

Effective Date: January 23, 2025

This Job Applicant Privacy Notice (“Notice”) outlines the types of Personal Data (defined below) that Crawford & Company, along with its affiliates and subsidiaries (“Crawford,” “we,” “our,” or “us”), collects during the job application process. It explains how we use and share your information when you apply for a job with us, how long we retain it, and the steps we take to protect it. Additionally, this Notice provides details about your rights, the choices you have regarding your information, and how you can manage its use and sharing.

For more information on our general practices towards Personal Data, please see our [Online Privacy Notice](#), including specific information required under [California and other state privacy laws in the United States](#).

It is important to note that data protection and privacy laws may vary across jurisdictions where Crawford operates. Our policy is to comply with all applicable laws, including requirements in certain countries to notify individuals about our personal data practices and, in some cases, obtain their consent to these practices.

In jurisdictions where applicable laws impose stricter requirements than those outlined in this Notice, we have implemented specific privacy practices to meet those requirements.

Definitions

“**Personal Data**” means information that can be used to identify you, directly or indirectly, alone or together with other information. This includes things such as your full name, contact information, email address, phone number, device IDs, certain cookie and network identifiers, and other categories described below. Various laws use different terms, such as “personal information,” “personally identifiable information,” and “personal data.” We will use “Personal Data” to include all.

“**Process**” or “**Processing**” means anything that is done with Personal Data, including collecting, using, changing, storing, or deleting.

Your Personal Data

We collect your Personal Data in connection with your job application and our recruitment and onboarding processes. This includes the following data:

Personal Data We Collect:

- **Contact Information:** Name, email address, mailing address, telephone number, and other contact details.
- **Authentication Information:** Username, password, and other credentials for any online application platforms.
- **Work Authorization and Identification Data:** Work authorization status, date of birth, gender, national ID, passport number, Social Security Number (for U.S. applicants), driver’s license, immigration status, and visa details.
- **Application Information:** CV, résumé, cover letter, employment history, education details, professional licenses, certifications, and references.
- **Skills and Preferences:** Knowledge, skills, abilities, work style, learning agility, aptitude, and professional preferences.
- **Referral Information:** Names and contact details of individuals providing references or referrals.
- **Online Activity:** Information related to your browsing activity on our application platform, including IP address, browser type, and interaction logs.
- **Communication Data:** Information you provide during emails, chats, phone calls, video interviews, or other recruitment communications.
- **Health or Accommodation Information:** If voluntarily provided or required by applicable law (e.g., for workplace accommodations).

- **Special Category Information for Diversity and Equality Monitoring (where allowed by law):** Information about your racial or ethnic origin, gender, disability status, sexual orientation, religion or belief, or other similar characteristics, collected solely for the purpose of monitoring and promoting diversity, equity, and inclusion in compliance with applicable laws and guidelines, such as those recommended by the Equality and Human Rights Commission (EHRC). This information will only be used in anonymized or aggregated form where possible, unless otherwise required by law.
- **Other Information:** Any additional information you choose to provide, such as awards, professional memberships, current salary, desired salary, and relocation preferences.

How We Collect Your Personal Data:

We collect Personal Data in a variety of ways, including:

- Directly from you through application forms, CVs, résumés, cover letters, and identity documents.
- During interviews, assessments, or other recruitment activities.
- From third parties, such as recruitment agencies, references, or background check providers.
- Automatically through online recruitment platforms, websites, or applicant tracking systems.
- Through your communications with our recruitment team via email, phone, video, or in-person.

Additional Information Collection:

If we require any other Personal Data not listed above, we will inform you of the specific information needed, the reasons for its collection, and whether it is mandatory. If the provision of certain Personal Data is mandatory for the recruitment process, we will also explain the consequences of not providing it.

How and Why we Use your Personal Data

We may use your Personal Data as part of the recruitment process and for related purposes, including but not limited to:

