

# Recruitment Privacy Notice

## 1. Introduction

Throughout this Recruitment Notice, the Company may be referred to as “the Company”, “we”, “us”, or “our”. “Aon” refers to Aon plc, including its affiliated companies and subsidiaries (also referred to as “we”, “us,” or “our”). Personal information is collected by each member of the Aon group who is responsible for its processing in their capacity as a controller. A full list of our group entities is available [here](#). These entities may provide separate privacy notices when your personal information is first collected by that Aon entity, for example, when you or the business you work for engages us to provide a service.

## 2. Collecting Your Information

2.1 The information we collect depends on the requirements of the vacancy and is done in line with applicable laws and regulations, including labour laws of the country where the job position is based. The list below contains possible personal information that will be processed through the employment process at Aon, though please note that in certain jurisdictions some of the information mentioned below might not be processed.<sup>1</sup> :

- a. contact details, such as your name, home address, telephone number and email address and other such contact information about your nominated referees;
- b. demographic personal details, such as your date of birth, age, gender, place of birth, nationality, country of residence, immigration status, work permit status, social security number, spoken languages.
- c. identity verification details, such as your birth certificate, passport, pay related social insurance number, driving licence, utility bill, bank statement, identity card or other similar identification information;
- d. financial details, such as your salary, bonus, share schemes, credit status, bankruptcy status, pension scheme or other benefit details;
- e. employment, education and training details, such as your previous employment history, employment references and other similar references, educational and professional qualifications, professional licences and certifications, competency assessment and examination outcomes and training and development details, details contained in letters of application and CVs;
- f. background checks information such as criminal convictions, alleged offences or prosecutions pending and any adverse Workplace Relations Commission/Labour Court findings;
- g. health details, such as sickness and fitness details and medical assessments reports;
- h. equality and diversity monitoring details, such as racial and ethnic origin, gender, sexual orientation, age, marital or civil partnership status, religion or other similar beliefs and health details, including details of any physical or mental incapacity and disability information<sup>2</sup>;
- i. Photograph and/or images/footage captured/recorded on CCTV or other video systems when you visit our offices;

2.2 You are required to provide any personal information that we reasonably require to assess your application for employment and meet our legal and regulatory obligations. Where you refuse to provide information that we reasonably require in order to fulfil these obligations we may be unable to consider your application.

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<sup>1</sup> The descriptions of the information comprised in each category are examples and are not exhaustive.

<sup>2</sup> The data in sections 2.1(g) and 2.1(h) above may only be collected where required by local law or where this is necessary to secure equal opportunity and treatment for all candidates and employees.

- 2.3 Where you provide personal information to the Company about third party individuals (e.g. information about your referees), where appropriate, you should provide these individuals with a copy of this Notice beforehand or ensure they are otherwise made aware of how their information will be used by the Company.
- 2.4 In addition to sourcing personal information from you directly, we may also collect personal information about you from other third parties, such as your nominated referees, previous employers, educational and professional establishments, credit reference agencies, vetting agencies, criminal record agencies, medical professionals and other professional advisory service providers, publicly available registers (as allowed by applicable laws and regulations) as well as publicly available professional profiles on websites and/or social media (e.g., LinkedIn). This information may be sourced prior to and during the course of your application. Further information concerning such third parties can be found below in section five (5) of this Notice.

### 3. Processing Your Information

We will use the information we collect about you in your application to:

- a. process applications for employment and inform recruitment decisions taken about appointments and new hires;
- b. monitor racial or ethnic origin, gender diversity and physical or mental incapacity;
- c. fulfil our legal and regulatory obligations;
- d. monitor compliance with our legal and regulatory obligations and internal policies, standards, and procedures;
- e. manage the physical and logical security of our office premises and equipment, networks, IT systems, applications and devices (including access to those IT systems, applicable and devices), confidential information and intellectual property;
- f. facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;
- g. investigate, exercise or defend legal claims or other claims of a similar nature; and
- h. exercise or enforce our rights.

### 4. Legal Grounds for Processing

The Company relies on the following legal grounds to collect and use your information:

- a. Prospective performance of the employment contract : We will collect and use your personal information where necessary to assess your application for employment and to determine whether we wish to offer you employment particularly for the processing activities set out in section 3(a) of this Notice..
- b. Discharging legal and regulatory obligations : The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations in connection with your prospective employment particularly for the processing activities set out in sections 3(b) and 3(c) of this Notice. For example, this may include obligations concerning equality and diversity monitoring, pay related social insurance and tax remittance, health and safety and immigration and work permit checks.

- c. Processing for occupational health purposes. : The collection and use of some of your sensitive personal information, such as information about your physical and mental health is necessary for occupational health purposes particularly for the processing activities set out in sections 3(a) and 3(b) of this Notice. For example, this may include medical assessments and diagnosis to evaluate your potential work capacity and the provision of health or social care treatment.
- d. Processing to establish, exercise and defend legal claims. : The collection and use of some of your personal information, is necessary to enable us to establish, exercise or defend legal claims or other claims of a similar nature particularly for the processing activities set out in sections 3(g) and 3(h) of this Notice.
- e. Pursuing legitimate interests : The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, e.g. to operate our business, particularly the processing activities set out in sections 3(a), 3(d), 3(e), 3(f), 3(g) and 3(h) of this Notice. Where we rely on this legal basis to collect and use your personal information we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under applicable data privacy law.
- f. Consent  
 In certain limited situations where allowed by local laws we rely on your consent to collect and use your personal data, in particular sensitive or special category personal information, e.g. criminal conviction data, health data or data regarding your racial or ethnic origin and other information that you may provide on a voluntary basis particularly for the processing activities set out in section 3(b) of this Notice. We rely on consent also for the purpose of potential future recruitment processes.  
  
