

BROOKS AUTOMATION, INC.

RECRUITMENT PRIVACY NOTICE

Introduction and scope of privacy notice

This Recruitment Privacy Notice explains the type of information Brooks Automation, Inc and its affiliates and subsidiaries (collectively "Brooks" or "we") process in the context of recruitment, why we are processing it and how that processing may affect you.

What do we mean by "personal data" and "processing"?

"Personal data" is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

"Processing" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it or deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection in some jurisdictions.

Your personal data

We process your personal data for the purposes of fulfilling our recruitment practices. Some of the personal data that we process about you comes from you. For example, you tell us your contact details. Other personal data about you is generated from references and third-party companies such as recruitment agencies. Your personal data will be seen internally by managers, administrators and HR.

How long do we keep your personal data?

If you are successful in your application your data will be kept on your personnel file. If you are unsuccessful, your data will normally be destroyed twelve months after you have been informed that you were unsuccessful.

Transfers of personal data outside of the country in which you are located

We are headquartered in the United States and have offices around the world. Therefore, we may transfer your personal data outside of the country in which you are located to members of our group or to processors. Where necessary, these transfers are covered by intra-group transfer agreements or data processing agreements. If you wish to see details of these safeguards, please contact privacy@brooks.com.

Contact details

In processing your data, we, and in some cases our group companies, may act as a data controller. Please contact us at privacy@brooks.com if you have any questions.

Legal grounds for processing personal data

What are the grounds for processing?

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. Two of those grounds can be summarised as Legal Obligation and Legitimate Interests. We outline what those terms mean below:

Term	Ground for processing	Explanation
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.

Processing sensitive personal data

If we process sensitive personal data about you, as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one of the grounds for processing sensitive personal data applies, including (for example) that the processing is for equality and diversity purposes to the extent permitted by law.

Further information on the data we process and our purposes

Examples of the data and the grounds on which we process data are in the table below. The examples in the table cannot, of course, be exhaustive.

Purpose	Examples of personal data that may be processed	Grounds for processing
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or, insofar as required or permitted by local law, background checks and any information connected with your right to work. If relevant, and insofar as permitted or	Legal obligation Legitimate interests

Purpose	Examples of personal data that may be processed	Grounds for processing
	required by local law, we may also process information concerning your health, any disability and in connection with any adjustments to working arrangements.	
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin	Legitimate interests
Security	CCTV images	Legal obligation Legitimate interests
Monitoring of diversity and equal opportunities	Insofar as permitted and/or required by local law information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age	Legitimate interests

Who gets to see your data?

Your personal data may be disclosed to managers, HR and administrators for employment, administrative and management purposes as mentioned in this document. We may also disclose this to other members of our group.

Access to your personal data and other rights

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

Depending on the country in which you are located, you may have the following rights:

- a right to make a “subject access request;
- a right to have your personal data rectified or erased, to object to its processing, or to have its processing restricted;
- a right to be given your data in a machine-readable format for transmitting to another data controller.

We are unlikely to rely on consent as a ground for processing. However, if we do, you may withdraw consent at any time — though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

Complaints

If you have complaints relating to our processing of your personal data, you should raise these with HR in the first instance or contact privacy@brooks.com.

You may also raise complaints with the statutory regulator in your jurisdiction.

