
Introduction

This Global Recruitment Privacy Notice explains how we collect, use and protect your Personal Data during the Recruitment process.

Your privacy is important to us, and we are committed to protecting and safeguarding your rights in relation to your Personal Data.

For the purpose of applicable Data Protection/ Privacy legislation, the company which is the data controller and organization responsible for your personal data is **Invesco Ltd. ("Invesco", "we", or "us")** and its relevant subsidiaries and affiliates. For further details of the entity in your geographic location, please see the **Annex 2 – Contacts section**.

This Global Recruitment Privacy Notice is non-contractual, and we may amend it occasionally. Please visit this page regularly to view any changes to this Global Recruitment Privacy Notice.

This Global Recruitment Privacy Notice applies in the relevant countries where we operate. Invesco respects the local data protection laws and regulations and, where relevant, key additional country-specific obligations will be included in **Annex 1 – Country-Specifics**.

How do we collect your personal data?

We collect your personal data in three primary ways:

1. Your personal data collected directly from you

There are numerous ways that you can share your information with us. These may include:

- When you make a job application to Invesco via our website or other recruitment portal;
- When you register to receive more information from us at a job fair or other Invesco careers event; or
- Information you provide to Invesco Staff in communications during the Recruitment process.

2. Your personal data we receive from other sources

We also receive personal data about you from other sources, such as:

- LinkedIn and other job sites or from third parties such as recruitment agencies, consultants, and members of Invesco Staff who refer you to us;
- Our internal recruitment team who receive your information;
- Third-party service providers who undertake background checks about you on our behalf;
- Your referees;
- Social media or similar sites on which you 'follow' us;
- Publicly accessible sources, including publicly available online profiles and databases (e.g. to establish and verify your identity, to find out your contact details or to liaise with you in relation to the Recruitment process).

3. Automatically collected personal data

We may collect your personal data automatically such as:

- Communications that you send to Invesco which pass through Invesco Systems, including emails and social media messages;
- When you visit our website, your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you use our 'contact us' function via the website;
- Via cookies when you visit our website, in line with cookie settings in your browser/consent management platform. We may use data from your use of our websites to enhance other aspects of our communications with you.
- When you visit Invesco premises in person, we may have CCTV footage from applicable locations.

Information we collect

We collect information about you to enable the Recruitment process to run smoothly. Depending on the relevant circumstances, your location and subject to local Law requirements, we may collect information about you as shown below.

Please note that the personal data in *italics* is only collected in limited circumstances where collection of this information is applicable/appropriate:

Categories of personal data	Types of personal data processed
Your personal details	Name; age/date of birth; sex/gender; your signature (including in electronic form); Immigration status (whether you need a work permit); Marital status; Nationality/citizenship/ place of birth; bank account information; pension account information; investment details; <i>health and disability-related information; your personality type; drug test result; vaccination status (in locations where required by a local Law); military & veteran status</i>
Your private contact details	Home address; personal email address; personal telephone number; Social media handle; Profile data (Username)
Identification data	A copy of your driving license and/or passport/identity card; my number (Japan); social security number/national insurance number (or equivalent in your country); any other tax-related information; biometric information; information we obtain from background verification checks; <i>information relating to driving citations and criminal convictions and offences</i>
Your education and employment history	Exam results; achieved degrees/levels of education; employment history and locations of previous employment; details about your current or former role(s) including remuneration, pension and benefits arrangements;
Automatically collected personal data	CCTV footage (in locations where applicable); communications that you send to Invesco which pass through Invesco Systems, including emails and social media messages; Meta data (i.e. IP address; browsing activity;
Other	<i>Extra information that you or third parties such as your referees choose to provide to us (including sensitive personal data, political affiliation, and activities)</i>

How we use your information

This section provides a non-exhaustive list of purposes that we may use your personal data for and the legal basis on which we rely to ensure that we process your personal data lawfully:

Purposes of the processing

Ensuring the smooth running of the Recruitment Services and enabling us to decide about your suitability for the role:

