

EFFECTIVE DATE: 25 March 2025

**PRIVACY NOTICE REGARDING APPLICANT PERSONAL DATA PROCESSED
BY OUR AUSTRALIAN OFFICES
(RECRUITMENT PRIVACY NOTICE)**

This Privacy Notice sets out the following information:

1. [Who Collects Your Personal Data;](#)
2. [Contact Details;](#)
3. [Sources of Personal Data;](#)
4. [Categories Of Personal Data Processed and Permitted Uses;](#)
5. [Management of Personal Data;](#)
6. [How We Share Your Personal Data;](#)
7. [International Transfers of Personal Data;](#)
8. [Your Rights;](#) and
9. [Definitions](#)

INTRODUCTION

This Privacy Notice describes the ways in which Squire Patton Boggs (“the Firm,” “we”, “us”) processes and protects the personal data of prospective partners and employees (collectively, “Applicants”) who submit applications for consideration and processing by any of our Australian offices (“our AU Offices”) in accordance with the Privacy Act 1988, the Australian Privacy Principles and related regulations and guidance (“Applicable Data Protection Law”).

[More information \[1\]](#)

By submitting an application for a position in our AU Offices, you are consenting to our collection, use and transfer of your personal data as set out in this Privacy Notice.

If you do not agree with this Privacy Notice, please do not continue to submit your application.

1. WHO COLLECTS YOUR PERSONAL DATA

Squire Patton Boggs (UK) LLP and its affiliate Squire Patton Boggs (AU), a partnership organised under the laws of Australia. A list of the Firm's AU Offices and relevant contact details are provided in [Annex 1](#) to this Privacy Notice.

2. CONTACT DETAILS

By Phone: +61 8 9429 7444

By Mail: Squire Patton Boggs
 Level 11 Brookfield Place
 125 St Georges Terrace
 Perth, WA 6000

By email: DataProtectionOfficer@squirepb.com

3. SOURCES OF PERSONAL DATA

[More information \[2\]](#)

We generally obtain personal data concerning Applicants from the sources set out below.

Categories of Personal Data	Source
Your contact information, information about your experience and qualifications and other information relevant to the recruitment process and the position for which you are applying	Provided by you electronically, in writing, or verbally OR Provided by the recruitment agency with which you are associated
Evaluations from interviews in which you participate	Provided by those who have interviewed you
Recorded video interviews, written questions and answers and skills tests that we administer and evaluate	Provided by you via digital platforms hosted by third parties
Background screening and other pre-employment checks, as permitted or otherwise authorised by applicable laws	Third-party service providers who collect your personal data directly from you, for example, digital identity service providers to verify your identity and perform Right to Work checks. Where you provide personal data directly to third parties, you should ensure you also review their privacy notice.
References	Referees that you authorize us to contact
Other personal and professional information	Public areas of third-party professional social networks and websites, for example LinkedIn, Xing or professional directories

4. CATEGORIES OF PERSONAL DATA PROCESSED AND PERMITTED USES

The Firm’s AU Offices may process your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes that are related to the primary purpose and in other circumstances authorized by Applicable Data Protection Law.

The Firm’s primary purpose for processing your personal data is to carry out its recruitment activities to attract new talent to the Firm, including partners, associates and staff as well as independent contractors and consultants.

The types of personal data that we process are those necessary for us to evaluate your application as part of the recruitment process. The categories of personal data that the Firm processes about you for the purpose of recruitment include the following:

Initial Screening of Applications	
Categories of Personal Data	Permitted Uses
Identification data and contact details (i.e. name, mobile telephone number, email address).	Contact you about your application.
CV/Résumé (or profile on professional social networks or websites), details of your qualifications and experience, employment history (including job titles, salary and benefits packages and any relevant working hours), interests, information about your academic history, qualifications including professional certifications and credentials, language skills.	Consider your qualifications, skills and experience to ensure they are suitable for the position.

Further Data Which May Be Requested During Applicant Assessment and Selection	
Categories of Personal Data	Permitted Uses
Detailed evidence of your relevant skills and details of your previous experiences and the career choices you have made (usually assessed at a face-to-face or telephone interview).	Consider your suitability for the position.
Video recording of your responses to interview questions using our digital assessment platform	Consider your suitability for the position

Further Data Which May Be Requested During Applicant Assessment and Selection	
Categories of Personal Data	Permitted Uses
Residential addresses (current and, in some cases, previous) and background checks.	Assessment of senior hire's suitability for the position.
For more senior fee earning Applicants: details of prior and, where pertinent, projected client base and activity including details of acting for any parties that are adverse to our Firm or its predecessor firms.	Evaluate the business case and consider whether Applicants might pose a conflict of interest.
For more senior fee earning Applicants: details of ownership interests in any client.	Consider whether your personal business interests are compatible with those of the Firm.
Details of bar admissions and relevant reference numbers.	Consider your qualifications for the position.
For the most senior profiles (Partners): information relating to the candidate's possible involvement in administrative proceedings, insolvency proceedings, arbitration proceedings or before the courts	Ensure that senior profiles available for membership in the firm are qualified and able to take on financial responsibilities.

