

BRUNSWICK

GROUP PRIVACY NOTICE

Updated: April 2026

Brunswick Group (“Brunswick,” “we,” “us,” “our”) is committed to protecting the privacy and security of your Personal Data. This Privacy Notice describes how we collect and use Personal Data about you during and after your working relationship with us, in accordance with the EU General Data Protection Regulation and the UK Data Protection Act of 2018 (collectively referred to herein as “GDPR”), California Consumer Privacy Act of 2018, (“CCPA”), and other applicable data protection legislation.

This Privacy Notice applies to all job applicants, employees, workers and contractors (“you” or “individuals”).

We are responsible for deciding how we hold and use your Personal Data. The GDPR, CCPA, and other applicable data protection legislation require us to notify colleagues in those relevant jurisdictions of the information contained in this Privacy Notice.

This Privacy Notice does not form part of any contract of employment or other contract to provide services. We may update this Privacy Notice at any time.

For the purposes of this Privacy Notice, the relevant Brunswick legal entity which employs you or to whom you are contracted shall be the “controller” of the Personal Data captured (as defined below). Your Personal Data may be lawfully and legitimately shared with other Brunswick legal entities subject to safeguards implemented in compliance with the applicable data protection legislation (see **Data sharing and transfer** below).

It is important that you read this notice on occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information.

THE PERSONAL DATA WE HOLD ABOUT YOU

“Personal Data”, means any information about an individual from which that individual can be identified. It does not include data where the identity has been removed or where the data cannot reasonably be linked to an identifiable individual (anonymous data). There are also “special categories” of more sensitive Personal Data which require a higher level of protection (e.g., health data, race, ethnicity).

You will begin to provide us with certain Personal Data from the point at which you contact Brunswick to apply for a role or are approached to provide services to us. Upon joining or beginning to work with Brunswick we will request that you provide us with Personal Data that we require to facilitate the functioning of our business. While you are working at or for Brunswick you will create information which is stored on our systems in connection with the work you are doing for us or which you provide to us upon request, to fulfil management processes.

In broad terms, we will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- where we need to perform the contract, we have entered into with you;
- where we need to comply with a legal obligation;
- where we have your consent in accordance with applicable law; or
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We may also use your Personal Data in the following situations, which are likely to be rare:

- where we need to protect your vital interests (or someone else's vital interests);
- where necessary in the public interest; or
- if you fail to provide Personal Data.

If you fail to provide certain information when requested, we may not be able to uphold the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We will create, collect, store and process the following categories of Personal Data about you:

Basic contact details - Your name, address and contact details, including email address and telephone number so that we can contact you or send correspondence to you while you work for us, or you are engaged by us;

Background checks - If requested for employment purposes, information about your nationality and copies of right to work documentation, references and background checks and other information included in a CV as part of our onboarding process prior to you commencing employment with, or providing services to, Brunswick;

Qualifications and work experience - If requested for employment purposes, details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Brunswick where applicable, to help us assess whether you would be suitable for Brunswick;

Interview process - Information prepared by us about you during the interview and selection process for us to evaluate whether Brunswick should make you an offer of employment;

Contractual relationship - The agreed contract of employment or contract for services you enter into with us so that we can evidence the relationship we have with you and monitor the rights and obligations of both parties. We also require this information for financial auditing purposes;

Compensation - Information about your remuneration, and in the case of an employment relationship, bonus arrangements and entitlement to benefits such as pension or social security contributions, personal, travel or study loans or insurance cover. This information will generally be captured in the contractual documentation relating to your employment — it is important for us to retain this information to be able to comply fully with our contractual obligations with you;

Financial information - Details of your bank account so that we can pay your contractual salary and make any fixed or discretionary bonus payments;

Tax and payment information - Payroll records including payslips, tax status information and national insurance number so that we can provide you with accurate information for the preparation of your own tax filings (either personal or corporate) and so that we can keep accurate financial records as required by law;

Emergency contact information - Information about your marital status, next of kin, dependants and emergency contacts (including their contact information). It is important that we can contact someone who you designate in the case of an emergency or if you are not contactable and we reasonably need to try and reach you urgently;

