way, please let us know.

How can you contact us?

If you have any questions or concerns about the way CBRE has collected or handled your data or responded to any request to exercise your information rights or believe someone is violating CBRE's policies or the law, you can ask your question or report your concern via [CBRE Ethics Helpline](#). If you are not happy with any aspect of how we handle or process your personal data, you can lodge a complaint with us.

You may also lodge a complaint with your local data protection authority if you are dissatisfied with the way CBRE has handled your complaint.

- In the UK, the relevant authority is the Information Commissioner's Office (ICO): www.ico.org.uk.
- In Ireland, the relevant authority is the Data Protection Commission (DPC): <https://www.dataprotection.ie/>
- In Spain, the relevant authority is the Agencia Española de Protección de Datos (AEPD): <https://www.aepd.es/es>

If you have any further questions, comments or requests regarding the privacy notice or the processing of your personal data, please contact EMEAPrivacyDirector@cbre.com.

If you wish to exercise your data subject rights, please send an email to DSR@cbre.com. Contact information for our global Data Protection Officers (DPOs) is also available in our [Global Web Privacy and Cookie Policy](#).