

Global Atlantic Financial Company Employee Candidate Privacy Notice

Scope and Overview

This Employee Candidate Privacy Notice (“Notice”) describes how Global Atlantic Financial Company, and its subsidiaries, affiliates, and related entities (collectively, “GAFC,” “we,” or “us”) collect, and use, personal information during the employment application and recruitment process. This Notice applies to job applicants only, and applies to all employment positions to which you apply.

This Notice describes the categories of personal information that we collect, how we use and secure that personal information, when we may disclose your personal information to third parties, and when we may transfer your personal information across international borders. This Notice also describes your rights regarding the personal information that is provided to us. We will only use your personal information in accordance with this Notice, unless otherwise required by applicable law. We will take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

If you do not provide us the personal information that is necessary for us to consider your application (e.g., evidence of qualifications or work history), then we will not be able to process your application.

Collection of Personal Information

For purposes of this Notice, personal information means any information that is subject to a data protection law, statute, or regulation, and that relates to an identified, or identifiable, natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an 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.

GAFC may collect personal information from you, the candidate; our recruitment vendors; background and credit check providers; public agencies responsible for assisting in the employment eligibility and verification process; from publicly available sources; and, from your identified references. The processing of your personal information may be based on your consent; necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract with you; necessary for compliance with our legal obligations; or, necessary for our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms. We may collect, process, and retain the following categories of personal information about you:

- Contact information you provided to us, including name, title, residential or postal address, telephone number, and personal email address.
- The information you provided GAFC in your curriculum vitae (“CV”), resume, cover letter, or similar documentation, or during the course of your interview or other engagement with us.
- Details regarding the type of employment sought, willingness to relocate, as well as job, compensation, and benefits preferences.
- Information related to your background, criminal, credit checks, or other information provided by your references, or other third-parties, related to your employment history, skills, or qualifications.
- Information related to previous applications to GAFC, or previous employment history with GAFC.

We may also collect, process, and retain the following types of more sensitive personal information:

- Information about your race, ethnicity, or national origin.
- Information about your health, including any medical condition, health, or sickness records.
- Information about your criminal convictions and offenses.

How We Use Personal Information

We use your personal information, where applicable law permits or requires, to satisfy our employment application and recruitment process, or our other legitimate business interests. For example, we may use your personal information for the following purposes:

- Identifying and evaluating job applicants, including assessing skills, qualifications, and interests.
- Verifying your information and completing employment, background and reference checks, which may be subject to

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your consent where required by applicable law.

- Communicating with you about the recruitment process and your application.
- To comply with our legal, judicial, regulatory, administrative, or other corporate requirements, including, but not limited to, requirements mandating that we conduct criminal record or other background checks.
- Analyzing and improving our application and recruitment process.
- To accommodate individuals who may have specialized needs during the employment process.
- To protect the rights and property of GAFC, other job applicants, employees, or the public, as required, or permitted, by law.

We will only use your personal information in accordance with this Notice, and we do not sell your personal information for any business reason or other purpose. If we need to use your personal information for an unrelated purpose, we will, to the extent practicable, provide notice to you and, if required by law, seek your consent. We may use your personal information without your consent, where permitted by applicable law or regulation. GAFC does not use personal information to subject any employee to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects.

Data Sharing

We will disclose your personal information within GAFC to appropriate officials who are involved in the employment application and recruitment process. We may also disclose your personal information to our designated agents, or third-party service providers, who require such information to assist us with administering the employment application and recruitment process, including, but not limited to, obtaining employment verification and background checks. We will share your personal information with third parties when required to do so by law, or by regulatory requirements to which you, or we, are subject to, where it is necessary to administer our working relationship with you, or where we have another legitimate interest in doing so, such as where it is necessary for the operation of our business.

We may also share your personal information with potential acquirers or investors of GAFC, or the business area in which you work. We may share your personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some, or all, of GAFC's practice or assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by GAFC, in any form or format, is among the assets transferred.

We Do Not Sell Your Data

We do not sell or rent personal information that we have collected or retain about you to any other third-party for any purpose. Accordingly, we do not offer individuals the ability to "opt-out" of the selling or renting of personal information because we do not engage in those practices.

