

OUR APPLICANT PRIVACY NOTICE

This Notice lets you know how Smiths Group uses your personal data when you apply for a role with Smiths, including Smiths Group Plc, John Crane, Flex-Tek, Smiths Detection and Smiths Interconnect.

When we say "we", "us", or "our" in this Notice, we mean the Smiths entity to which you applied and that is conducting the recruitment process. This Smiths entity is the data controller of your personal data processed as an applicant for employment of Smiths Group. *If you are an applicant based in Germany please also refer to Annex 1 in addition to the main part of this Notice.*

This Notice reflects the transparency requirements of the GDPR and UK GDPR - which refers to the General Data Protection Regulation of the European Union and UK respectively. These or other data protection laws may apply, depending on where the entity you are applying to is based.

This Notice provides you with information about the types of personal data we collect from you, how we collect your personal data and how long we keep it, our reasons for collecting and using your personal data, information about how we share your personal data and on your information rights.

Where we need your consent to process your personal data (such as for the purpose of conducting specific background checks prior to you commencing employment with us and to enable third parties to release information about you as part of those checks) you will be asked for your consent before these checks take place. We carry out these background checks only if the laws in the country in which you are based permit us to do so.

In most cases we will process your personal data for reasons other consent and as set out in this Notice. Countries outside of the UK and European Union may require a general consent for processing personal data and in such circumstances applying for a position will be deemed as your consent for us to process your personal data.

Any changes to this Applicant Privacy Statement will be communicated on www.smiths.com, www.johncrane.com, www.flextekgroup.com, www.smithsdetection.com, and www.smithsinterconnect.com, and, unless stated otherwise, will take effect immediately once posted.

You can contact us for information about how we process your personal data using the following contact information:

Office for Data Protection Compliance
Smiths Group PLC
10th Floor, Arbor,
255 Blackfriars Rd
London SE1 9AX
T: +44 (0) 20 7004 1600
F: +44 (0) 20 7004 1644
E: dataprotection@smiths.com

What personal data do you collect from me and use?

We may collect, store, and use the following categories and types of data which identifies you or which can be used to identify you if the laws in your country permit us to do so:

- **identification data**, such as your name, citizenship, passport data, national insurance number and tax reference.
- **personal information**, such as your date and place of birth, and gender;
- **contact details**, such as your home address, telephone number and email address;
- **education and work experience**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience;
- **other application data**, such as the information included in your application form/CV;
- **information collected as part of the interview process**, such as notes taken from your interview or information provided by recruitment agencies;
- **communications**, such as emails, instant messages and other communications;
- **bank account details**, where we have agreed to pay you travel or other expenses for the recruitment process; and
- **background check information**, such as information obtained through reference checks and confirmation about your work/educational background (to the extent permitted by applicable law).

If you apply for a job with us, we may also collect and use the following *special categories* of data, provided that the laws in your country permit us to do so:

- **health and medical data**, such as information about your medical conditions, sickness absence and reasons for it, or medical conditions resulting in mobility issues;
- **criminal records data**, relating to any previous criminal convictions or as a result of a background criminal check;
- **diversity and inclusion data**, such as your ethnic origin, religious background and/or sexual orientation.

In most cases you provide your personal data directly to us or via a Smiths nominated third party, such as a recruitment service provider, in connection with your application (e.g. in your CV, reference letters, school degrees or certificates). However, we may receive some information about you from third parties such as government departments or current/former employers.

Overall, the provisions of your personal data is optional and is not required by law. However, if you wish to apply for a job with us, we need to process your personal data. Not providing your personal data may result in us being unable to proceed with your application.

When do you collect my personal data?

We collect your personal data:

- when you apply for any job opportunity at one of our companies (including via our online application tools); and/or
- during the interview and recruitment process.
- Where we conduct background checks as a condition of successful employment and where permitted by local laws.

What activities do you carry out using my personal data – "*Processing Activities*"?