- **Assessing Suitability for Employment.** We process your Personal Data as part of the recruitment process by evaluating your skills, qualifications, and interests against career opportunities to determine your suitability for a position. This includes making decisions on whether to extend a job offer based on the information provided and conducting interviews, assessments, and aptitude tests to comprehensively assess your candidacy.
 - *Legal basis: to take steps prior to entering into an employment contract; legitimate interest in hiring qualified candidates.*
- **Communication with You.** We process your Personal Data to provide updates on your application status, schedule interviews and assessments, and respond to your inquiries by sharing relevant information about career opportunities.
 - *Legal basis: legitimate interest to communicate with candidates and manage the recruitment process; consent where required.*
- **Verifying and Validating Information.** We process your Personal Data by conducting background checks, reference checks, and verifying your qualifications, where permitted by law, as well as reviewing your work authorization and identity documentation to ensure compliance with legal and regulatory requirements.
 - *Legal basis: compliance with legal obligations; legitimate interest to ensure candidate suitability.*
- **Supporting Onboarding Process.** We process your Personal Data to prepare employment contracts and onboarding documentation for successful candidates, as well as to facilitate work visa or immigration processes when required.
 - *Legal basis: performance of an employment contract; legal obligation where applicable.*
- **Enhancing Recruitment Practices and Supporting Diversity (where allowed by law).** We process your Personal Data to improve our recruitment tools, practices, and diversity initiatives. This includes collecting and using special category data, such as racial or ethnic origin, gender, disability status, sexual orientation, and religion or belief, to

promote diversity, equity, and inclusion in line with applicable laws and guidelines, such as those recommended by the Equality and Human Rights Commission (EHRC). This data is processed in anonymized or aggregated form whenever possible, unless otherwise required by law.

- *Legal basis: legitimate interest in improving recruitment processes and supporting diversity and inclusion initiatives; compliance with legal or regulatory obligations where applicable.*
- **Complying with Legal and Regulatory Obligations.** We process your Personal Data to create reports required by applicable laws or regulations and to comply with national security, law enforcement, or other regulatory requirements to ensure adherence to legal and statutory obligations.
 - *Legal basis: for legal obligations.*
- **Ensuring Security and Preventing Fraud.** We process your Personal Data to implement and administer IT security measures and to protect against fraudulent or unauthorized activity related to the recruitment process.
 - *Legal basis: for legal obligations and legitimate interests to safeguard data and protect our assets.*
- **Conducting Research and Talent Acquisition Activities.** We process your Personal Data to proactively identify candidates for current and future opportunities by researching professional profiles and skills, and to reach out to individuals who may be suitable for roles at Crawford.
 - *Legal basis: legitimate interest in identifying and acquiring talent.*
- **Supporting Business Operations.** We process your Personal Data to maintain records for internal audits, risk management, and compliance with internal policies, as well as to support corporate activities such as mergers, restructuring, or divestitures.
 - *Legal basis: legitimate interest in managing business operations; compliance with legal obligations.*

We may use your Personal Data for other purposes that are consistent with or related to the purposes and uses described in this Notice, for which your Personal Data was provided to us. We may also combine or aggregate any of the information we collect for any of these purposes or for analyzing usage statistics and trends.

If we need to process your Personal Data for any purpose not outlined above, we will notify you and seek your consent (if required by law).

Please be aware that the legal bases listed specifically align the requirements of the General Data Protection Regulation in Europe and the United Kingdom. We may have other legal reasons to process your Personal Data under other privacy / data protection laws, such as those in the U.S., Canada, Australia, Asia, etc. If you have a question about a particular type of data and our reasons for processing it, please [contact us](#).

Sharing your Personal Data

Subject to applicable laws and, where required, your consent, we may share your Personal Data for recruitment and related purposes as outlined below:

- **Internally.** Your Personal Data may be shared with personnel involved in the recruitment and hiring process, including hiring managers, Human Resources teams, and other departments that support recruitment activities. This may include employees involved in evaluating your qualifications, managing recruitment systems, and onboarding successful candidates.
- **Service Providers:** We may share your Personal Data with third-party service providers who assist with recruitment and hiring processes as well as those who provide our corporate infrastructure, such as email providers. These providers may include recruitment agencies, talent acquisition platforms, background check providers (where permitted by law), and technology service providers. All service providers are contractually obligated to safeguard

your data and use it solely for the purposes outlined by us.

- **Corporate Affiliates:** Your Personal Data may be shared with affiliates or subsidiaries within the Crawford group for recruitment, resource planning, talent evaluation, and other legitimate business purposes such as general administration and operations. The current list of our locations may be found [here](#).
- **Background and Vetting Contacts / Entities. Your Current or Previous Employer and References.** We may disclose your Personal Data to your current or previous employer or references, where required, to verify your employment history, qualifications, or professional references. This includes background checks and criminal history check (where permitted by law) if you progress in the hiring process.
- **Public or Government Authorities.** We may disclose your Personal Data to comply with applicable laws, regulations, or legal processes, such as responding to subpoenas, court orders, or government audits. Additionally, we may share your data to protect the rights, safety, or property of Crawford, our employees, or others, including in cases of fraud detection or investigations.
- **Exercising Legal Rights.** Your Personal Data may be disclosed to external legal advisors or in connection with litigation, regulatory inquiries, or to establish, exercise, or defend our legal rights.
- **Corporate Transactions.** If Crawford is involved in a merger, acquisition, reorganization, sale, or similar corporate transaction, your Personal Data may be transferred to relevant third parties as part of the transaction.
- **With Your Consent.** In certain cases, we may share your Personal Data with third parties at your request or with your consent. For example, we may share your details with contractors or consultants as part of a referral request or for specific recruitment-related purposes.