Data Retention

If you are offered, and accept, an employment position with GAFC, we will retain the information you provided during the employment application and recruitment process in accordance with our employee records schedule, to which you will have access upon your start of employment. If you are not provided, or accept, an employment offer, we will retain your personal information in accordance with our internal retention schedule, which is designed to ensure that records no longer necessary for legal or business purposes may be disposed of in a timely and efficient manner, and records needed for business or legal purposes are properly maintained. After this period, we will, unless otherwise required by law, securely destroy your personal information in accordance with applicable laws and regulations. If you would like to know more about our records retention schedule, please contact privacy@gafg.com.

International Data Transfer and Storage

The personal information that GAFC collects, uses, and retains is generally stored in the United States, and our service providers, or other third parties, to whom we share your personal information may transit or retain your personal information in their country of incorporation or other locations. Please be aware that your personal information may be retained in a country that does not provide the same level of protections as the laws in your country of residence or location. In addition, GAFC does not participate in the U.S. Privacy Shield program. To the extent we transfer your personal

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information outside the jurisdiction in which you reside, we will do so using appropriate and suitable safeguards in compliance with applicable data protection laws.

Data Protection Rights

Depending on the jurisdiction in which you reside, or where GAFC conducts its data processing activities, you may be afforded additional rights or privileges under certain applicable data protection laws. Exhibit 1 sets forth additional data protection rights or privileges that may apply to you.

Disclaimer

With regard to any personal information that you provide GAFC, regardless of whether that personal information relates to you or a third-party, you must ensure, on a continuing basis, that (i) such personal information is accurate, relevant, and complete, (ii) you have the lawful basis to provide GAFC with such personal information, and (iii) you have provided this Notice to, and/or received consent from, any third party whose personal information you have provided GAFC. If you choose not to provide us with the personal information identified herein, then GAFC may not be able to satisfy our own contractual or legal obligations, and in such circumstances, employment with GAFC may not be permissible. You acknowledge and agree that GAFC shall not be held liable for any consequence directly resulting from these circumstances. This Notice does not form part of any contract of employment or other agreement to provide services, impose any independent obligation on GAFC to proceed with any business transaction or agreement, and does not create any employment or professional relationship between you and GAFC.

Contact

If you have any questions or concerns related to this Notice, or would like to exercise any of the rights set forth herein, please email us, with the Subject Line entitled, "Privacy Request" at privacy@gafg.com. In the alternative, you can write to us at: Global Atlantic Financial Company, ATTN: Privacy Inquiry, 20 Guest Street, 9th Floor, Boston, MA 02135. You may also call us at (800) 903-1452. For general information about GAFC's privacy practices, please visit our website privacy policy <https://www.globalatlantic.com/privacy-policy>.

Amendment Date: This Notice was last amended on January 1, 2020.

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**EXHIBIT 1
JURISDICTION SPECIFIC DATA PROTECTION RIGHTS**

If your personal information is subject to, or afforded protection under, any of the following data protection laws, then you are entitled to receive notice of the following.

1 The General Data Protection Regulation (GDPR)

To the extent permitted by the European Union (EU) GDPR or EU Member State law, you may request (i) access to your personal information (known as a “data subject access request”), which enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it; (ii) GAFC to correct any incomplete or inaccurate personal information that we hold about you, and (iii) GAFC to delete or remove from our systems your personal information. To the extent permitted by the EU GDPR, you may also request us to stop processing your personal information where we are relying on a legitimate interest for doing so and there is something about your particular situation that makes you want to object to our processing on this ground. In addition, you may request GAFC to suspend processing of your personal information, for example, if you want us to establish its accuracy or the reason for processing it. You may request that GAFC transfer your personal information to another party. In the limited circumstances where you have provided your consent to us collecting, processing, and transferring your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact privacy@gafg.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose you originally agreed to, unless we have another legitimate interest for doing so. Issues, concerns, or complaints you have regarding your personal information can also be brought to the attention of an applicable supervisory authority, a list of which is available here: https://edpb.europa.eu/about-edpb/board/members_en.

2. The California Consumer Privacy Act

The California Consumer Privacy Act (CCPA) requires certain businesses that collect personal information on California “consumers” (as defined within the CCPA) to, at or before the point of collection, inform the consumer as to the categories of personal information to be collected and the purposes for which the categories of personal information will be used. The types of personal information that GAFC collects from its job candidates, and the purposes for which such information is used, is set forth in this Notice.