Brunswick employment - Records of your employment at Brunswick (including days of work and working hours, job titles, and work history) so that we can confirm that you are acting in accordance with your contractual obligations and so that we can track your development at Brunswick;

Timesheets - If you are providing services in a freelance or consultancy capacity, you will complete, and we will retain timesheets evidencing your hours of work so that we can confirm compliance with your service contract and so that we can pay you the correct amount (where your remuneration is based on an hourly rate);

Leave - If employed, details of periods of annual leave taken by you. We need to be able to track that you have booked and taken the leave to which you are entitled in your contract and in the case of annual leave are alerted to the fact that you may not have taken sufficient leave from a welfare perspective. We also need to ensure that relevant individuals are informed at Brunswick so that services to clients can continue to be provided;

Disciplinary - Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence. It is legitimate for us to record your work history at Brunswick and to have information from which we can gather evidence and assess each grievance properly;

Performance assessment - Assessments of your performance, including information submitted by others about you during appraisal processes, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence. It is important that we can properly assess and manage our employees and collate evidence to set out clear development goals and make informed judgments about promotions and reward;

Physical security - CCTV footage and other information obtained through electronic means such as fob entry records. We need to be able to secure our places of work for the safety of our staff and to protect sensitive client and business information. In addition, in the event of an emergency which requires the evacuation of the building, we are more easily able to ascertain who needs to be accounted for. This is not in place in all offices, and we may seek consent from the individuals affected where such measures are deployed depending on local legal requirements;

Protection of our systems - Information about your use of our information and communications systems. We do not routinely monitor the content of communications generated and received on electronic devices provided by Brunswick and to and from its email accounts or the accounts of its staff set up on third party communications platforms in support of their activities at Brunswick. However, we do take reasonable and proportionate measures to protect, secure and manage Brunswick's ICT systems for the benefit of all users and to ensure that you are acting in accordance with your contractual obligations and Brunswick's policies you are required to adhere to, which may, under circumstances permitted by law, include limited monitoring of communications generated and received on our systems;

Device and systems management - We collect and generate technical information when managing, securing and supporting Brunswick-managed devices and systems. This may include device identifiers, IP addresses, system configuration and network information and, where enabled or available, device-level location data. Location functionality may be enabled to support operational, security and technical compliance requirements, including system configuration, security controls and device recovery. It is not continuously active and operates in accordance with device configuration settings; where technically feasible, settings may be adjusted at device level by Brunswick's ICT team or, where applicable, by the user. Any location data processed is used solely for legitimate business, operational, security and device management purposes and is subject to appropriate safeguards. For further information regarding device settings, individuals may contact the ICT team.

Use of our systems - Information (both personal and that related to the services you provide to and/or your employment with Brunswick) which you voluntarily provide using Brunswick's ICT systems (mobile device or computer). This may be information which is transferred by email or information which you have provided through The Hub, PeopleHub or any other platform or communications tool;

We primarily collect personal data directly from you. In some circumstances, and where permitted by applicable law, we may also obtain personal data about you from third parties in connection with your engagement or working relationship with us. We may also use third party assessment providers to support our engagement and selection processes.

Audio and visual data - Photographs, videos, audio recordings and/or other images of you. We may obtain these in a variety of ways: we may require you to have a photo taken to create a visual identification card so we verify that you are authorised to access our offices without being accompanied; you may submit images of yourself alone or with colleagues and upload these onto Brunswick's systems; you may choose to participate in a meeting on a video-conferencing platform and provide your consent for the meeting to be recorded. If you are an employee, you may include your image next to your biography for the purposes of identifying yourself to clients or in pitches. Brunswick may also capture photos or shoot videos which contain your image for both internal newsletters at Brunswick, or which appear in external Brunswick communications or marketing materials — these images will continue to appear in marketing materials and in videos even once you are no longer employed by Brunswick;

Compliance with laws and requests from regulatory bodies - We frequently work on mandates from publicly-listed clients who require us to maintain insider lists in compliance with relevant securities and insider trading regulations. To comply with legal and contractual obligations we need to submit specified Personal Data relating to individuals (including name, address and contact information) either to our clients for them to pass on to the relevant regulator or directly to the regulator. Further, there are occasions where we are required to disclose certain data (including email correspondence) which we are compelled to provide to judicial and regulatory bodies in connection with judicial proceedings and investigations.