Further Data Which May Be Requested Prior to Start of Employment	
Categories of Personal Data	Permitted Uses
References from clients (for senior hires only).	Assessment of senior hire's suitability for the position
Copy of your passport or other government-issued identity documents.	Verify that you have the right to work in Australia

Failure to Provide Information

If you do not provide us with some or all the above information, we may not be able to consider your application.

Sensitive Personal Data

Sensitive personal data, as defined under Applicable Data Protection Law, includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, criminal record and health information about an individual.

We do not intentionally collect sensitive information as part of the recruitment process except in certain limited circumstances, e.g., where required by law or otherwise as required to meet our legal professional obligations. In some limited circumstances, we may inadvertently collect your sensitive information in connection with proposed data collections set out above, for example your name or resume may provide indications regarding your racial or ethnic background, political or trade union association, or health status to the extent relevant to your employment, your potential role at the firm or your career. Any such sensitive information is collected only for the purposes set out above and should only be provided by you voluntarily and with your consent.

The Firm will not take responsibility for any personal data provided by you that is outside the requested or permitted range of personal data. For example, where sensitive personal data are not requested or relevant to the position, we will decline to process the data and delete it from our system.

5. MANAGEMENT OF PERSONAL DATA

[More information \[3\]](#)

The Firm retains your personal data for the period necessary to fulfil the purposes set out in this Privacy Notice, as required by applicable law or to establish, exercise or defend potential legal claims or to pursue our legitimate interests.

As a law firm, we take our responsibilities and obligations to protect the personal data of our potential personnel very seriously. We have a robust information security management program in place to protect the personal data and other information that we process and have achieved ISO27001 certification of the Firm’s technical and organisational controls across a broad spectrum of systems and processes.

6. HOW WE SHARE YOUR PERSONAL DATA

6.1 Intra-Group

Relevant personal data of Applicants is shared with authorized Firm personnel within and outside of Australia.

<i>Purpose of the Transfers</i>	<i>Recipients</i>
Facilitate interviews with Firm personnel involved in the hiring decision More information [4]	Authorized Firm personnel including selected interviewers as relevant to a particular position
Administer the hiring and compensation policies in a fair and coordinated manner across all our offices and practice groups worldwide	Relevant HR and Finance personnel and others involved in managing the Firm
Gain approval to make individual hires	The Firm’s internal management platform hosted by the Firm in the United States.

<i>Purpose of the Transfers</i>	<i>Recipients</i>
Communications and general business management	Email systems, conflict management systems, finance systems, and HR management systems that are hosted by the Firm on servers located in Australia, Singapore, the UK and/or the United States.

6.2 *Third Parties*

Our AU Offices may also share the personal data of Applicants with trusted service providers pursuant to contractual arrangements with them, which will include appropriate safeguards to protect any personal data that we share with them.

<i>Purpose of the Transfers</i>	<i>Recipients (examples)</i>
Manage the recruitment process	IT service providers, talent management software providers, HR information systems and referencing and background check firms.
Provide services to you and, in some cases, your family members	The Firm's business partners, acting as independent data controllers, such as recruitment agencies; accountants; banks involved in processing expense reimbursements; telecommunications and conference companies; relocation firms; travel agencies, hotels, airlines, car rental agencies and other companies involved in providing corporate travel services.

We will only transfer your personal information to third parties, other than those listed above, in the following circumstances:

- To protect or defend the legal rights or property of Squire Patton Boggs, our affiliated entities or their employees, agents and contractors (including enforcement of our agreements)
- To protect the safety and security of our website and clients
- To protect against fraud or for risk management purposes
- If we believe your actions violate this Privacy Notice
- To comply with law or legal process
- To enable the sale of Squire Patton Boggs or its assets
- To opt out of Marketing and Promotional Use

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Due to the global nature of our operations, your personal data may be transferred to and shared with authorised Firm personnel and with third-party service providers located outside of Australia.

Our AU Offices will not send your personal information to recipients outside of Australia without:

- Taking reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles and this Privacy Policy;
- Obtaining your consent;
- Otherwise complying with the Privacy Act.

When you submit an application to us, you are consenting to any such transfers, provided that they are otherwise in accordance with this Privacy Notice.

You can access a list of Squire Patton Boggs' global offices [here](#).

