

Job Applicant Privacy Policy

Effective January 1, 2023

INTRODUCTION

This Privacy Policy describes how and why we process any Personal Data we collect about you when you visit our careers site, apply for a role with us, or otherwise interact with us in relation to recruitment activities. If you interact with us in other contexts, such as when you are a consumer, our processing of data collected in that situation is governed by a different policy.

This Policy applies to job applicants interacting with the ASR Group International, Inc. family of companies. The controller in each instance may be different, depending on the job you are applying for:

- In the UK, the controller is Tate & Lyle Sugars Limited
- For Spain and Portugal, the controller is Sidul Açúcares, Unipessoal, Lda
- In the United States, the controller is Florida Crystals Corporation

By applying for a job with us, you accept the practices described in this Privacy Policy (as amended from time to time). If you do not agree with these practices, please do not continue with your job application.

COLLECTION

Personal Data is generally any information that could be used to identify you in some way. The Personal Data that we collect from or about you may include but is not limited to the following:

- Your name;
- Your address;
- Your e-mail address;
- Your phone number;
- Your financial information (including your bank details);
- Information about your work experience, skills and attributes, education information, and any other related information contained in your CV;
- Demographic information;
- Records made of any interviews we have with you;
- Information about you derived as part of the recruitment process;

- Information about your visit to our careers website, including information about how and when you came to visit our websites, how you interacted with the websites (products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information such as scrolling, clicks, and mouse-overs), and where you went next (including full URLs and methods used to browse away from the site); and
- Technical information about the way that you use the web, including the internet protocol (IP) address or other device identifier, your login information if you register on our website or via our app, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information.

FAILURE TO PROVIDE PERSONAL INFORMATION

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualification or work history) or if you provide inaccurate, incomplete or misleading information, we may not be able to process your application.

SOURCES

We collect this information from you, your references, your former employers, and service providers who may assist us in our recruiting activities.

USE & RETENTION

We use your Personal Data for the following purposes:

- Applicant Evaluation. We use your Personal Data to manage the hiring process, including evaluating and communicating with individuals who apply for positions we advertise, because ensuring that we recruit the right people to join our team is in our legitimate interests.
- Administrative Operations. We use your Personal Data for administrative purposes—such as ensuring that our recruitment processes and careers site works properly, information is presented in the most effective/relevant manner for you, and the recruitment experience is tailored based to the way that you engage with us—because doing so is in our legitimate interest.
- Security and Legal/Compliance. We use your Personal Data for security and legal/compliance purposes. This may involve us using your data to fulfil a legal obligation (such as responding to a legitimate request from law enforcement). In other situations, such as the detection of fraud or ensuring the security of the site, we will rely on our legitimate interests to use your Personal Data.

- We may also processing special category or “sensitive” data for purposes like performing credit checks, where required by law and/or with your consent.

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and, unless otherwise required by law, in accordance with our company records retention policy.

DISCLOSURES

We do not sell Personal Data.

We may disclose Personal Data to certain companies (such as your references, your former employers, or the businesses we partner with to help us assess applicant suitability to a certain role) that assist us in maintaining and managing our recruitment activities. Such disclosures are consistent with our legitimate business interests. These vendors are only given access to the information they need in order to perform the specific tasks they have been hired to do and are prohibited from using your Personal Data for any other purpose.

In the event of a merger or acquisition of all or part of our company or assets, the acquirer may have access to the information previously maintained by us, which could include your Personal Data. Similarly, any information in our possession, including your Personal Data, may be transferred to another party entity as part of a corporate reorganisation, insolvency proceeding, or other similar event.

TRANSFERS

The data that we collect from you may be transferred to, and stored at, a destination outside of your home jurisdiction. It may also be processed by staff operating outside your home jurisdiction or for one of the third parties we work with. Any restricted transfers are conducted pursuant to contracts that comply with relevant data protection laws and regulations. We only transfer your Personal Data to countries that guarantee adequate protection, based on appropriate safeguards or another statutory exemption provided by local applicable law.

CHILDREN'S PRIVACY

We do not knowingly solicit or collect personal or other information from children under the age of 13 through our website. If we learn at any time that we have inadvertently collected Personal Data from such a child, we will promptly delete the information from our records.

WEB BEACONS AND COOKIES

We use web beacons or other similar technology (“Beacons”) on our careers site and in some email messages we send you. Beacons are small strings of code that provide a method of delivering a graphic image on a web page or in an email message for the purpose of transferring data back to us. The information collected via Beacons may include information about how a user responds to an email campaign (for example, the time the email is opened, where does the user link to from the email, etc.). We use Beacon information for a variety of purposes, including but not limited to, website traffic reporting, unique visitor counts, advertising and email auditing and reporting, and personalisation.

We may also use “cookie” technology on our careers site. A “cookie” is a non-executable element of data that a website stores on your browser or your computer's hard drive. These cookies, among other things, help us to improve the site and provide you with a good user experience. We use three types of cookies: strictly necessary cookies, analytical/performance cookies, and targeting cookies. You can learn more about each type below.

Strictly necessary cookies. These are cookies that are required for the operation of our website, including the careers site. They include, for example, cookies that enable you to log into secure areas of the website:

JQuery Cookies: a plugin for reading, writing and deleting cookies.

Datepicker Cookies: allows users to sort events by date.

Big Pipe Module Cookies: allows us to flush the initial page first, and then stream the replacements for the placeholders. This results in hugely improved front-end/perceived performance.

