

EFFECTIVE DATE: 22 July 2026

**PRIVACY NOTICE REGARDING APPLICANT PERSONAL DATA PROCESSED
PURSUANT TO THE DIFC-DPL**

(RECRUITMENT PRIVACY NOTICE)

In line with the transparency requirements of Articles 9 and 29 to 31 of the Dubai International Financial Centre Data Protection Law, DIFC Law No. 5 of 2020 (the “DIFC-DPL”), this Privacy Notice sets out the following information:

1. [Identification of the Data Controller;](#)
2. [Contact Details of our Local Data Privacy Contact;](#)
3. [Sources of Personal Data;](#)
4. [Categories Of Personal Data Processed, Purposes and Legal Bases For The Firm's Processing;](#)
5. [Retention of Personal Data;](#)
6. [How We Share Your Data within the Firm and with Third Parties;](#)
7. [International Transfers of Personal Data;](#)
8. [Rights of Individuals in Relation to their Personal Data;](#) and
9. [Definitions](#)

INTRODUCTION

This Privacy Notice describes the ways in which Squire Patton Boggs (“the Firm”, we, “us”, “our”), through its Dubai International Financial Centre branch office and legal entities listed in [Annex 1](#) (the “Affected Offices”) processes and protects the personal data of prospective partners and employees (collectively, “Applicants”) who submit applications for consideration and processing by its Dubai International Financial Centre branch office.

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

1. IDENTIFICATION OF THE DATA CONTROLLER

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

If you have applied to one or more of our Affected Offices, the relevant data controller is the Squire Patton Boggs legal entity to which you applied.

For the purposes of this Privacy Notice, the principal point of contact in relation to compliance with the DIFC-DPL is Squire Patton Boggs (MEA) LLP, acting through its Dubai International Financial Centre branch at Burj Daman Office Tower, Level 10, P.O. Box 111713, Dubai, United Arab Emirates.

2. CONTACT DETAILS OF OUR LOCAL DATA PRIVACY CONTACT

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

By email: DIFC_Privacy@squirepb.com

By post: Attn: Data Privacy Contact
Squire Patton Boggs
Dubai International Financial Centre
Burj Daman Office Tower, Level 10
P.O. Box 111713
Dubai, United Arab Emirates

3. SOURCES OF PERSONAL DATA

[More information \[4\]](#)

We generally obtain Applicant Personal Data directly from you, create certain Personal Data during the recruitment process, and obtain Personal Data from third-party sources, as described 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	Digital platforms hosted by third parties

Categories of Personal Data	Source
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 and data protection 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, PURPOSES AND LEGAL BASIS FOR THE FIRM'S PROCESSING**

The Firm processes your personal data 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.

Our legal basis for doing so will vary with the type of data processing activity involved. [More information \[5\]](#)

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 special categories of personal data are not requested or relevant to the position, we will decline to process the data and delete it from our system.

To the extent not addressed below, we will point out, at the time of data collection, if the processing of your personal data by the Firm is a statutory or contractual requirement, whether you are obligated to provide the personal data and the possible consequences of your failure to do so. In circumstances where consent is the basis for the Firm to process your personal data, we will request this from you at the point of data collection.

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:	We may use your personal data to:	Our lawful basis for doing so is:	Where applicable, our legitimate interests are to:
Identification data (i.e. name, mobile telephone number, email address).	Contact you about your application to us.	Article 10(b): taking steps at your request before entering into a contract, where you have applied or asked to be considered for a role; OR Article 10(f): legitimate interests, where we identify or contact you about a role before you have asked us to do so.	Identify and communicate with potential candidates and administer an effective recruitment process.
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.	Article 10(b): taking steps at your request before entering into a contract, where you have applied or asked to be considered for a role; OR Article 10(f): legitimate interests, where we assess an individual who has been referred or otherwise identified as a potential candidate.	Identify, assess and select candidates with suitable qualifications, skills and experience for roles with the Firm.

