

# Job Applicant Privacy Notice and Policy

# for North America

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# **Introduction and Purpose**

The purpose of this Privacy Notice and Policy is to provide job applicants or candidates with details about what information is collected during the application and recruitment process, as well as why we collect it, how we use that information, and how to access and update that information.

For the purposes of this Privacy Notice and Policy, CF Industries ("CF", WE", "US", "OUR") will have possession, custody or control of your personal information, and is responsible for determining what personal information is collected, how it is handled, stored and how long it is retained. Personal information constitutes any information about any identifiable individual and includes information that identifies you as an individual or relates to an identifiable person ("Personal Information").

CF's policy is to protect your privacy under data protection laws when we collect, store and/or process your Personal Information.

# **Applicability of this Notice**

This Privacy Notice and Policy applies to all job applicants ("YOU") whose Personal Information we collect, use, store, process, retain or disclose for the purposes of recruiting for a job at CF. The notice sets out how we manage your Personal Information in accordance with Canadian and U.S. privacy and data protection laws, including the Alberta Personal Information Protection Act, the Personal Information Protection and Electronic Documents Act (Canada) and any other provincial, state or Federal privacy legislation as applicable. CF's policy is to collect, use and disclose Personal Information only for the purposes set out in this Privacy Notice and Policy.

Should there be, in a specific case, any inconsistency between this Privacy Notice and Policy and relevant privacy laws, this Privacy Notice and Policy shall be interpreted, in respect of that case, to give effect to, and comply with such legislation.

# Types of Information We Collect and Process

At times during your application process we may collect and process the following categories of Personal Information about you:

#### Contact Information

- Name(s)
- Address(es)
- Email address(es)
- Contact details including mobile telephone number(s)

#### Biographical and Identification Information

Date of birth

- Passport information
- Driver's license, National ID, or State or Provincial ID information
- Information that may be provided during assessments you may take as part of your interview process
- Screening information from outside parties (as required) to include background, employment history, certifications and education
- Names and contact information of your references (or referees), including length
  of time known, relationship to you, job title, dates of employment, and comments
  about your suitability

#### Identity and Background Information

- Address history (lived/worked)
- Criminal history records
- Details of education and qualifications and certifications
- Career history
- Psychometric test results
- Right to work, residency and/or other visa information
- Curriculum Vitae (CV) or resume and information contained in any associated correspondence
- Images or photographs
- Personal details contained in any application form
- Handwritten and computer-generated evaluative notes and decisions from group activities, presentation, pre-interview tasks and interviews
- Preferences relating to job location, operating hours and salary
- Conflicts of interests (including where related to family networks)
- Details about how you heard about the position or information related to the type of employment you are seeking
- Information provided by third-party vendors (such as recruiting firms)
- Publicly available information
- For US job applicants only, voluntary EEO information, such as race, sex, disability, veteran status

#### Financial Information

Bank account details

#### Sensitive Information

- Physical, mental health, and wellness information (including occupational health requirements, day-to-day health concerns which we might ought to be aware of (e.g. if you are diabetic or epileptic), dietary requirements, allergies, etc.
- Image or photographs which reveal racial or ethnic origin or religious beliefs for instance
- Any sensitive or demographic information received during background checks, including information provided by third parties

#### Security, Location and Access Information

 Information (including image and biometric data) captured or recorded by electronic card access systems, CCTV and other security control systems (where applicable)

#### <u>Travel and Expenses Information</u>

- Transaction records
- Visa, passport and insurance details
- Flight and accommodation booking information
- Travel itinerary information, including travel preference and membership numbers

CF may additionally collect further information as a condition of employment. Where CF collects such information as a condition of employment, it is CF's policy to comply with all applicable law.

## Purposes of Collection, Use and Disclosure of Personal Information

CF collects and processes your information to make decisions about your employment with the organization. This is necessary to fully evaluate your credentials and fitness for the role. If you are hired by CF, the information gathered during the recruiting process will become part of your employment file.

Your information will be used and/or disclosed by CF for the purposes of carrying out the application and recruiting process, which may include:

#### Recruitment and workforce planning

- Pre-employment and employment contracts processing
- Communications with you about our recruiting and informing you of other career opportunities at CF
- Assessing your skills, qualifications and potential interests against our career opportunities, including your suitability for the role
- Recruitment and workforce planning
- Verifying your information and carrying out background checks
- Keeping records related to our hiring or application process
- Administering and complying with any potential employment or other contract
- Administering any potential role that you perform for us
- Keeping a record of your right to work in the U.S. or Canada (as relevant) and any other legal or regulatory requirements including reporting
- Where relevant and permitted by law, verification and vetting including criminal background checks
- General human resources employment management and administration
- Improving CF's application and recruiting processes

