

## NGUKL Applicant Privacy Notice

We at NGUKL (“we”, “us”, “our”, “Northrop Grumman”) respect your concerns about privacy. This Privacy Notice describes the information practices Northrop Grumman as the data controller to which you are applying for employment. It also describes the types of information we maintain, how we may use the information, how we secure it, with whom we may share it and the choices and rights available to you regarding our use of the information.

This Notice is only a supplement to Northrop Grumman’s general website privacy policy, which can be found [here](#).

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### **Information We Maintain**

The types of personal information we may collect are:

- Contact information (e.g. name, postal address, telephone number and email address);
- Employment information (e.g. employer, title, division, military rank);
- Other personal information (e.g. citizenship, immigration status, passport verification, security clearances, disability status, civil or criminal court history, driving & vehicle licensing history);
- C.V. information (e.g. employment history, work authorization information, salary history, education history, certifications);
- If you are successful with your application we collect employee dependents names and employee dependents dates of birth (where applicable) for the provision of employee benefits;
- Other personal information found in content that users provide.

**How We Use the Information We Maintain**

Northrop Grumman will use the personal information you provide with your application for purposes of considering you for a position at Northrop Grumman, and if you are offered a job or become employed by Northrop Grumman, for employment-related purposes. The legal basis of applicant data processing is deemed necessary for the performance of a contract with the data subject or to take steps to enter into a contract. For successful applicants we will conduct background investigations that are necessary for the purposes of the legitimate interests pursued by Northrop Grumman as the controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

By applying for a position, you agree that we may use your personal information for recruitment and if you are hired, employment-related purposes. Your personal information will not be shared with others for non-recruitment or employment purposes except as consistent with our general website privacy policy. Failure to provide your personal information will prevent us from contacting you and evaluating your application for the job.

**Information We Share**

Applicant Information is handled strictly on a need-to-know basis. Individuals with access to Applicant Information may include members of our Human Resource team as well as hiring managers. If offered a position, we may share your Applicant Information with our Northrop Grumman affiliated companies, and third parties who perform services on our behalf. This includes Northrop Grumman affiliates and service providers located in countries other than the country in which the personal information was collected. These service providers may also collect some of your information (e.g., your personal contact information) directly from you but they are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. For a list of relevant service providers, please see below:

<b>Service Providers</b>	<b>Service</b>	<b>Country of Processing</b>
Sterling Talent Solutions	Applicant Background Investigations	United States of America and Canada
Docusign Inc.	Provision of eSignature facility for employee contracts and benefit forms	United States of America
Optamor Limited	Job application processing	United Kingdom
ITS Software Systems Ltd. Trading as Eploy	Job Application processing	United Kingdom
Workday	Job application processing	United States, Ireland, New Zealand
Accenture	Job Application processing	United States

We may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government entities, and (iii) in connection with an investigation of suspected or actual criminal offenses.

## **Your Rights**

Once you have applied for a position, you may request access to correct or update your personal information. A new C.V. or resume may be submitted when applying for other positions. If you wish to have your Applicant Information deleted or object to processing at any time, please contact us at [Privacy@euro.ngc.com](mailto:Privacy@euro.ngc.com). To aid us in locating your applicant information, please be sure to include your name and contact information in your request. Applicants maintain the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or of an alleged infringement of the GDPR if they feel that appropriate measures to protect their personal information or address their concerns have not been taken.

## **Data Transfers**

We may transfer your Applicant Information to countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

If you are located in the EEA, we comply with applicable legal requirements by protecting your Applicant Information when it is transferred to countries outside of the EEA that have not been recognized by the European Commission as providing an adequate level of data protection. We take all appropriate steps to ensure such a level, including by concluding data transfer agreements incorporating the European Commission's Standard Contractual Clauses and, in case of transfers to the U.S., by transferring your Applicant Information to a company certified under the EU-U.S. Privacy Shield framework developed by the U.S. Department of Commerce and the European Commission regarding the transfer of personal information from the EEA to the U.S. In particular, with respect to transfers of Applicant Information to our affiliates in the U.S., our parent company Northrop Grumman Corporation and its [U.S. subsidiaries](#) are certified under the EU-U.S. Privacy Shield framework. Click [here](#) to view our EU-U.S. Privacy Shield Privacy Notice.

Applicant information that is shared with third party processors in Canada is done so under the adequacy decision granted by the Commission of the European Community in 2001 declaring that Canada's Personal Information Protection and Electronic Documents Act (the "PIPEDA") provided an adequate level of protection for personal data transferred from the EU to organizations in Canada.

If you are located outside the EEA, you acknowledge that we may transfer the information to countries in which the laws may not offer the same level of data protection as the laws of your own country.

## **How We Protect your Information**

We maintain appropriate technical and organizational safeguards designed to protect your Applicant Information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

## **Data Retention**

Northrop Grumman may retain your Applicant Information only for evaluation for employment in connection with the application process for a period of 6 months from the end of the recruitment process for the job position you applied for. If your application is successful, Northrop Grumman

will retain your Applicant Information for as long as is necessary in connection with any employment relationship.

**Updates to this Privacy Notice**

This Privacy Notice may be updated periodically to reflect changes in our privacy and data protection practices. We will notify you of any changes to this Privacy Notice by indicating at the top of the notice when it was most recently updated.

**How to Contact Us**

If you would like to exercise your rights or obtain a copy of our data transfer agreements, or if you have any questions or comments about this Privacy Notice or the processing of personal information in connection with your application, please contact us at: [Privacy@euro.ngc.com](mailto:Privacy@euro.ngc.com).