- Enabling recruiters to contact you about the role; collecting your data from you and other sources;
- Storing and transferring your details (and updating them when necessary) on and between our internal recruitment databases and applicant tracking systems, and keeping a record of when you attend an interview or other assessment;
- Assessing your qualifications for a particular role, including decisions about appointment; enabling our hiring managers to decide whether to make you a job offer;
- Verifying information we have received, using third party resources where permitted under local Law (such as psychometric evaluations or skills tests) or through information requests (such as references, background verification checks, qualifications and criminal convictions checks, to the extent that this is appropriate);
- Informing you of the result of your application, determining the terms on which you will work for us and making arrangements in order to offer you a job;
- If you are successful in being appointed to a role, transferring your personal data onto our internal HR systems

Legal basis for the processing

- Processing is necessary to pursue our **legitimate interest** in hiring appropriate Staff, where this interest does not override your interests or fundamental rights or freedoms;
- Processing is necessary for the **performance of our intended contract** with you (where relevant);
- Processing relates to sensitive personal data which is manifestly made public by you (e.g., on your publicly accessible social media profile);
- Processing is necessary to comply with our **legal obligations** (e.g., where permitted under local Law we may be required to keep a record of your application to comply with local immigration laws);
- Processing sensitive personal data is necessary for the purposes of carrying out our obligations in the field of employment law;

Retaining your personal data for future roles:

- If you are unsuccessful in your application for a role with Invesco, we will ask for your permission to retain your personal data and your application data for a period of up to 3 years following the end of the recruitment process to:
 - Build our talent pool — to contact you if a suitable role at Invesco becomes available that we think you may be interested in applying for;
 - Compliance with local regulation or industries where there may be requirements to retain candidate data for a specific period to meet our obligations on certain equal opportunity or anti-discrimination regulations.
 - Historical reference — to provide insight on previous applications.
 - Analytics data to identify trends, improve our hiring process and make better informed decisions.
- Processing is necessary to pursue our legitimate interest in hiring appropriate Staff, where this interest does not override your interests or fundamental rights or freedoms
- Processing is necessary to comply with our legal obligations (e.g., where permitted under local Law we may be required to keep a record of your application to comply with local immigration laws);
- Processing is based on your consent (e.g. you consent on the completion of your job application)

Keeping Invesco secure (where and subject to the extent permitted by applicable Law):

- Intercepting and monitoring electronic communications that you send to Invesco which pass through Invesco Systems, including emails and social media messages, to ensure network and information security;
- Running CCTV at our premises to ensure the safety and security of you, our Staff and property (in locations where applicable)
- Processing is necessary to pursue our legitimate interest in protecting our Staff and property, where this interest does not override your interests or fundamental rights or freedoms

Making appropriate adjustments for you:

- If you suffer from any health conditions or disabilities, we may record details of them so that we can make reasonable adjustments for interviews and other Recruitment procedures if required
- Processing is necessary to comply with our legal obligations.
- Processing sensitive personal data is necessary for the purposes of carrying out our obligations in the field of employment law;
- Processing sensitive personal data is necessary to assess your working capacity

Sharing of your personal data (disclosure and transfer)**Who do we share your personal data with?**

Depending on the Recruitment Services you access, we may share your personal information with different parties. These may include the following recipients:

- Any of our group companies (this may include those in our overseas offices), for example, for internal administrative, regulatory compliance and other legitimate business purposes — *you can see the list of Invesco companies in the **Annex 2 — Contacts section**.*
- Your family and personal representatives, for example, if you are involved in an accident whilst at an interview with Invesco;
- Individuals and organizations who hold information related to your reference or application to work with us, such as your current or past employers, educators and examining bodies, immigration agencies, employment and recruitment agencies and criminal convictions checks providers;
- Where appropriate, medical professionals such as your doctor / GP, or an occupational health specialist;
- Pension scheme administrators, external consultants, business associates and professional advisers such as lawyers, auditors, accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Third-party outsourced IT and document storage providers where we have appropriate protections in place; and
- Third parties holding information related to your financial records such as financial organizations, credit reference agencies and debt collection and tracing agencies.
- We may also share your personal data with a potential buyer in connection with any proposed purchase, merger, or acquisition of any part of our business.

