

# Product Privacy Information

## cvMail Privacy Overview

Thomson Reuters has a long history of providing reliable and trustworthy information to our customers. We maintain this reputation through a variety of means, which are supported by a comprehensive privacy program.

This document provides an overview of how Thomson Reuters' cvMail service handles privacy, and in particular how we protect personal data. It answers questions that our customers often ask to assist in managing their legal, regulatory and business requirements.

### What is the cvMail service?

The cvMail service is an Applicant Tracking System (ATS) that is used by customers to streamline recruitment processes, deliver benefits including lower time to hire, saving time and delivering strengthened recruitment outcomes.

cvMail digitizes and centralizes the recruitment process, allowing employers to reduce costs, lower time-to-hire, streamline recruitment, enhance employer branding and improve quality of hire. It also assists candidates in identifying jobs that may be suitable for them and simplifies the application process resulting in increased efficiency in the recruitment process.

### How is personal data used within the cvMail service?

Personal details are stored in data centres in either the UK or Australia. The application is accessed securely and used by customers through the Customer Portal. At the customers' instruction, data may be shared with a customer's third party providers (e.g. assessment platform providers, onboarding platforms, payroll systems and external job boards) via a secure connection.

### Role of customers and Thomson Reuters

With respect to processing personal data in the cvMail service, Thomson Reuters acts as a Processor as defined by the GDPR. Where

Thomson Reuters acts as a Processor, you are the Controller. In some instances, both you and Thomson Reuters may be identified as Joint Controllers of certain personal data.

For the purposes of EU data protection laws, a customer is the data controller of the data it enters into cvMail. In instances where the customer is the Controller, you should ensure that you are aware of, and comply with, any obligations they have as a data controller under applicable laws (including any obligations to use data lawfully and in a proportionate manner). Controllers should provide users with appropriate guidelines and/or training to ensure that the processing of any such special categories of data is lawful and proportionate.

### What types of personal data flow through cvMail?

The cvMail application typically captures personal data types such as:

- Contact details, including address, phone number, e-mail address
- Date of Birth
- User / account names
- Gender
- Academic achievement records
- Documents submitted to support applications which may include resumes, education transcripts, images, photographs, etc.

- Logs of internet usage / system usage (e.g. IP address, log-on/off, user actions, websites)
- Other types of personal data that may be entered by the customer, candidate or third party agency in a free text field

In addition, the following special or sensitive categories of personal data may be processed:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health
- Sexual orientation
- Criminal convictions/offences including register thereof

Customers may use the service to capture other personal data in response to questions they formulate themselves that could include sensitive or special category personal data, and in doing so will need to be mindful of their obligations under relevant law.

## Who can access personal data?

We limit access to personal data only to employees of the Thomson Reuters' group who require access to provide support for the service. Where such access is granted, Thomson Reuters puts in place protections (e.g. contractual or other legally recognized protections) to safeguard the processing of the personal data.

We occasionally use sub-processors to provide services. A list of the sub-processors that we may use can be found here: [www.tr.com/privacy-information](http://www.tr.com/privacy-information).

We may also disclose personal data as required by law or to assert, maintain or defend our legal rights.

## Can personal data be accessed outside the EEA or Australia?

Thomson Reuters is a global organization that provides 24/7 solutions. In order to do this, we use a global team to provide services, support and maintenance. This means that personal data may be accessed logically from countries outside of the EEA and Australia in accordance with applicable laws.

Measures that Thomson Reuters uses to safeguard the transfer of personal data outside of the EEA and Australia include:

- Intra-group agreements for transfers within the Thomson Reuters group of entities
- Specific Processor clauses for processing outside of Thomson Reuters where we are the Controller

We also ensure that appropriate technical measures are in place to protect data when it is in transit and at rest.

## How can Thomson Reuters assist with compliance with individual rights requests?

As data controllers, our customers are responsible for complying with any requests received from individuals to exercise rights under data protection laws. We have processes in place to assist cvMail customers with adding, amending, or deleting the data that users have entered into cvMail.

## How long is data retained for?

Customers are responsible for setting, and respecting, appropriate retention periods for the personal data that users have entered into cvMail. cvMail includes functionality that allows you to delete data as desired or upon your request.

Following the expiry or termination of a customer's contract for cvMail, Thomson Reuters returns or deletes information in line with its contractual commitments.

## How is personal data secured?

Securing personal data is an important aspect of protecting privacy. Our security organization applies policies, standards and supporting security controls at the level appropriate to the risk level and the service provided. In addition, appropriate security controls are communicated to application owners and technology teams across the business to support secure development of products and a secure operating environment.

We pay specific attention to the protection of personal data and the risks associated with processing this data. If you would like to know more about our information security management system and the measures we take, please contact your account manager.

We do not agree bespoke security and data protection specifications for customers as the stability and integrity of the cvMail service relies on the standardization of our security and data protection methodologies.

## Can customers audit Thomson Reuters?

As the cvMail service is a shared service, to safeguard the security and confidentiality of the services and the data provided by users, no individual customer is permitted to carry out an audit. However, at our discretion, we may provide certificates, third party audit reports or other relevant information. For additional details on our information security policies and standards, and the types of independent third party security assessments that are performed, please contact your account manager.

## Personal data breaches

Thomson Reuters implements appropriate measures designed to prevent personal data breaches. These measures are reviewed and updated as necessary to meet changes in regulatory requirements.

More information on how we respond to personal data breaches appears in our customer contracts.

## For more information

If you would like to know more about our approach to processing and protecting personal data for cvMail, please contact your account manager.

For general questions on how Thomson Reuters deals with privacy, please contact us at [privacy.enquiries@thomsonreuters.com](mailto:privacy.enquiries@thomsonreuters.com).

General information can also be found at <http://ir.thomsonreuters.com>.