Sensitive Personal Data - "Sensitive Personal Data", is defined as information that discloses any of the following about you:

- Racial or ethnic origins;
- Political opinions;
- Religious or similar beliefs;
- Trade union membership or non-membership;
- Physical or mental health or condition (including disability);
- Sexual orientation;
- Biometric data (where used for identification purposes);

- Criminal or alleged criminal activities; and
- Criminal proceedings, criminal convictions or any sentences imposed by the courts.

We will only collect, store and process this sensitive Personal Data:

- If we are legally permitted to do so for a particular purpose;
- If we have obtained your explicit consent to use such information for that particular purpose no later than the point at which you provide this information to us.

If we request that you provide us with sensitive Personal Data, we will specify whether we are required to collect this by law for a particular purpose. If you are not legally required to provide us with this information for the purpose requested, you are under no obligation to provide this information to us. If you submit this information to us voluntarily, your submission shall be regarded as you providing your free consent for the processing of such information for the requested purpose.

Below are examples of instances where we may request the provision of sensitive Personal Data in certain jurisdictions where this is legally permissible.

- Racial or ethnic origins** - this information would be voluntarily submitted through our Equal Opportunity Monitoring Form (which forms part of the New Joiner Form in some of our offices) which you may be requested to voluntarily complete upon joining us. We may also request that you voluntarily submit this information from time to time for conducting surveys and questionnaires for the duration of your employment with us. We are committed to a policy of providing equal opportunities for all our employees. By collecting data of this nature, we are able to aggregate it for statistical analysis purposes in order to support our commitment to diversity in the workplace;
- Sexual Orientation** - this information would be voluntarily submitted through our Equal Opportunity Monitoring Form (which forms part of the New Joiner Form) which you may be requested to voluntarily complete upon joining us. We may also request that you voluntarily submit this information from time to time for conducting surveys and questionnaires for the duration of your employment with us. We are committed to a policy of providing equal opportunities for all our employees. By collecting data of this nature, we are able to aggregate it for analysis purposes in order to support our commitment to diversity in the workplace;
- Physical or mental health or condition** - this information would be voluntarily submitted through our Equal Opportunity Monitoring Form (which forms part of the New Joiner Form) which you may be asked to complete upon joining us. We may also request that you voluntarily submit this information from time to time for conducting surveys and questionnaires for the duration of your employment with us. We are committed to a policy of providing equal opportunities for all our employees. By collecting data of this nature, we are able to aggregate it for statistical analysis purposes in order to support our commitment to diversity in the workplace. When supporting an individual with a medical condition, we may ask them to go for an occupational health assessment. The individual must provide their consent to go to the assessment and for the occupational health provider to contact the individual's authorised doctor or medical practitioner to be granted access to further medical records to assist with the assessment. As a result of the assessment, we may make adaptations to the workplace (e.g. furniture, computer equipment, and the