When we use third-party processors, we ensure they process your personal data in accordance with our instructions and that they put appropriate technical and organizational security measures in place to adequately protect your personal data.

We also may disclose your personal data to courts, the police, or other law enforcement agencies where we are legally obliged to do so, or when in our reasonable opinion such disclosure is necessary to comply with applicable laws and legal processes, support an investigation, or to protect our rights and interests in relation to any suspected misuse by you of our services.

Invesco does not sell personal data of individuals who are part of the Recruitment process.

How do we transfer your personal data internationally?

Invesco is a global employer and for us to continue operating in this way and to carry out the processing described in this Global Recruitment Privacy Notice, your personal data may be transferred to recipients which may be located outside of the area of your residence or jurisdiction. While the information is in the other jurisdiction, it may be accessed by courts, law enforcement, and national security authorities.

Where the level of protection of personal data in those countries has not been deemed adequate by relevant bodies or applicable Laws of your jurisdiction, we will enter into an appropriate data transfer agreement with the data recipient incorporating the standard contractual clauses and/or any other applicable model clauses in other jurisdictions. Some of the third parties engaged by us may rely on other transfer mechanisms (e.g., binding corporate rules) to provide appropriate safeguards to ensure that your personal data will remain adequately protected in accordance with applicable data protection laws.

When we need to transfer your data, we will ensure that your personal data is transferred, processed, and maintained to the standards required by Law.

We endeavour to prevent unauthorized disclosures of your personal data by other people, but we are not responsible for any unauthorized disclosures or other breaches of security or for the actions of others if the personal data was passed to them with your authority or with the authority of anybody other than us or our affiliates.

How do we protect your personal data?

We maintain strict security standards and procedures to prevent unauthorized access to your personal data by anyone, including our Staff. We use a variety of leading administrative, physical, and technical security measures to help safeguard your personal information. You can learn more about how Invesco keeps your data safe by reading our article Keeping safe online with Invesco. The Staff of Invesco follow strict privacy standards and whenever we hire third parties to provide support services, we require them to observe the same standards and to allow us to audit them for compliance.

How long do we hold your personal data for?

Subject to your rights we will ordinarily process your data from when you first contact us and retain it for a period until after the Recruitment process ends for the period permitted under local law.

The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. For example, we may be required to retain it for a certain period to comply with local law requirements in relation to immigration checks.

In determining the appropriate retention period for different types of Personal Data, we always consider the amount, nature, and sensitivity of the Personal Data in question, the potential risk of harm from unauthorized use or disclosure of that Personal Data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above).

If your application for employment is unsuccessful, we will ask for your consent to hold your data on file for 3 years after the end of the recruitment process.

Once we have determined that we no longer need to hold your Personal Data, we will delete it from Invesco Systems or destroy any paper files and archives.

Your rights

Your rights in relations to the personal data we hold, and process is dependent on your jurisdiction's applicable laws and subject to certain conditions. These rights may include:

- Right of access — you have the right to request the personal data we hold about you;
- Right to rectification of your personal data;
- Right to erasure of your personal data;
- Right to restrict processing of your personal data;
- Right to withdraw consent;
- Right to object to the processing of your personal data;
- Right of data portability;
- Right not to be subject to automated decision-making; and
- Right to lodge a complaint with your local supervisory authority, including in the country of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the applicable Law

Additional rights specific to:

Israel:

- As next of kin or a legal representative of a deceased natural person you may exercise the Right to have the deceased natural person's personal data removed from a direct mailing database

Singapore, China:

- As next of kin or a legal representative of a deceased natural person you may exercise all the above rights, except where the deceased has arranged otherwise before their death

India:

- Right to nominate — you have the right to nominate other individuals to act on your behalf in the event of death or incapacity