Further Data Which May Be Requested During Applicant Assessment and Selection			
Categories of personal data:	We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are to:
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.	Article 10(b): taking steps at your request before entering into a contract, where you have applied or asked to be considered for a role; OR Article 10(f): legitimate interests, where we assess an individual who has been referred or otherwise identified as a potential candidate.	Identify and select candidates with the skills and experience required for roles with the Firm.
Residential addresses (current and, in some cases, previous) and background checks.	Consider your background and history.	Article 10(b), where necessary to take steps at your request before entering into a contract; OR Article 10(c), where verification is required by Applicable Law; OR Article 10(f), where the Firm conducts proportionate verification in pursuit of its legitimate interests.	Verify candidates' identities and protect the Firm and its clients against fraud, dishonesty and other material recruitment risks.
For more senior fee earning Applicants:	Evaluate the business case and	Article 10(b), where the processing is	Assessment of senior hire's

Further Data Which May Be Requested During Applicant Assessment and Selection			
Categories of personal data:	We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are to:
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.	consider whether potential clients might pose a conflict of interest.	necessary to take steps at your request before entering into a contract; OR Article 10(f), where the Firm assesses the business case in pursuit of its legitimate interests.	suitability for the position.
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.	Article 10(c), where the processing is necessary to comply with applicable legal or professional conduct obligations; OR Article 10(f), where the Firm conducts the assessment in pursuit of its legitimate interests.	Protect the Firm and its clients by identifying and appropriately managing conflicts of interest and independence concerns.
Details of bar admissions and relevant reference numbers.	Consider your suitability for the position.	Article 10(c), where verification is required by professional admission, licensing or regulatory requirements applicable to the Firm or the relevant role.	N/A
For the most senior profiles (Partners): information relating to the Candidate's possible involvement in	Review your financial history and history (data shared with U.S. and UK offices)	Article 10(c), where the processing is required by Applicable Law or applicable professional or	Protect the Firm and its clients and assess material financial, governance, integrity and

Further Data Which May Be Requested During Applicant Assessment and Selection			
Categories of personal data:	We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are to:
administrative proceedings, insolvency proceedings, arbitration proceedings or before the courts		regulatory requirements; OR Article 10(f), where the Firm conducts a proportionate assessment in pursuit of its legitimate interests. Where the information constitutes criminal-record or other Special Category Personal Data, the Firm will also rely on an applicable condition under Article 11 of the DIFC-DPL.	professional risks associated with appointments to senior positions.

Further Data Which May Be Requested Prior to Start of Employment			
Categories of personal data:	We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are to:
References from clients (for senior hires only).	Consider your suitability for the position	Article 10(b), where obtaining the reference is necessary to take steps at your request before entering into a contract; OR Article 10(f), where the Firm conducts a proportionate reference check in	Verify senior candidates' professional standing, reputation and client-facing experience and manage the risks associated with a senior appointment.

		pursuit of its legitimate interests.	
Copy of your passport or other government-issued identity documents.	Ensure that you have the right to work in the country you have applied to work in.	Article 10(c), to the extent the Processing is necessary to comply with immigration, work-authorisation or right-to-work obligations under Applicable Law in the relevant jurisdiction	N/A

5. RETENTION OF PERSONAL DATA

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

[More information \[6\]](#)

6. HOW WE SHARE YOUR PERSONAL DATA WITHIN THE FIRM AND WITH THIRD PARTIES

6.1 *Intra-Group*

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

[More information \[7\]](#)

<i>Purpose of the Transfers</i>	<i>Recipients</i>
Facilitate interviews with Firm personnel involved in the hiring decision	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

<i>Purpose of the Transfers</i>	<i>Recipients</i>
	hosted by the Firm in the United States
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 the UK and in the United States.

6.2 *Third Parties*

Our Affected Offices 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.

7. **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

7.1 *Intra-Group*

Due to the global nature of our operations, your personal data may be transferred to and shared with authorised Firm personnel in offices outside the DIFC. The transfers are protected by means of international data transfer agreements that incorporate contractual safeguards approved by the Commissioner.

[More information \[8\]](#)

7.2 Third Parties

[More information \[9\]](#)

Some of the third parties with which we share your personal data are located outside the DIFC. Unless the recipients are in countries that have been deemed adequate by the Commissioner, we will ensure that appropriate safeguards are in place before making the transfer.

