

At Franklin Templeton (FT), we care about your privacy and value the trust you place in us when you share your personal information.

This notice is for **Candidates**, defined as any job applicant for full or part-time employment, including current employees or individuals contracted for employment related services, such as but not limited to temporary staff, interns, contractors and consultants. The Careers section of our website allows you to apply for open positions and submit a Candidate profile.

If you chose to apply, we recommend that you review this Privacy Notice. From time to time, we may update this notice and any revised version will be available on our website:

[www.franklintempletoncareers.com/privacy](http://www.franklintempletoncareers.com/privacy)

## 1. Web-related Privacy Issues

### External Links

Our website may contain links to third-party websites or content, over which we have no control. Please review the privacy notices of these third-party sites for their privacy practices and the way they manage your personal information.

### Cookies and similar technologies

Some of our web pages may contain cookies (a text file which identifies your device to our network) and/or web beacons, clear GIFs, tags or pixels (electronic image files that track navigation through our sites) placed by FT or third-party advertisers.

For simplicity, we refer to all these technologies as “cookies.”

We also do not look for web browser “do not track” signals.

### How do we use cookies?

We may use cookies to customize content and advertising, provide social media features, see how visitors navigate our website and to improve the services we offer you.

We may also engage third party tracking and advertising providers to act on our behalf to track and analyze your usage of our website using cookies. These third parties collect, and share with us, usage information about visits to our website and may correlate this information with other information (e.g. your IP address) to track page usage, help us target our recommendations and advertising and measure and research the effectiveness of our advertisements.

### Enabling and Disabling Cookies

You can learn more about the cookies we use and choose which cookie categories you wish to allow by visiting the Privacy Preference Center on our website.

## 2. Privacy Notice

This notice describes the categories of personal information we collect and for which purposes. By personal information, we mean information that is reasonably capable of being directly associated to you or in other ways be reasonably linked, directly or indirectly, to you.

### Sources of Personal Information

We may collect personal information from the following sources:

- From you, directly, or from those acting on your behalf;
- Another person (typically someone who knows you) who provides referral information about you to us
- Automatically collected from the internet or other network activity, internal monitoring activities, or closed-circuit television (CCTV);
- Other parties that perform services for us or on our behalf; or
- Publicly available sources of information.

### Personal Information We Collect

Your personal information is either provided by you, created by us (or on our behalf) in connection with your candidacy, or obtained from third parties. If you are offered employment with us, please refer to our Employee Privacy Notice.

We may collect the following types of personal information:

- **Contact information** such as name, phone number(s), postal/home address and email addresses;

- **Employment qualification information** such as your curriculum vitae (CV)/resume which may include your expertise, training, education, employment history and performance details, special skills (e.g. languages), employment eligibility, professional or industry affiliations, and securities industry license information;
- **Biometric and/or pictorial information** such as photos identifying you that you voluntarily provide and/or fingerprints when required due to a job position;
- **Background screening/pre-employment check information** such as tax or government identification documents and/or numbers, immigration status/work eligibility, birthdate, other information necessary to conduct screenings and results of background screenings and professional references;
- **Other information collected or generated in connection with your prospective employment** such as compensation and bonus expectations, communications connected to potential employment and interviews (emails, calls, instant messenger (IM) chats/texts).
- **Information captured by our websites** such web logs, cookies, and information about your interactions with our websites and FT webpages on social media sites such as Twitter and LinkedIn;
- **Information about your use of company premises** such as a visitor log which may contain the time, location, and purpose of your visit, and closed-circuit television (CCTV) recordings.

### How We Use Your Personal Information

We may use your personal information for the following purposes:

- facilitating Human Resources (HR) functions and administration;
- evaluating your application, qualifications and eligibility for employment;
- verifying the accuracy of information provided and conducting background screening and reference checks;
- communicating with you regarding your candidacy;
- alerting you to job opportunities and/or vacancies (you can unsubscribe or withdraw your consent to these alerts);
- planning and monitoring recruitment campaigns;
- aggregating diversity information for improving diversity and inclusion programs;
- monitoring access to and security of company premises;
- business management and other legitimate business purposes in compliance with our policies and procedures, or as otherwise permitted or required by law.

FT or its service providers may use artificial intelligence (AI) in connection with our use of your personal information for the purposes described above. Appropriate labelling and/or human intervention options are provided in accordance with applicable law.

### Diversity Monitoring

We may collect information about you in accordance with our diversity and inclusion commitments and in accordance with local laws. Where diversity monitoring is conducted with your consent, it may be withdrawn at any time. This information helps us understand our Candidate demographic better, target initiatives to Candidates more effectively and send out a strong and positive signal that diversity and inclusion are important to FT. Dependent on the country of candidacy for employment, the information we may collect could include but not limited to: age, gender, gender identity, sexual orientation, social mobility, disability status, military status, and ethnicity.

This information will only be used by FT to analyze Candidate and workforce diversity in connection with our commitment to diversity and inclusion. We will not use it to make decisions about your potential employment relationship with us.