We collect and use your personal data for a variety of reasons linked to processing your application for a role with us. We set out a list of reasons why we collect and use your data (the Processing Activities) below:

- administering and processing your application;
- determining your eligibility for the role you applied for;
- articulating our employment proposition/job offer;
- conducting background checks as part of your application (to the extent permitted by applicable law);
- complying with applicable laws and employment-related requirements, e.g., diversity;
- monitoring and ensuring compliance with applicable policies and procedures and laws;
- communicating with you, Smiths employees and third parties, including informing you of future opportunities with Smiths; and
- responding to and complying with requests and legal demands from regulators or other authorities.

We do not use your personal data for automated decision-making, including profiling.

Why do you carry out these Processing Activities using my personal data?

We need to collect, process and use the types of personal data we list above to carry out a variety of

activities that are linked to your application for a role with us and Smiths compliance with its obligations as part of the recruitment process.

Some of the laws that apply to us require us to tell you about the legal basis for using your personal data. We list these below:

The processing is necessary to take steps at your request prior to and decide about the entering into an employment contract with you: Administering and processing your application and determining your eligibility for the role you have applied for.

Legal Obligation: we may use your data for compliance with our legal obligations, in particular in labour and employment law. At times we may receive requests from regulators or other authorised bodies to use your personal data to comply with a legal or regulatory obligation. Where this is the case, we will ensure that the request is legitimate.

Consent: where required by local law, we will ask for your consent to collect and use your personal data (for example to conduct background checks). The provision of your consent is voluntary. You have the right to withdraw your consent at any time with effect for the future by contacting us using the contact information set out above or by other means that may be specifically indicated by us in the context of a processing activity.

Legitimate Interests: where we talk about the legitimate interests of Smiths or third parties, we mean:

- operation of a whistleblowing policy (where not required by law);
- physical security, IT and network security;
- internal investigations;
- right to freedom of expression or information; and
- prevention of fraud, misuse of company IT systems, or money laundering.

When we rely on legitimate interests as the basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party, with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

For how long do you keep my personal data?

We keep your personal information for no longer than is necessary and in compliance with Smiths Global HR Retention Policy. We may, for example, keep your personal information for a reasonable time after your application process is completed, in case you have any subsequent queries about our processing of your application or with your permission to keep you notified of future job opportunities that we consider you suitable for. Where personal information is kept, that period will be determined based on applicable local law. For further information, please contact us as set out above.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

We explain here the rights that applicants for roles at one of our offices in the European Union/European Economic Area or UK may have in relation to personal data:

How can I find out what personal data you hold

about me?

You may contact us using the contact information above if you would like more detailed information about what personal data we have collected from you, including the categories of personal data processed, the purposes of the processing, the retention period, the third parties to whom that data is transferred and, in case of a transfer to a country without sufficient protection of personal data, the appropriate safeguards applied. You may also request a copy of your data. Note that we do have to consider the interests of others, and certain other legal obligations or restrictions, so this is not an absolute right.

Can I ask you to delete or correct my personal data?

You may contact us using the contact information above if you would like us to delete your personal data or to have your personal data corrected and, if required to do so, we will comply with your request.

Can I ask you to stop using my personal data?

You may contact us using the contact information above if you would like us to stop using your personal data (either entirely or for some of our Processing Activities) and, if required to do so, we will comply with your request.

Can I ask you to transfer my personal data to a third party?

You may contact us using the contact information above if you would like us to transfer your personal data you provided to us to a third party in a structured, commonly used and machine-readable format and, if required to do so, we will comply with your request.

Do you securely store my personal data?

We apply strict security standards, controls, and processes to protect your personal information from unauthorised access, loss, or accidental deletion. These include restricting who can have access to your personal data and protecting your data with security tools appropriate to the type of information e.g. encryption software and secure file transfer tools. We also require that our third-party processors who handle your personal data do the same.

Do you share my personal data with third parties?

To help us carry out our Processing Activities, we may need to share your personal data with entities within and outside of Smiths Group as follows:

- **Smiths Entities** – due to our corporate structure, we may transfer your data to other Smiths Group entities, in particular to (i) the Smiths entity at the headquarters for the Smiths Division to which you are applying, and (ii) Smiths Group Plc, who may collect, transfer and/or use the personal data we have collected from you for some or all of our Processing Activities. Where we share your personal information with other Smiths Group entities, they will use your information in a manner consistent with the purposes for which it was originally collected and consistent with this Applicant Privacy Statement and applicable data protection and privacy

laws.