8. RIGHTS OF INDIVIDUALS IN RELATION TO THEIR PERSONAL DATA

The DIFC-DPL provides certain rights to data subjects in relation to their personal data. These include the rights to:

[More information \[10\]](#)

Access	Request details about the personal data that we process and obtain a copy of the data that we hold about them.	More information [11]
Rectification	Correct or update their personal data.	
Portability	Port personal data that the data subject has provided to us, in machine readable format.	
Erase	Erase the data that we hold about them in some cases.	More information [12]
Restriction	Restrict processing in some cases.	More information [13]
Objection	Object to processing in some cases.	More information [14]
Consent	Decline to consent or withdraw consent.	More information [15]
Non-discrimination	Not be discriminated against for exercising any of their rights	More information [16]

To assist us in complying with our obligation to maintain the accuracy of your personal data, please notify us in writing of any changes to your personal data by updating your information using the Recruitment Platform or contacting the Resourcing Team. Where you have notified us or we otherwise become aware of an inaccuracy in your information, we will take appropriate steps to rectify the inaccuracy.

Any individual wishing to assert his or her rights under the DIFC-DPL should address the relevant request to:

[More information \[17\]](#)

By post: DSAR Manager
Squire Patton Boggs (MEA) LLP
Dubai International Financial Center

Burj Daman Office Tower, Level 10
P.O. Box 111713
Dubai, United Arab Emirates

By email: DataSubjectRequests@squirepb.com

Data subjects also have the right to submit a complaint concerning our processing of their personal data to the Commissioner.

9. DEFINITIONS

Applicant	as defined in the Introduction to this Privacy Notice.
Controller	means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Commissioner	means the person appointed by the President of the DIFC pursuant to Article 43(1) of the DIFC-DPL to administer the law.
DFSA	means the Dubai Financial Services Authority.
DIFC	means the Dubai International Financial Centre.
DIFCA	means the Dubai International Financial Centre Authority.
DIFC-DPL	means the DIFC Data Protection Law, DIFC Law No. 5 of 2020.
DSAR	means Data Subject Action Request, pursuant to the provisions of Articles 33 to 37 of the DIFC-DPL relating to the rights of data subjects under the DIFC-DPL.
Individual	means a human person (also sometimes referred to as a “natural” person).
Employee	includes full-time employees, part-time employees, temporary employees, reinstated employees, rehired employees and retired and former employees.
Joint Controller	means any Controller that jointly determines the purposes and means of processing with another Controller.
Legal Notices	means the Legal Notices page on the Squire Patton Boggs website which hosts this Privacy Notice.
Personal Data	means any information relating to an identified or identifiable individual (a “data subject”). An identifiable individual is one whose identity can

	be established by one or more identifiers (for example, their name) specific to that individual.
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.
Processor	means an individual or entity who or which processes personal data on behalf of a controller.
Profiling	means the automated processing of personal data to evaluate the personal aspects relating to a natural person, in particular to analyse or predict aspects concerning the person's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements.
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.
Third Party	when used to describe a data subject, means an individual who is not part of the Firm.
Third Party Data	means personal data of a third party.
UAE	means the United Arab Emirates.

MORE INFORMATION

[1]	Squire Patton Boggs are a global law firm operating under a Swiss verein structure that comprises Squire Patton Boggs (UK) LLP, Squire Patton Boggs (US) LLP and other constituent legal entities. A full description of our organisation can be found on the Legal Notices page on our website. 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 ISO:27001 certification of the Firm's technical and organisational controls across a broad spectrum of systems and processes. These measures are monitored, reviewed and regularly enhanced to meet our professional responsibilities and the needs of our clients.	Back
[2]	Our Affected Offices are branch offices of, or are otherwise associated with, either Squire Patton Boggs (UK) LLP or Squire Patton Boggs (US) LLP. These are listed in Annex 1 to this Privacy Notice. The relevant entities may operate as joint controllers that will collaborate with one another, as necessary, to comply with our obligations under the DIFC-DPL, including to address requests by data subjects to exercise their rights under the DIFC-DPL, as set out in Section 8 of this Privacy Notice.	Back
[3]	Please direct all general communications or queries relating to this Privacy Notice or the firm's compliance with the DIFC-DPL to our local data privacy contact. With regard to the exercise of data subject rights under the DIFC-DPL, a specific email address is provided in Section 8 for the convenience of individuals wishing to submit a data subject request.	Back
[4]	So far as is possible, we use the Recruitment Platform to collect and process applications of Applicants 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 DIFC-DPL. We use the Recruitment Platform primarily to structure, store and enable the sharing of any personal 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. 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	Back