- installation of equipment to assist with mobility) to respond to the needs to the individual in question. Frequently, these changes are mandated by law, and it is our duty to comply;
- iv. **Sickness or family-related leave** — from time to time you may need to take leave of this nature. We need to request information of this nature so that we can comply with employment and other laws. We will handle any such instance with the utmost discretion;
 - v. **Criminal or alleged criminal activities** — we do not routinely request the provision of data of this nature. However, we do undertake a background check on any individual who has been offered and accepted employment with us and in some instances, we are contractually bound by our clients to undertake specific checks on individuals who provide services to them in accordance with their own background checking requirements. Where legally permitted to do so, and with the individual's written, documented consent (where required), we may undertake a check of that individual's criminal convictions, or any sentences previously imposed on them by the courts. The individual is not under any obligation to give consent. You may notify us of any criminal or alleged criminal activities during you working for us. We will use information about criminal convictions and offences for the purposes of your ongoing employment. Any such information we obtain will be used by us to perform our contract with you, to comply with our legal obligations, and for reasons of substantial public interest (notably, preventing or detecting unlawful acts and protecting the public against dishonesty);
 - vi. **Travel and health insurance claims** — Brunswick has insurance in place to cover you in the event that you require medical treatment while you are overseas undertaking services on our behalf. To claim under Brunswick's policies, we need to provide evidence to our insurers of the expenses that you have incurred in obtaining treatment. In order for us to assist you in processing the claim and reimbursing you for the expenses incurred, you will need to provide us with evidence of the diagnosis for your illness, copies of receipts or other satisfactory evidence for medical services obtained (e.g. visit to a local doctor) and for the costs you have incurred in purchasing medicines which have been prescribed. You will in most cases be required to submit details into a relevant form provided by the insurer. Where this information is required, we will make it clear in any request we send to you by email that you will need to submit sensitive Personal Data in order for you to assist us and that by submitting this information to us you are providing us with the requisite consent to process this information for this purpose and to pass it onto the relevant insurer;
 - vii. **Religion** - this information would be voluntarily submitted through our Equal Opportunity Monitoring Form (which forms part of the New Joiner Form) which you may be requested to voluntarily complete upon joining us. We may also request that you voluntarily submit this information from time to time for conducting surveys and questionnaires for the duration of your employment with us. We are committed to a policy of providing equal opportunities for all our employees. By collecting data of this nature, we are able to aggregate it for analysis purposes in order to support our commitment to diversity in the workplace;
 - viii. **Biometric Identification** – this information may be voluntarily submitted by you following automated prompts on your work devices when they are first

allocated to you. You may also opt for your device to collect this data at any time after allocation. The data will, at all times, be stored only on your device and will not be transferred. This data is essential to the proper functioning of biometric identification systems, as activated by you on your individual device. You may opt to deactivate these systems at any time, and, in any event, all such data will be erased on termination of your employment.

Automated decision-making

We do not envisage that any decisions will be taken about you solely using automated means where there is no human involvement in the decision process. However, if this position changes we will notify you in writing in order to get your consent where required and will also provide a means to withdraw consent at a later time. Your consent is not obligatory for concluding or continuing an employment contract or where not required by law in your jurisdiction.

Data sharing and transfer

We may have to share your Personal Data with third parties, including third-party processors who are essential to the functioning of the ICT systems across Brunswick as a whole and other Brunswick entities across Brunswick Group who have a legitimate reason to be made aware of such Personal Data (“**Affiliates**”). A list of Affiliates within Brunswick is set out in Appendix 1. Please note that your Personal Data will only be shared to the extent this is strictly necessary and within the scope of the uses set out above, or to facilitate the technical processing of such information.

All Affiliates must respect the security of your Personal Data and to treat it in accordance with the law. We may transfer your Personal Data outside the European Economic Area. In the event this occurs you can expect a similar degree of protection in respect of your Personal Data. Personal Data is shared with Affiliates within Brunswick based on the EU Model Clauses and UK Addendum to the EU Model Clauses. Our contracts with entities such as our processors contain the necessary obligations required by law to protect your Personal Data; we only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

Data security

We have put in place measures to protect the security of your Personal Data and to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and Affiliates who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

Data Retention

We will retain your Personal Data for as long as it is necessary to fulfil the purposes outlined in this Privacy Notice. This means, we will process Personal Data as long as it is required to meet our contractual and statutory obligations. Please note that employment is a continuing obligation designed to last over a longer period of time. However, we may process your Personal Data longer, if necessary, on the basis of legitimate legal interests, for example, to defend ourselves against claims.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your Personal Data in accordance with applicable laws and regulations and our Data Retention Policy.

A copy of our Data Retention Policy is available upon request.

Your duty to inform us of changes

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your working relationship with us.

Your rights in connection with Personal Data

GDPR, CCPA, and other applicable data protection laws provide certain rights for data subjects. Under certain circumstances, by law you have the right to:

Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it;

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;

Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no legitimate reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below);

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;

Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it; and

Request the transfer of your Personal Data to another party in a machine-readable standard format.

