

## PRIVACY NOTICE

The purpose of this Privacy Notice (“**Notice**”) is to inform individuals who inquire about and/or apply for employment with Western Asset Management Company, LLC (“**Western Asset**” or “**we**” or “**us**”) of the categories of Personal Information we collect and the purposes for which we use such Personal Information.

### 1. What Personal Information is Being Collected?

Western Asset collects, uses, and discloses Personal Information about job candidates for business purposes only and consistent with applicable laws. Where Western Asset discloses Personal Information to third parties, it does so for the same business purposes described below and, where appropriate, requires that such parties maintain its confidentiality and maintain appropriate systems and processes to ensure its security and protection.

For the purposes mentioned in the paragraph “How We Use Your Personal Information” we collect the following categories of Personal Information about you when you inquire about and/or apply for employment at Western Asset:

- Name
- Contact details (telephone number, email address and home address)
- Date of birth
- Resume/ Curriculum Vitae
- Current and previous employment details (including salary/bonus and employee benefits)
- Education background (university or school diplomas/certificates and other achievements)
- Languages spoken and level of proficiency
- Job preferences including willingness to travel and/or relocate
- Gender
- Marital status
- Evidence of identity (copy of Driver’s License or Passport)
- Photographic images submitted
- Interview notes

Where relevant to the recruitment process, including where necessary to accommodate any disability needs or to comply with some regulatory requirements, we may also have the need to process some special categories of Personal Information (Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or genetic data, biometric data, data concerning health or a natural person’s sex life or sexual orientation). Special categories of Personal Information processed may include:

- Criminal records
- Health related information

### 2. How We Use Your Personal Information

All the Personal Information you provide to us will be used subject to the restrictions and for the purposes described in this Notice, namely:

- a. to process your application including to identify and contact you;
- b. to determine whether you have the professional skills, expertise and experience for the position applied for;
- c. if you are offered a position with us, to verify the Personal Data provided including your identity, address, right to work, employment history and academic background and other background screening purposes including, where allowed by law, criminal record checks, searches with a credit reference agency and sanctions screening checks; and
- d. to provide you with information about future job vacancies, if you would like us to send you such notifications, which may include using data analytics to match your profile against vacant positions.

### **3. Additional Purposes for Using Personal Information**

In addition to the uses set forth above, Western Asset may use and share the categories of Personal Information identified:

- to comply with applicable legal and regulatory requests and obligations (including investigations).
- to establish or defend legal claims and allegations.
- for security or the prevention, detection, or investigation of fraud, suspected or actual illegal activity, or other misconduct.
- to seek advice from lawyers, auditors and other professional advisers.

Personal Information is processed both manually and electronically in accordance with the above purposes and, in any case, in order to guarantee data security and confidentiality in compliance with current regulations.

### **4. How Your Personal Information Is Collected**

We collect Personal Information in the following ways:

#### Our Website

We collect your Personal Information when you submit a job application and/or create a profile through the “Careers” section of our website.

#### Social network sites

We collect Personal Information about you from other sources, including LinkedIn and Google+ (“Social Network Sites”) when you choose to provide us with a link to your profile on any Social Network Site as part of your job application or you elect to register on our website via those Social Network Sites through the integrated functionality available on the website. If you sign-in to the website through Social Network Sites, we will collect your Personal Information from certain fields on these sites by taking a snapshot and merging this with other data captured through the online application form to create a single profile. We will collect the following Personal Information from Social Network Sites:

LinkedIn: Personal Information contained in the following fields: name, headline and summary, job title, current employer, employment history, recommendations and contact details made publicly available (such as phone number and email address). Your LinkedIn connections are not collected.

Google+: Personal Information contained in the following fields: first name, last name and public website.

We will not collect your photographs or videos from any Social Network Site unless you submit a photograph or video voluntarily as part of your recruitment application.

#### Recruitment agencies

Your Personal Information may be provided to us by recruitment agencies with whom you have registered when you confirm that are interested in pursuing a role with us. Where a recruitment agency refers you to us, a profile will be created for you in our recruitment database based on the information provided and you will receive a notification asking you to log in and complete your candidate profile. Candidates who do not log in and complete their profile within (1) month will have their profile deleted with the exception of your name and primary email address which will be retained as a record that you chose not to progress and will not be contacted again.

#### Other sources

Whilst in most cases we will collect Personal Information personally supplied by you, Personal Information may also be collected about you from third parties during the recruitment process such as references from previous employers.

Personal Information is processed both manually and electronically in accordance with the above-mentioned purposes and in compliance with current regulations to guarantee data security and data confidentiality. Access to Personal Information will be given only to those who need such access for the purposes listed above or where required by law. These parties may include human resources personnel, information

technology personnel, relevant business managers, and authorized representatives of internal control functions, such as Audit and Compliance.

Your Personal Information may also be provided to companies' agents, contractors, and third-party service providers to process your application. Third party service providers may include the firms we employ for our pre-employment background screening and health screening. Our employees and third party service providers are appropriately designated and trained to process data only according to the instructions we provide them or as required by law. Only the exact data required to fulfil each processing purpose (whether internal or external), is made available to the necessary individuals.

## **5. How We Store Your Personal Information and With Whom It Could Be Shared**

Your Personal Information is recorded in physical format and/or in our IT systems.

Your Personal Information will be stored on IT systems which are accessible to other Western Asset offices for the above-mentioned purposes. Western Asset offices are located in Pasadena, California (USA), New York (USA), Sao Paulo (Brazil), Melbourne (Australia), Singapore, Hong Kong (China), Tokyo (Japan) and Zurich (Switzerland). If your Personal Information is transferred to countries which do not have same or equivalent privacy laws, we will ensure that appropriate measures are in place.

Without prejudice to any communications made to comply with legal or contractual obligations, Personal Information may also be disclosed to external parties as required by applicable law or regulations (e.g. courts, a regulatory authority or a governmental entity).

When your Personal Information is shared within the Western Asset group or with contracted third party service providers we take all reasonable steps to ensure that your Personal Information and privacy are protected in line with the applicable legal obligations.

## **6. Questions**

If you have any questions about this Notice please contact the Human Resource Department.