- **Our Data Processors** – we may share your personal data with our third party service providers or with Smith Group entities who provide us with legal, event management, talent management, recruitment, communication and/or IT support services ("Data Processors"). To provide such services, our Data Processors process your personal data on our behalf. Our Data Processors have met our criteria as trusted guardians of personal data and are subject to contractual obligations to implement appropriate security measures to safeguard your personal data and to process personal data only as instructed by us.
- **Other Third Parties** – your personal data may also be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities) and independent external advisors (e.g., lawyers, auditors).

For the full list of the Smiths Group entities and third parties that we may share your data with, please contact us as set out above.

Do you transfer my personal data overseas?

Some of the Smiths Group entities, Data Processors and other third parties that we share your personal data with are located outside of the European Economic Area (EEA) or UK, respectively.

If we transfer your personal data from the UK or EEA to entities outside of the UK or EEA, to a country that is not officially recognized as providing an adequate level of data protection, we will apply safeguards to make sure that your data is being protected as required by applicable data protection law. This includes the most recent Standard Data Protection Clauses, the respective UK addendum, the UK International Data Transfer Agreement, each as applicable, and other safeguards that may be available. Where necessary, we also apply supplementary measures to ensure a sufficient level of data protection, taking account of the situation in the recipient country.

You can ask for more information on the appropriate safeguards by contacting us as set out above.

What should I do if I am not happy with how my information is being used?

You can contact us using the contact information above if you are not happy with how we are handling your personal data.

You also have the right to complain to our relevant supervisory authority, which is the Information Commissioner's Officer (ICO) in the UK, or to any other competent data protection supervisory authority. You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113

For applicants based in the European Union, contact details of data protection supervisory authorities

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can be found here: https://edpb.europa.eu/about-edpb/board/members_en

Annex 1

This Annex 1 applies if you apply for a job with one of the German Smiths entities (e.g., Smiths Detection GmbH, Flexschlauch Produktions GmbH, John Crane GmbH or Hypertac GmbH). The German Smiths entity to which you apply is the controller of your personal data.

1. What personal data do you collect from me and use?

- a.) In deviation from the description in the main part of this Applicant Privacy Notice, the German Smiths entities do not collect the following personal data:
- health and medical data, such as information about your medical conditions, sickness absence and reasons for it, or mobility issues;
 - criminal records data, relating to any previous criminal convictions or as a result of a background criminal check; and
 - diversity and inclusion data, such as your racial origin, gender, religious background and/or sexual orientation.

We do not receive information about you directly from third parties such as government departments or current/former employers.

2. Why do you carry out these Processing Activities using my personal data? What are the legal bases to do so?

In deviation from the main part of this Applicant Privacy Notice, the German Smiths entities do not carry out background screenings. When we process your personal data, we rely on the following legal bases:

Processing Activities	Legal Basis
Administering and processing your application;	The processing is necessary in order to take steps at your request prior to and decide about the entering into an employment contract with you (Sec. 26(1) sentence 1 of the German Federal Data Protection Act (Bundesdatenschutzgesetz)).
Determining your eligibility for the role you applied for;	
	<p>The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR).</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement.</p>
Complying with applicable laws and employment-related requirements;	The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR).
Monitoring and ensuring compliance with applicable policies and procedures and laws;	The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement.
Communicating with you, Smiths employees and third parties, including informing you of future opportunities with Smiths	<p>The processing is necessary in order to take steps at your request prior to and decide about the entering into an employment contract with you (Sec. 26(1) sentence 1 of the German Federal Data Protection Act (Bundesdatenschutzgesetz)).</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR).</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement.</p> <p>You consented to the processing of your personal data for this purposes (Art. 6(1)(a) GDPR)</p>

<p>Responding to and complying with requests and legal demands from regulators or other authorities;</p>	<p>The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR).</p>
<p>Performance of our business, regulatory and legal obligations.</p>	<p>The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement.</p>

3. For how long do you keep my personal data?

We keep your personal information for no longer than is necessary. In the event of a negative hiring decision, we will delete your personal data after six months, unless you have consented to a longer retention of your personal data for you to be considered for future job opportunities.