	our data processing, such as organising interviews and receiving evaluation information.	
[5]	Depending on the purpose and circumstances of the Processing, the Firm will typically rely on one or more of the following lawful bases: • Article 10(b), where the Processing is necessary to take steps at your request before entering into an employment, partnership, consultancy or other engagement contract, or to perform a contract with you; • Article 10(f), where the Processing is necessary for the specific legitimate interests of the Firm or a third party described in section 4, provided those interests are not overridden by your interests or rights; • Article 10(c), where the Processing is necessary to comply with Applicable Law to which the relevant Controller is subject; or • Article 10(a), where you have given specific, freely given consent that meets the requirements of Article 12. Where the Firm Processes Special Categories of Personal Data, it will also identify and rely on an applicable condition under Article 11 of the DIFC-DPL. An Article 11 condition is required in addition to, and does not replace, the relevant Article 10 lawful basis.	Back
[6]	It is our general policy to retain potential Applicant 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: If you submit your own personal data and are an unsuccessful Applicant: • 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. If you apply via a third-party staffing or recruiting company and are an unsuccessful Applicant: • 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	Back

	address and the name of the agency that submitted your name will be retained for 12 months. This is to enable us to meet our contractual obligations with the third-party staffing and recruiting company that referred you to us. 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.	
[7]	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.	Back
[8]	We have put in place appropriate intra-group agreements using the Commissioner-approved Standard Contractual Clauses for controllers or processors, as appropriate, to protect intra-group transfers of personal data from our Affected Offices to Squire Patton Boggs offices in the United States, European Union, United Kingdom, Australia, the Asia-Pacific region, the Middle East and other locations outside the DIFC. You may request a copy of the DIFC Standard Contractual Clauses or other relevant international transfer documentation by contacting our local data privacy contact using the contact details provided in Section 2 of this Privacy Notice.	Back
[9]	We put in place data transfer agreements based on the applicable Commissioner-approved Standard Contractual Clauses or rely on other available data transfer mechanisms (Binding Corporate Rules, approved Certifications or Codes of Conduct) to protect the personal data so transferred. In exceptional cases, we may rely on statutory derogations for international data transfers.	Back
[10]	These rights are not absolute and are subject to various conditions under the DIFC- DPL. In some cases, the exercise of these rights (for example, erasure, objection, restriction or the withholding or withdrawing of consent to processing) may make it impossible for us to achieve the purposes identified in Section 4 of this Privacy Notice in relation to your potential employment or partnership with the Firm.	Back
[11]	The right of access does not apply when we are under legal obligation of professional secrecy or if granting access would infringe on the rights and freedoms of another individual.	Back
[12]	The right to erasure applies in some cases and only to the extent this is not in breach of a legal obligation to which we are subject.	Back

[13]	The right to restriction or objection applies in some cases, and only to the extent this is not in breach of a legal obligation of professional secrecy to which we are subject.	Back
[14]	The right to object may be exercised: • Based on grounds relating to the individual's particular situation, where the processing is based on the legitimate interest of Squire Patton Boggs; • Where personal data is being processed for direct marketing purposes; or • Where any decision based solely on automated processing, including Profiling, produces legal consequences concerning the data subject or other seriously impactful consequences and to require such decision to be reviewed manually.	Back
[15]	Where consent is the basis for processing their personal data, the individual may decline to give their consent or withdraw consent to the processing at any time.	Back
[16]	Squire Patton Boggs will not discriminate against an Applicant because the Applicant has exercised a right under the DIFC-DPL.	Back
[17]	The processing of requests for action by Squire Patton Boggs in regard to the exercise of a data subject's rights under the DIFC-DPL is overseen by an internal team consisting of the DSAR Manager, the Office of General Counsel, the local data privacy contact and other professionals needed to respond to the particular request.	Back

Annex 1: BRANCH OFFICES AND LEGAL ENTITIES

Squire Patton Boggs (MEA) LLP

Dubai International Financial Centre
Burj Daman Office Tower, Level 10
P.O. Box 111713
Dubai
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