If you want to review, verify, correct or request erasure of your Personal Data, object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please contact privacyenquiries@brunswickgroup.com. Please note that in certain circumstances, your request or part of your request may be subject to an exception under applicable law.

No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with the request in such circumstances, where permitted by law.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another

appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data 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 us by:

- email: privacyenquiries@brunswickgroup.com; or
- phone: **+44 (0) 20 7404 5959**.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. The withdrawal does not affect the lawfulness of processing based on consent before the withdrawal.

Data protection officer

We have only appointed a Data Protection Officer to oversee compliance with this Privacy Notice with respect to a specific Brunswick entity in jurisdictions where such appointment is mandatory. You do of course have the right to make a complaint at any time to your local national supervisory authority for data protection issues.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with an updated privacy notice when we make any material updates. We may also notify you in other ways from time to time about the processing of your Personal Data. By providing Personal Data to us, you acknowledge you have read this Privacy Notice (in conjunction with Brunswick's Privacy Policy available on our website).

Consents

Where your written affirmative and unambiguous consent is strictly required under applicable law for the collection, use and disclosure of sensitive Personal Data, we will provide you with the necessary consent form(s) to sign and return to us for our records.

If you have any questions in relation to this Privacy Notice, please email:

privacyenquiries@brunswickgroup.com

APPENDIX 1

Brunswick Affiliates

- Brunswick Lincoln Limited (UK; 13508340)
- Brunswick Group Partnership Limited (Jersey; 110079)
- Brunswick Minster LLC (Delaware; 6085023)
- Brunswick Group LLC (Delaware; 3811757)
- Brunswick Wynnstay Limited (Jersey; 122729)
- Brunswick Group Advisory Limited (UK; 13410347)
- Brunswick Corporate Limited (UK; 02749771)
- Brunswick Consultants Limited (UK; 02749773)
- The Lincoln Centre Limited (UK; 03636828)
- Brunswick Group Services Limited (UK; 02675453)
- Brunswick Group Limited S.R.L. (Belgium)
- Brunswick Group Limited (UK; 04077014)
- Brunswick Financial Consultants Limited (UK; 03824717)
- Brunswick Corporate Consultants Limited (UK; 04058094)
- Wynnstay Public Relations Limited (UK; 03205827)
- Wynnstay Brunswick Limited (UK; 02094879)
- Brunswick Group Advisory Limited (Spain Rep Office)
- Brunswick Europe Limited (UK; 03956497)
- Brunswick Europe Advisory Limited (UK; 11837366)
- MerchantCantos SARL (Switzerland; CHE-241.731.409)
- Brunswick Unipessoal LDA (Portugal)
- Brunswick Group GmbH (Germany; HRB 51768)
- Brunswick SARL (France; 432 373 082)
- Brunswick SRL (Italy; 1836104)
- BRNSWK Nordic AB (Sweden; 556701-8790)
- Brunswick Group Advisory S.L.U (Spain; 44774-1-M-788341-1)
- Brunswick Group Limited (Hong Kong; 911800)
- Beijing Brunswick Consulting Limited (China; 110000410287752)
- Beijing Brunswick Consulting Limited (Shanghai Branch)
- Brunswick Group PTE Limited (Singapore; 2013151972)
- Brunswick Group Advisory Limited (Hong Kong; 2021007)
- Brunswick Gulf Limited (UK; 02787834)

- Brunswick FZ LLC (Abu Dhabi)
- Brunswick Gulf Limited (Dubai Branch)
- Brunswick Limited (Saudi Arabia; 70281948221010786844)
- Brunswick India Limited (UK; 08766451)
- Brunswick Corporate Communications LLP (India)
- Brunswick Advisory Pty Limited (Australia; 647 819 289)
- Brunswick Comunicações Corporativas LTDA (Brazil;15.338.809/0 001-16)
- Brunswick Group Kabushiki Kaisha (Japan; 0110-01-124459)
- Wynnstay South Africa Limited (UK; 07951207)
- Brunswick South Africa Limited (UK; 03080474)
- Brunswick South Africa Limited (South Africa; 1995/011507/10)