### Data Retention and Protection

We keep your personal information for as long as necessary in connection with the purposes identified within this notice. Subject to legal or compliance obligations, regardless of your current location or residence

when applying, we will retain your personal information for four (4) years for all United States based roles. For roles based in all other countries, we retain your personal information for one (1) year.

In certain circumstances, data may be retained for a longer period of time, for example, where we are in ongoing correspondence or there is a continuing claim or investigation.

Our web logs are kept for 60 days for security reasons.

We have implemented reasonable administrative, technical, and organizational measures, including physical, electronic, and procedural safeguards, based on our Corporate Information Security policy, which is designed to secure your personal information. For example, access to your personal information is limited to authorized FT employees, and FT employees are required to follow specific procedures with respect to maintaining the confidentiality of your personal information.

### Information We Share

Your personal information may be transferred to and stored outside the country where you apply for employment, within our group of companies and/or service providers. Please refer to Third parties and other recipient categories for the categories of potential third-party recipients.

FT has offices in the following countries: Argentina, Australia, Bahamas, Canada, China, Cayman Islands, Dubai International Financial Centre (DIFC), Countries within the European Economic Area, Hong Kong, India, Israel, Japan, Korea, Malaysia, Singapore, South Africa, Switzerland, Turkey, United Arab Emirates, United Kingdom, and the United States.

Some of these countries may not have the equivalent level of data protection laws as those in your location. If we need to transfer your personal information internationally, we will take steps to make sure that it is protected and safeguarded.

In addition to sharing information with other FT group companies and third- parties, we may also share or transfer your personal information to a prospective or actual purchaser or transferee, in the event that a Franklin Templeton company or its assets is/are merged or sold or a sale or transfer is intended.

### Why do we collect your personal information?

Your personal information is collected (including sharing such information with third parties) where we have a legal reason to do so:

- Fulfil a contract we have with you;
- When it is our legal duty;
- When you consent to it;
- When it is in our legitimate interest\*;

*(\*) Our legitimate interest is when we have a valid business or commercial reason to use your information and the use does not negatively impact your personal rights and freedoms.*

### Your Privacy Rights

You may have the following rights, under certain circumstances, in relation to your personal information:

- Ask whether FT has personal information about you and for what purpose and if it is disclosed to third parties;
- Access to your personal information including copies of that information;
- Rectify inaccurate/incomplete personal information about you;
- Request deletion of your personal information;
- Raise a complaint to a supervisory authority;
- Additionally, you may have the right to request a restriction, objection or data portability in certain circumstances.

If you wish to exercise a right, download our [Individual Rights Request Form](http://www.franklintempleton.com/rightsrequestforms) ([www.franklintempleton.com/rightsrequestforms](http://www.franklintempleton.com/rightsrequestforms)) or you may contact us as provided in section 3 below. The information will be provided free of charge, except where local laws allow for charges.

## 3. Contact Us

Contact us at one of the following addresses to exercise a privacy right, ask a question, share a concern, or make a complaint regarding this notice and/or our privacy practices:

[DataProtectionOfficer@franklintempleton.com](mailto:DataProtectionOfficer@franklintempleton.com)

**FAO: Data Protection Officer**

Franklin Templeton International Services S.à r.l.

8A, rue Albert Borschette  
L-1246 Luxembourg  
Grand Duchy of Luxembourg

Alternatively, you can also contact the applicable Franklin Templeton Fund or Management Company. Franklin Templeton Funds and their Management Companies act as joint-controllers unless local jurisdiction states differently. For a full list of FT companies (controllers), visit:

[www.franklintempletonglobal.com/privacy/fund-entities](http://www.franklintempletonglobal.com/privacy/fund-entities)

## 4. Third Parties and Other Recipients

The following categories of third parties associated with the recruitment/hiring process may receive your personal information as applicable:

- **Account Processing System suppliers** – provide services or maintain systems processing account information (Candidate applications), such as suppliers systems supporting FT’s Website.
- **Business Contact database administrators** - provide services or maintain business contact databases, and systems processing business contact information, such as suppliers systems supporting FT’s Website(s).
- **Courts/Police, Regulators & Tax Authorities**- Competent third-party authorities (government bodies) where requested, required by law, or where we consider it necessary, information may be shared.
- **Employee Representative Bodies** – In accordance with local law and where applicable, a group of employees elected to represent the workforce to senior management or the applicable FT board in a particular country.
- **Events Management Providers** – provide services to plan, organise and facilitate applicable recruitment events.
- **IT Systems Suppliers** - provide technical services specifically for IT systems.
- **Payroll Providers** - provide services for set up and payment of employees and where applicable successful candidates.
- **Professional advisors, i.e. auditors and lawyers** - Third parties who provide professional and/or legal services to Franklin Templeton group companies
- **Recruitment Providers** - provide recruitment services.
- **Security** – provide services to monitor FT’s physical premises.