South Korea:

- Right to self-determination — you have the right to decide when, with whom, and to what extent is your personal data shared with and used by;
- Right to make a document return request — if you were unsuccessful in your Recruitment process, you can make a request within 14 days from the date when we've confirmed your identity to have your documents used during the Recruitment process to be returned to you. If you don't make such request within the return claim period, the documents will be destroyed as per our internal retention policy.
- Right to be informed about the use of a fully automated system during the Recruitment process; and
- Right to request human intervention from the person in charge of Recruitment to re-examine the validity of the employment decision and explain the review result if a fully automated system is used during the Recruitment process

Please note that the above rights are limited and, where legally permitted to do so, we may rely on these limitations when responding to your requests.

We may need to collect additional information from you when you exercise your rights. We will use the information only for verification purposes and will delete it as soon as practicable after complying with the request.

For requests related to particularly sensitive personal information, we may require additional proof of identification. If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf. We will process your request within the time provided by applicable Law.

Please note that we may keep a record of your communications to help us resolve any issues you raise.

You can exercise these rights by contacting us using the contact details provided in the **Annex 2 — Contacts** section. We will respond to your request consistent with applicable Law. We do not discriminate against you for exercising any of these rights.

You also have the right to lodge a complaint with a supervisory authority about our use of your personal data or to challenge our compliance with our obligations in the applicable jurisdiction of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the Law.

Revisions to this online privacy statement

This Global Recruitment Privacy Notice was last updated on 29th August 2025. We reserve the right to revise this Global Recruitment Privacy Notice at any time by posting a revised version online.

Annex 1 — Country-Specifics variations

Belgium	Where necessary, we will comply with any additional legal obligations to consult with our Staff under Collective Bargaining Agreements n°68 of 16 June 1998 and n°81 of 26 April 2002 and will only process Personal Data in a way that is consistent with the outcome of such consultation.
Czech Republic	We will not copy your passport or identity card without your consent.
France	French law allows data subjects to give instructions regarding the retention, erasure and disclosure of their Personal Data after their death. In the absence of such instructions, their heirs will have the possibility of exercising certain rights over such Personal Data.
Germany	A Data Protection Officer (Datenschutzbeauftragter/DPO) has been appointed in accordance with German national legislation (Bundesdatenschutzgesetz). His contact details are: Leif Baumann Direct line: +49 (0)69 298 07 374 Facsimile: +49 (0)69 298 07 550 Email: Leif_Baumann@fra.invesco.com Address: An der Welle 5 60322 Frankfurt Germany
Italy	In accordance with Law 167 of 20 November 2017, Invesco is entitled to reuse of data (including Sensitive Personal Data, but not genetic data), provided that appropriate data minimisation and anonymisation measures are used.
Jersey	If you are resident in Jersey, you have the right to lodge a complaint with the Office of the Information Commissioner in Jersey by visiting www.dataci.je , if you consider that the processing of your Personal Data infringes the GDPR or the Data Protection (Jersey) Law 2018. If you are resident in Jersey, the time for complying with any of the data subject rights set out in this EMEA Recruitment Privacy Notice is 4 weeks rather than one month.
Spain	In accordance with local law, we have the right to refuse to act on your DSAR if (i) such right has already been exercised within the previous 12 months, except when there is a legitimate interest; or (ii) a Spanish or European law does not allow us to reveal the processing of such data. Your right to rectification and deletion can be denied if: (i) it is necessary to keep the relevant Personal Data for legal or contractual reasons; or (ii) a Spanish or European law does not allow us to reveal the processing of such data.
Sweden	According to the Swedish Data Protection Regulation (2018:219), we will only process details about criminal convictions if the processing is necessary to: 1. establish, enforce or defend legal claims; or 2. fulfil a legal or regulatory obligation.
Switzerland	The Swiss Federal Data Protection Act ("SFDPA") applies to our processing of Personal Data in connection with our management of your relationship with us in Switzerland. References to the GDPR are, for the purposes of this EMEA Recruitment Privacy Notice, references to the SFDPA. To comply with Swiss data protection and employment laws, we refrain from using social media sites (except LinkedIn and other business-related sites) as a source of Personal Data processed in connection with our management of your relationship with us in Switzerland. Exceptions apply where this is required to prevent misuse of Invesco Systems, investigate infringements of applicable policies or necessary to protect the confidentiality, integrity and availability of Personal Data and for other security purposes.