8. YOUR RIGHTS

The Applicable Data Protection Laws provide certain rights to individuals in relation to their personal data. These include the rights to:

Access	You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please phone us on +61 8 9429 7444. We may request that you cover our reasonable costs for providing you with access.
Rectification	<p>We want to make sure that your personal information is up to date. You may ask us to correct or remove information which you think is inaccurate by updating your information using the Recruitment Platform or by contacting us using the information set out in Section 2 of this Privacy Notice.</p> <p>We are not responsible for any problems that may arise if you do not give us accurate, truthful or complete information, or if you fail to update such information. We will reject and delete any entry that we believe in good faith to be false, fraudulent or inconsistent with this Privacy Notice.</p>

If you are concerned that we may have breached the Australian Privacy Principles, please phone us on +61 8 9429 7444. We will undertake a reasonable and expeditious assessment of the concern and suggest relevant resolution processes.

If you have any queries or concerns about your rights, please contact the Australian Information Commissioner.

9. DEFINITIONS

Applicable Data Protection Law	means the Privacy Act 1988 and the Australian Privacy Principles.
Applicant	as defined in the Introduction to this Privacy Notice.
Employee	includes full-time employees, part-time employees, temporary employees, reinstated employees, rehired employees and retired and former employees.
Personal Data	means any information relating to an identified or identifiable natural person (“data subject”) as set out in the Privacy Act 1988 and the Australian Privacy Principles.
Processing	means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means (e.g., computers), such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Partner	means an individual authorised by the Firm to use the title of partner.
Potential Personnel	means (for the purposes of this Privacy Notice) potential employees and/or partners, as well as independent contractors or consultants.
Recipient	means an individual or entity to whom or to which personal data are transmitted or disclosed.
Recruitment Platform	means a dedicated, online talent management platform provided by cvMail/Thomson Reuters and hosted in the United Kingdom.

MORE INFORMATION

[1]	Squire Patton Boggs is a global law firm operating under a Swiss verein structure that comprises Squire Patton Boggs (UK) LLP (of which our AU Offices are a part), Squire Patton Boggs (US) LLP and other constituent legal entities. A full description of our organisation listing all our offices worldwide is provided in the Legal Notices .	Back
[2]	So far as is possible, we use the Recruitment Platform to collect and process applications for available positions in the Firm. This Recruitment Platform enables us to manage the personal data of Applicants and share it with relevant personnel within the Firm in a secure fashion and in accordance with our obligations under Applicable Data Protection Law. We use the Recruitment Platform primarily to structure, store and enable the sharing of any personal	Back

	<p>data that you provide us within the Firm, as appropriate. It does not involve any decision-making about Applicants based solely on automated processing or profiling.</p> <p>We also sometimes use email to process applications for available positions in the Firm where technically necessary. This assists us in collecting the personal data of Applicants where use of the Recruitment Platform is not available and in managing certain practical aspects of our data processing, such as organising interviews and receiving evaluation information.</p>	
[3]	<p>It is our general policy to retain potential personnel records until the end of Firm’s recruitment process regarding your application, extended to cover the relevant statutory period or for the duration of any relevant legal proceedings. More specifically, your personal data will be retained as follows:</p> <p>If you submit your own personal data and are an unsuccessful Applicant:</p> <ul style="list-style-type: none"> • Our policy is to delete your personal data in its entirety after the expiration of 180 days following the conclusion of the recruitment process for the role for which you have applied, unless you tell us that you are happy for us to retain your data for a further 180 days in case a suitable opportunity arises in the future. <p>If you apply via a third-party staffing or recruiting company and are an unsuccessful Applicant:</p> <ul style="list-style-type: none"> • Our policy is to delete your personal data after the expiration of 180 days following the conclusion of the recruitment process for the role for which you have applied, save that your name, email address and the name of the agency that submitted your name will be retained for 12 months. <p>This is to enable us to meet our contractual obligations with the third-party staffing and recruiting company that referred you to us.</p> <p>We delete any introductory communications that we may have with you via social media sites, such as LinkedIn, within one month following of the close of our dialogue with you using such sites.</p>	Back
[4]	<p>Depending on the Applicant and the open position for which they are applying, personal data may be shared globally as relevant, including with members of the Global Board, the Legal Personnel Committee, the relevant Practice Group Leader or the Director of business unit, the Office Managing Partner, and/or the relevant Industry Group Leader.</p>	Back

Annex 1: Squire Patton Boggs AU Offices

Squire Patton Boggs

Level 11, Brookfield Place
125 St Georges Terrace
Perth WA 6000
Australia
+61 8 9429 7444

Squire Patton Boggs

Level 17
88 Phillip Street
Sydney NSW 2000
Australia