 Where we rely on your consent to collect and use such information, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided.

## 5. Recipients of Your Information

We generally share personal information about our prospective employees with the following recipients:

- a. recruitment agencies, where necessary to administer and manage the recruitment process;
- b. employees, where necessary to operate our business;
- c. third party suppliers, where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions;
- d. successors of the business, where the Company is sold to, acquired by or merged with another organisation, in whole or in part.

- e. medical professionals and occupational health advisers, where we require you to undergo a medical assessment or require professional advice about your physical or mental health. These advisers may in turn also share personal information with us about medical assessment outcomes and your health status;
- f. public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations;
- g. legal advisers, insurers and claims investigators, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature; and
- h. law enforcement bodies, where necessary to facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders.

## **6. Overseas Transfers of Your Information**

- 6.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries to be processed for the purposes outlined in this Notice. In particular, we may make such transfers to assess and manage your application for employment, operate our business, improve the efficiency of our business operations and comply with our legal and regulatory obligations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.
- 6.2 Where we collect personal information about you in the European Economic Area (the “EEA”) or the United Kingdom (the “UK”) we may transfer the information to countries outside EEA or UK for the processing purposes outlined in this Notice. This may include transfers to countries that the European Commission (the “EC”) and the UK data protection regulator consider to provide adequate data privacy safeguards such as Canada and to some countries that are not subject to an adequacy decision. Aon has an intra-group data transfer agreement in place which regulates cross-border transfers of your personal information within the Aon Group and which incorporates EU and UK standard contractual clauses approved by the EC. Where we transfer personal information to third parties located in countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as the aforementioned data transfer agreements approved by the EC or UK data protection regulator, as appropriate. Where necessary, we may implement additional technical, organizational or contractual measures to ensure an adequate level of protection for your personal information. Where required, further information concerning these safeguards can be obtained from Human Resources.

## **7. Retention of Your Information**

- 7.1 The Company retains appropriate records of your personal information to operate its business and comply with its legal and regulatory obligations. Where your application for employment is unsuccessful we will retain appropriate records of your application for a period of 15 months unless legal or regulatory obligations imposed on us require specific information to be retained for longer or where the information is being retained for the purposes described below in section 7.2. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.
- 7.2 In addition to the general retention period set out above in section 7.1, we may also retain your personal information for a reasonable period to enable us to match your details with other suitable job opportunities that may arise within Aon from time to time. If you do not wish your information to be retained for this purpose you should inform Human Resources.

## **8. Accuracy of Your Information**

We rely on the availability of accurate personal information to assess your application for employment and to match you with future job opportunities that may arise. You should therefore ensure the information you submit to support your application is accurate and, where appropriate, kept up to date. You should promptly notify us of any changes to your personal information.

## **9. Information Security**

We have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy law.

## **10. Your Information Rights**

10.1 You have the following rights under applicable data privacy law in respect of any personal information we collect and use about you:

- a. The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you.
- b. The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
- c. The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
- d. The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
- e. The right to request the restriction of your personal information from further processing, e.g. where the accuracy of the information is disputed and you request that the information not be used until its accuracy is confirmed.
- f. The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
- G The right to withdraw consent at any time, whenever we have asked for your consent for processing your personal information without affecting the lawfulness of processing based on consent before its withdrawal.
- h.. The right to complain to the relevant data protection regulator about our processing of your personal information.

10.2 It is important to note, however, that some of the rights described above in section 10.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy law we will write to you to explain the reason for refusal (e.g., for compliance with a legal obligation, for the establishment, exercise or defence of legal claims or legal exemptions). Where required, further information concerning these rights and their application can be obtained from the Data Privacy Office.

## **11. Cookies**

Our websites may utilise cookies and other tracking technologies, including to ensure that basic functionality of our site is maintained, which we call strictly necessary cookies. We may also want to set either first- or third-party optional cookies to improve the experience on our websites. To view the categories of cookies on each of our websites, please utilise our OneTrust Cookie Preference Center, which may be found as a footer of our websites and/or when you first visit our websites. We ensure that our use of cookies is in line with local legal and regulatory requirements, and as such have ensured that the behaviour and appearance of our Cookie Preference Center is based on the geolocation of your IP address.

## **12. Complaints**

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting Human Resources in the first instance. However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the data protection regulator:

Data Protection Commissioner  
Office of the Data Protection Commissioner

21 Fitzwilliam Square South,  
Dublin 2, D02 RD28,  
Ireland  
or online at <https://www.dataprotection.ie/en/contact/how-contact-us>

**13. Changes to this Notice**

This Notice is not contractual and we reserve the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use your personal information. Any updates or changes to this Notice will be published on the career website. You should periodically review this Notice to ensure you understand how we collect and use your personal information.

This privacy notice was updated in September 2023.

**14. Contact Information**

If you have any questions about the content of this Notice or the rights conferred to you under applicable data privacy law you should contact the Data Privacy Office at the following address:

Data Protection Officer,  
Metropolitan Building  
James Joyce Street  
Dublin 1  
Ireland  
Email: [privacy@aon.ie](mailto:privacy@aon.ie)

**15. Employee Privacy Notice**

Where you are offered employment with the Company a separate employee privacy notice will be issued to you to explain how we make use of the personal information collected about you in connection with your employment.