#### Security, Governance, and Legal and Regulatory Compliance and Responsibilities

- Monitoring the security of our physical premises and systems, networks and applications
- Ensuring compliance with our policies and procedures
- Complying with applicable laws, regulations, legal processes or enforceable governmental requests (when required)
- Protecting the rights and property of CF, our employees, applicants, candidates, or the public as required or permitted by law
- Conducting internal investigations with respect to legal compliance, suspected misuse of or the general security of our assets and information such as fraud detection and prevention, including through the use of computer forensics
- Conducting internal or external audits of our records and information, operations and legal compliance
- Responding to employment and industrial relations matters where required by applicable law, including grievances, arbitrations, negotiations, elections and strikes (if applicable)

## **Sharing of Your Personal Information**

It is possible that your information could be shared with our affiliates, subsidiaries, or joint ventures in North America for operational purposes, including for CF's administrative, accounting, personnel and marketing needs, described in more detail below under "TRANSFERS TO CF ENTITIES". We may also share the personal data we collect about you with:

- Third-party suppliers who provide services on our behalf and where such information is necessary to provide such services
- Law enforcement, governmental and regulatory bodies for compliance with our legal obligations
- Courts and to other organizations where that is necessary for the administration of justice, to protect and defend the rights, property or personal safety of CF Enterprises, employees, staff, agency workers and customers of our Services
- Your references or referees or other people that you request we share your Personal Information with your consent
- Other organizations where you request with your consent that we do this, for example to other companies and organizations when you have applied for a role there and where you list us as a reference or referee

#### Additional Information About with Whom Information Is Shared

We may disclose your Personal Information to third-party suppliers, vendors or service providers in the United States and Canada who provide services on our behalf, and other more general service providers such as organizations and businesses who provide document storage and IT services to us. Please refer to the 'PURPOSES OF COLLECTION, USE AND

DISCLOSURE OF PERSONAL INFORMATION' heading above for additional detail regarding the purposes of such transfer and/or disclosure.

#### Transfers to CF Entities

Your Personal Information may be transferred among companies in the CF legal entity group. This is usually for the purposes of performing staff and benefit administration or otherwise to allow for the efficient management of Employees.

# Safeguards and Access to Personal Information By Law Enforcement And National Security Officials

We will endeavor to ensure that suitable safeguards are in place before we transfer your Personal Information to other CF entities within Canada or the U.S., or any service providers within or outside those countries. Safeguards can include contractual obligations imposed on the recipients of your Personal Information. Those obligations require the recipient to protect your Personal Information to the standard required in the originating country. Please note that your Personal Information may be subject to access by law enforcement and national security officials in each of those countries.

### Monitoring Involving Processing of Your Personal Information

In this section monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person face-to-face meetings and other communications. We may monitor where permitted by law and we will do this where the law requires it. Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on corporate customer accounts) and for quality control and staff training purposes. Some of our monitoring may check for obscene or profane content in communications. Monitoring occurs pursuant to the CF Mobile Device Acceptable Use Technical Policy and the Computer and Network Usage Technical Policy.

#### Do You Have to Provide Us with Your Personal Information?

We cannot consider you for employment unless we have your Personal Information. We have legal/statutory reasons to obtain your Personal Information as mandated by employment laws and other applicable laws mean we do have to collect information from you. Where provision of Personal Information by you to us is optional, we will make this clear, for instance in application forms we will explain if some data fields are optional and can be left blank.

#### **Retention of Your Information**

CF will make every effort not to hold your Personal Information longer than is reasonably necessary to fulfil the purposes indicated above. Unless we explain otherwise to you, we will hold your Personal Information necessary to consider your application in compliance with the CF Record Management Policy. If your application process is unsuccessful, then CF will hold your Personal Information for the minimum period of time (according to laws and regulations). We retain this information for a number of reasons, including to comply with legal retention periods, in case we face a legal challenge regarding your application for employment, to consider you for future employment opportunities, and to better understand our recruiting and application processes.

If you do not want CF to retain your information (that is not otherwise subject to a legal retention period) beyond your application for employment, such as for consideration of other future roles, please contact cfhire@cfindustries.com.

# **Updating Your Personal Information**

Since we use your Personal Information to consider you for employment with CF, it is important that the information be accurate and up-to-date. If any of your Personal Information changes, please update your information as needed.

# Data Anonymization and Use of Aggregated Information

Your Personal Information may be converted into statistical or aggregated data which becomes anonymized and cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this Privacy Notice and Policy.

#### Additional Provisions for Canadian Residents

Under certain circumstances and in certain jurisdictions, you may have the right to request access to certain aspects of your Personal Information, which is in CF's custody or under its control. Please contact cfhire@cfindustries.com for more information regarding how to request such access.

Each province and territory in Canada has a regulatory body responsible for enforcing provincial / territorial data protection laws, as well as there is a federal regulator responsible for enforcing federal data protection laws.

#### **How to Contact Us**

Any questions regarding this Privacy Notice and Policy or the collection, use and/or disclosure of your Personal Information as set out herein should be directed to cfhire@cfindustries.com.