Comment Module Cookies: When enabled, the Drupal comment module creates a discussion board for each Drupal node. Users can post comments to discuss a forum topic, weblog post, story, collaborative book page, etc.

Cookies for testing: uploads a test to a private node and checks access for development purposes.

Hal Module: When enabled, the HAL module serializes entities using HAL (Hypertext Application Language).

History Module: verifies that the history endpoints work.

Zend: provides methods for parsing HTTP response strings, collecting cookies, and easily accessing their properties. It also allows checking if a cookie matches against a specific scenario, IE a request URL, expiration time, secure connection, etc.

Symfony: facilitates long-term maintenance and scalability by complying with standard development rules.

Squizlabs: a client-side JavaScript application that checks a HTML document or source code, and detects violations of a defined coding standard.

Phantom JS: used for automating web page interaction.

Guzzle: a PHP HTTP client that makes it easy to send HTTP requests and trivial to integrate with web services.

Analytical/performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily.

Google Analytics: allows anonymous recognition, counts number of visitors and sees visitor movement around the site to help improve how the website works. To disable Google Analytics in your browser click [here](#).

Hotjar: anonymously tracks movement and user behavior on our site. To disable Hotjar in your browser, click [here](#).

Optimizely: allows us to do A/B testing of assets and gather data anonymously on how certain assets performed. To opt out of Optimizely A/B testing, click [here](#).

ShareThis: allows users to share pages from the site to their social channels or email while anonymously gathering data on which social channels are used most frequently. To disable ShareThis data tracking, you can opt out [here](#).

Skyglue: a Google Analytics extension that allows anonymous recognition and tracks how users are interacting with the site. To disable Skyglue in your browser, you can opt out [here](#).

Functionality cookies. These are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences.

Targeting cookies. These cookies record your visit to the website, the pages you have visited and the links you have followed. We will use this information to make the website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

DoubleClick: this a product from Google that allows the personalization of ads based on pages a consumer visits. To disable DoubleClick in your browser, you can opt out [here](#).

AGKN: enables real time targeting and aggregates anonymous ads based on the user's preferences. To disable AGKN in your browser, you can opt out [here](#).

If you continue to use the website you agree to our use of cookies. If you do not wish to have cookies on your computer, then you should disable cookies on your browser settings and delete cookies already

stored. However, if you use your browser settings to block all cookies (including strictly necessary cookies), certain features of the website may not function properly, and your experience of the website may be less enjoyable. Unless you have adjusted your browser settings so that it will refuse cookies, cookies will be issued as soon as you visit the website.

SECURITY OF INFORMATION

We take seriously the safety of your Personal Data. We use security measures designed to prevent the loss, misuse, unauthorized access, and alteration of your personal information under our control. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot warrant or guarantee the security of your data transmitted to our website; any transmission is at your own risk.

YOUR RIGHTS

Depending on your country/state of residence, you may have rights relating to your Personal Data that we process. For example, some applicants have a qualified right to request that we: (a) provide them access to their Personal Data; (b) correct or delete that data; (c) restrict the processing of their Personal Data; (d) object to the processing of Personal Data; and (e) limit the transfer of their data to others. And some individuals also have a right to file a complaint with relevant authorities.

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes, please timely inform us at the contact information below of the change.

We will not discriminate against you for exercising those rights.

If you wish to exercise these rights, simply contact us at the address stated below. We will need to verify your identity before processing your request and will endeavour to respond within the time frame required by law. If your request for access is clearly unfounded or excessive, FCC may charge a reasonable fee for honoring the request or may refuse to comply with the request.

LINKS TO OTHER SITES

We do our best to make sure that every link on our website sends you to a safe place on the Internet. However, we cannot and do not guarantee the content or privacy practices of every website for which our website provides a link. We do not accept any responsibility or liability for these policies, please check these policies before you submit Personal Data to these websites.

CHANGES TO THE PRIVACY POLICY

From time to time, we may make changes to our Privacy Policy. If we do make changes, the changes will be posted on this page, and we will indicate at the top of this Privacy Policy when the changes went into effect. We encourage you to come back to this website and review this Privacy Policy frequently so that you are constantly aware of our most current privacy practices.

In the event we want to materially change how we use Personal Data which you have previously provided to us, we will notify you by email or by way of a notice on the website and may give you a choice to consent to or opt out from the desired change. Your continued use of this website after any such notification, or your explicit consent to any changes for which we require your prior approval, will signify your agreement with these changes.

CONTACT US

If you have any questions or concerns about this Privacy Policy or our handling of your Personal Data, please contact us at:

T&L Sugars Limited

Attention: Legal Department
Thames Refinery
Factory Road
Silvertown
London, E16 2EW, UK
Phone: +44 (0) 207 476 4455
Fax: +44 (0) 207 540 1848
Email: privacy@asr-group.com

Sidul Açúcares, Unipessoal, Lda

Attention: Legal Department
Quinta do Ferral
Estrada Nacional Nº 10 - Km 10.6
2690-364 Stª Iria De Azóia
Portugal
Phone: +44207257 9643
Email: privacy@asr-group.com

Florida Crystals Corporation

Attention: Legal Department
One North Clematis Street, Suite 200
West Palm Beach, FL 33401
Phone: 561-366-5100
Fax: 561-366-5180
Email: privacy@floridacrystals.com