If you have questions about how your Personal Data is shared or require further information about the safeguards in place for international transfers, please contact us using the details provided in the **Contact Information** section of this notice.

International Data Transfers

Crawford & Company is a global organization, and the Personal Data we collect from you during the recruitment process may be transferred to, accessed, or stored in jurisdictions outside of your home country, including but not limited to the United States, Australia, the European Union, and other regions where we or our service providers and business partners operate. Please note that some of these jurisdictions may not have data protection laws equivalent to those in your home country.

We will ensure that such transfers comply with applicable legal requirements to protect your Personal Data. If you are located in the European Economic Area, the United Kingdom, or another jurisdiction with specific data transfer requirements, we will transfer your Personal Data using mechanisms approved under applicable data protection laws. These mechanisms may include adequacy decisions, Standard Contractual Clauses, or other lawful transfer safeguards. Regardless of the location, we will protect your personal data in accordance with this Notice or as otherwise disclosed to you.

By applying for a role with Crawford, submitting your Personal Data, or using our recruitment services, you acknowledge that your Personal Data may be transferred, stored, and processed in jurisdictions outside your home country as described in this Notice. Where explicit consent is required for certain transfers, we will obtain your consent. If you would like to learn more about the specific safeguards in place for international transfers or request a copy of the applicable data transfer mechanisms, you may request such details by following instructions at the [Contact Us](#) section below.

Keeping your Personal Data

We retain and use your Personal Data for an appropriate period of time as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements, client contractual requirements and legal obligations and other business or commercial purposes to the extent provided in this Notice.

We take reasonable steps to delete the Personal Data we collect when (1) we have a legal obligation to do so, (2) we no longer have a purpose for retaining the information, or (3) if you ask us to delete your Personal Data, *unless* we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We may also decide to delete your Personal Data if we believe it is incomplete, inaccurate, or that our continued storage of your Personal Data is contrary to our legal obligations or business objectives. When we delete your Personal Data, it will be removed from our active servers and databases; but it may remain in our archives when it is not practical or possible to delete it. However, unless the law states otherwise, we are not required to retain your information or to keep your information on file for consideration for future opportunities.

Protecting your Personal Data

We recognize the importance of safeguarding your Personal Data and we endeavor to maintain reasonable and appropriate physical, technical, and organizational safeguards designed to protect your Personal Data against accidental loss and unauthorized access, use, alteration, or disclosure and to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times. From time to time, we review our security procedures to consider appropriate new technologies and methods. If you have a security-related concern, please [contact us](#).

Additional Disclosures for California Residents

If you are a California resident, this section provides additional disclosures about how we collect, use, and disclose your Personal Data in accordance with the California Consumer Privacy Act (CCPA) and other applicable California laws. In the event of a conflict between this section and the rest of this Privacy Notice, the provisions of this section will control for California residents.

Collection of Sensitive Personal Information

In addition to the Personal Data described in this Notice, we may collect certain categories of sensitive personal information as defined under California law. This may include race, sex/gender, religious beliefs, military service, nationality, ethnicity, account login credentials, and criminal background. California also classifies sexual orientation, philosophical beliefs, and certain government identification numbers as sensitive personal information.

Use of Sensitive Personal Information

We use sensitive personal information only as necessary to conduct our recruitment and hiring process and for purposes that cannot be opted out of under California law. This may include:

- **Trade union membership information:** To determine employment eligibility where required by applicable law.
- **Health and medical information:** To provide reasonable accommodations during interviews and comply with public health laws and regulations.
- **Religious beliefs:** To provide reasonable accommodations for interviews or to comply with applicable laws.
- **Racial/ethnic origin, gender, military service, and disability status:** For equal opportunity, diversity, and inclusion purposes, as well as to comply with applicable laws.
- **Criminal background:** To complete legally permissible background checks in connection with an offer of employment.

Personal Information Disclosure

California Privacy Laws, along with a few other states, define “sale” as disclosing or making available Personal Data to a third party in exchange for monetary or other valuable consideration. The term “sharing” includes doing so for purposes of cross-context behavioral advertising and is considered a form of “sale.” While we do not “sell” Personal Data for money, the disclosures of certain identifiers and personal information may be considered “sharing” Personal Data because of how some state Privacy Laws define it. Please check the “Contact us” section on how to opt out.