NOTE: THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED

Annex 2 — Contacts

Location in which you are a member of Invesco staff	The Invesco entity responsible for processing your personal data will be your employer or the counterparty associated with the relevant arrangement with you (e.g. if you are a contractor)	How you can get in touch with us: - to exercise your rights in relation to your personal data; - if you suspect any misuse or loss of or unauthorized access to your personal information; - with any questions, comments or concerns about this Global Recruitment Privacy Notice - Recruitment process related questions should be sent to the relevant HR contact listed below
Australia	Invesco Australia Limited	APAC Recruitment Team: apac.careers@invesco.com
Austria	Invesco Management S.A. Niederlassung Österreich	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Belgium	Invesco Management S.A. (Luxembourg) Belgian Branch	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Canada	Invesco Canada Ltd.	North America Recruitment Team: natalentacquisition@invesco.com Global Privacy Office: na.privacy@invesco.com
China	Invesco Investment Consulting (Beijing) Limited Invesco Investment Management (Shanghai) Limited Invesco Ruihe (Shanghai) Private Equity Investment Management Company Limited	APAC Recruitment Team: apac.careers@invesco.com Global Privacy Office: apac.privacy@invesco.com
Czech Republic	Invesco Management S.A. odštěpný závod	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
France	Invesco Management S.A., Succursale en France	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Germany	Invesco Management S.A. Zweigniederlassung Deutschland	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Hong Kong SAR	Invesco Hong Kong Limited	APAC Recruitment Team: apac.careers@invesco.com Global Privacy Office: apac.privacy@invesco.com
India	Invesco (India) Private Limited Invesco Asset Management (India) Private Limited	India Recruitment Team: careers.ih@invesco.com Global Privacy Office: apac.privacy@invesco.com

Ireland	Invesco Investment Management Limited	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Israel	Invesco Asset Management Limited	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Italy	Invesco Management S.A., Succursale Italia	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Japan	Invesco Asset Management (Japan) Limited Invesco Global Real Estate Asia Pacific, Inc. Japan Branch	APAC Recruitment Team: apac.careers@invesco.com Global Privacy Office: apac.privacy@invesco.com
Jersey	Invesco International Limited	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Luxembourg	Invesco Real Estate Management S.a.r.l. Invesco Management S.A.	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Netherlands	Invesco Management S.A., Dutch Branch	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Poland	Invesco Management S.A. Oddział w Polsce	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Singapore	Invesco Asset Management Singapore Ltd.	APAC Recruitment Team: apac.careers@invesco.com Global Privacy Office: apac.privacy@invesco.com
South Korea	Invesco Real Estate Korea	APAC Recruitment Team: apac.careers@invesco.com Global Privacy Office: apac.privacy@invesco.com
Spain	Invesco Management S.A., Sucursal en España	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Sweden	Invesco Management S.A. (Luxembourg) Swedish Filial	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com

Switzerland	Invesco Asset Management (Schweiz) AG	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
Taiwan	Invesco Taiwan Limited	APAC Recruitment Team: apac.careers@invesco.com Global Privacy Office: apac.privacy@invesco.com
United Arab Emirates — Dubai	Invesco Asset Management Limited (Branch Office)	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
United Kingdom	Invesco UK Limited	EMEA Recruitment Team: EMEA-TalentAcquisition@invesco.com Global Privacy Office: emea.privacy@invesco.com
United States of America	Invesco Group Services, Inc.	North America Recruitment Team: natalentacquisition@invesco.com Global Privacy Office: na.privacy@invesco.com California toll-free number: 1-800-959-4246