Your Choices and Rights

Different privacy / data protection laws provide a range of rights for individuals related to their data. You may or may not have these rights, but please [contact us](#) if you have questions. In particular, you have rights in the European Economic Area, United Kingdom, Switzerland, Canada, several states in the U.S., Australia, New Zealand, some countries in Asia and S. America, as well as various other countries. These rights generally include:

- **Right of Access.** In most privacy laws, you have the right to know or obtain a copy of the Personal Data we process about you.
 - If you are a resident of California, you generally have the right to know the following:
 - The categories of Personal Data we have collected about you;
 - The categories of sources from which the Personal Data was collected;
 - The business or commercial purpose for which the Personal Data was collected or sold;
 - The categories of third parties with whom we disclose that Personal Data to for a business purpose;
 - The specific pieces of Personal Data we collected about you in a format easily understandable to the average consumer (also called a data portability request or a right to obtain data); and
 - in addition, where we “sell” or “share” Personal Data, you have the right to request us to identify, during the past 12 months:
 - The categories of Personal Data that we sold or shared, and the categories of third-party recipients; and
 - The categories of Personal Data disclosed for a business purpose and the categories of recipients.
- **Right of Rectification.** Please [contact us](#) if you believe your information is not accurate or if it changes.
- **Right to Erasure.** In certain circumstances, you have a right to request that we delete your Personal Data.
- **Right to Restrict Processing.** You have the right to restrict the processing of your Personal Data when
 - The accuracy of the Personal Data is contested, for a period enabling the controller to verify the accuracy of the Personal Data.
 - The processing is unlawful and you oppose erasure and request a restriction instead
 - We no longer need the Personal Data, but you need us to keep it for the establishment, exercise, or defense of legal claims.
 - You have objected to us processing the Personal Data, pending resolution of the objection.
- **Right to Portability:** You have right to request that we provide your data in a portable form – generally a commonly-used, machine-readable format.
- **Right to Object.** In certain circumstances, you have the right to object to the processing of your Personal Data where the processing is necessary for performance of a task carried out in the public interest, for our Legitimate Interests, or for the Legitimate Interests of others. You also have the right to object where Personal Data is processed for direct marketing purposes or for scientific or historical research purposes or statistical purposes.
- **Right to Withdraw Consent.** If you have provided your consent to the collection, processing, and transfer of your Personal Data, you may have the right to fully or partially withdraw your consent, which would then apply from

that point forward.

Other California Privacy Rights.

- **Right to Limit Use and Disclosure of Sensitive Personal Information.** We only use your Sensitive Personal Data where reasonably necessary to perform services or where you might reasonably expect us to use it for and not for other unrelated purposes. The right to limit use and disclosure only applies where we would use or disclose your Sensitive Personal Data otherwise.
- **Right to Non-Discrimination.** We will not discriminate against you for exercising any of your rights under any Privacy Laws.

Please also be aware that depending on the laws that apply, there may be exceptions or limits to your rights. If we do not honor your request, we will explain our reasons.

Complaints

If you believe that your rights relating to your Personal Data have been violated, you may lodge a complaint with us by contacting us through the [Contact Us](#) section below.

Depending on the laws in your country, you may also submit a complaint to your legal authorities. Please see here for a list: (provided for convenience, we do not monitor it).

<https://globalprivacyassembly.org/participation-in-the-assembly/members-online/>

How to Submit Your Requests for U.S. State Residents

If you are a resident of a U.S. state that has Privacy Laws and would like to exercise your rights as described above, you may do so via any of the methods described below:

- Calling us at (877) 495-2198; or
- Sending an email to privacy@global.crawco.com

Updates to this Notice

We review our Notice regularly and will place any updates on our website and in relevant communications. The effective date listed at the top of this Notice will also be the most recent date this Notice was updated.

Contact Us

For more information, or if you have any questions or concerns regarding this Notice or how we handle your information you may contact us using the information below.

Global Privacy Office

Specific Contacts:

Dr. K Royal, Global Chief Privacy Officer and Deputy General Counsel

Jordan Hall, Global Data Protection Officer

Email: privacy@global.crawco.com

Address: 5335 Triangle Parkway NW, Peachtree Corners, GA 30092, USA

For region-specific inquiries (e.g., EU/EEA, UK, Australia, or Canada), please email us at privacy@global.crawco.com, and we will direct your query to the appropriate regional privacy office.