

CBRE Global Recruitment and Employee Onboarding Privacy Notice

Last Updated: 25 March 2022

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This CBRE Global Recruitment and Employee Onboarding Privacy Notice (“**Notice**”) is issued by CBRE, Inc. and its subsidiaries (collectively, “**CBRE Group**”) to assist you in understanding our data collection and handling practices when you apply for employment online or via direct communication (e.g., email or postal mail) or create a career profile in our online talent community platform (“**Talent Community**”), and as part of our recruitment and onboarding activities (collectively, “**Talent Acquisition**”). This Notice is also intended to assist you in making informed decisions and exercising your data privacy rights under applicable law.

Whenever this Notice refers to “CBRE”, “we”, “us” or “our”, it refers to the applicable responsible CBRE Group entity/ies defined in Appendix 1 below. Our data collection and handling practices relating to personal information of employees, contractors, and similarly employed individuals are described in our Employee Privacy Notices which will be made available to you (as applicable) in case of a successful recruiting and onboarding process.

SUMMARY

Below is a summary of the key information in this Notice. The Full Notice, with more detail, is set out below the Summary.

SCOPE	This Notice applies to the personal information relating to applicants and candidates for employment that we collect and process in connection with Talent Acquisition activities.
RESPONSIBLE ENTITY / DATA CONTROLLER	The relevant CBRE entity (or entities) responsible for collecting and processing your personal information (also known as the data controller in some jurisdictions) will depend on certain factors. Please find information on how to identify your applicable responsible CBRE entity in Appendix 1 . See details below in Information about the Responsible CBRE Entity / Data Controller .
PERSONAL INFORMATION WE COLLECT / SOURCE	We collect personal information directly from you and third parties where relevant and necessary to our Talent Acquisition activities. See details below in Personal Information We Collect and Sources .
SPECIAL CATEGORY / SENSITIVE PERSONAL INFORMATION WE COLLECT	To the extent we may lawfully do so under applicable law, as part of our Talent Acquisition activities, we will also collect diversity information (also known as special category or sensitive personal information in some jurisdictions) (“ Diversity Data ”) that you choose to provide directly to us and, where relevant or necessary based on the job you have applied for, criminal offense and conviction information that we collect from third-party providers of background checks. See details below in Personal Information We Collect and Sources .
USE OF YOUR PERSONAL INFORMATION AND LEGAL BASES	We use your personal information in connection with our Talent Acquisition and related activities. To the extent permissible or required under applicable law, we also collect Diversity Data you choose to provide and use such data (to the extent possible in an aggregated, pseudonymized format) to comply with legal obligations in the field of employment law, fulfill substantial public interests, such as to review and monitor equality of opportunity for job applicants and employees, and for other lawful purposes related to

	diversity, equity and inclusion (“ Diversity & Inclusion ”). We will not, and do not, use Diversity Data to make Talent Acquisition decisions about you or other individuals. See details below in Use of Personal Information .
DATA SHARING	The CBRE Group is a global firm and the personal information we collect or you provide may be shared and processed with responsible CBRE entities as necessary for Talent Acquisition activities and with third-party service providers who assist us with Talent Acquisition. Where we may lawfully do so under applicable law, any Diversity Data you chose to provide will be shared with the CBRE entity responsible for aggregating and pseudonymizing it and (on an aggregated and de-identified basis) with the CBRE entities responsible for managing and advancing our Diversity & Inclusion objectives. We will not share Diversity Data with third-parties, except on an aggregated, pseudonymized basis and only to the extent we may lawfully do so under applicable law. See details below in Sharing of Personal Information .
DATA RETENTION	We retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected or as otherwise legally required. See details below in Retention of Personal Information .
DATA SECURITY	We implement appropriate technical and organizational security measures to safeguard the personal information we collect and process about you against loss and unauthorized alteration or disclosure. See details below in How We Secure Your Personal Information .
COOKIES	We use cookies and related technologies to provide a better experience of our Talent Acquisition websites, subject to your consent except for essential cookies. Please see details in Our Use of Cookies below.
INTERNATIONAL DATA TRANSFERS	We may share your personal information with other CBRE entities and service providers located outside of your home country. When doing so, we provide appropriate safeguards for international data transfers as required by applicable law. See details below in International Data Transfers .
PRIVACY RIGHTS	Depending on the laws in your country, you may have certain rights to request access, rectification, deletion, objection, or other actions regarding your personal information. See details below, including how to exercise any privacy rights you may have under applicable law, in Your Data Privacy Rights .
CONTACT CBRE	You are always free to contact us if you have questions or concerns about this Notice or our personal information collection and processing activities. See details below in Contact CBRE .
DATA PROTECTION OFFICER	Where required by law, we have appointed a data protection officer whose contact details are disclosed in this Notice. Click here to learn more .
EU/UK REPRESENTATIVE	We have appointed a representative for any responsible CBRE entity located outside of the EEA and the UK that process personal information subject to the EU General Data Protection Regulation and UK data protection law. Click here to learn more .
CHANGES TO THIS NOTICE	If we make any material changes to this Notice, we will make changes here and, if the changes are significant, we will provide a more prominent notice. Where required, we will obtain your consent. See details below in Changes to this Notice .

Full Notice

In the following, you will find the full Notice with more detailed information to the Summary above.

Information About the Responsible CBRE Entity / Data Controller

Depending on the legal regulations in your country and the applicable laws to which you are subject (such as in the EU/EEA and UK), you may have the right to information on the CBRE entity responsible for collecting and processing your personal information (also known as the data controller in some jurisdictions). This may differ depending on the country in which the jobs you apply for or express interest in are located. **If you apply for a job in another country than where you reside, your personal information will be collected and processed by the responsible CBRE entities in such other country.** A list of responsible CBRE entities by country is included in [Appendix 1](#).

Use of Personal Information

Personal Information We Collect and Sources

The following chart outlines the categories of personal information that we collect, why we collect that personal information, and our legal justifications for collecting that personal information (legal basis). **Unless otherwise stated, all personal information we collect comes from you directly.**

- **Personal Contact Details:** Includes but is not limited to address, email address, emergency contact/beneficiary contact, and telephone number.
- **Name and Initials:** Includes but is not limited to name, title, initials.
- **Personal Characteristics:** Includes but is not limited to date of birth, gender, nationality, languages spoken, photograph, marital status, place of birth, and marketing preferences.
- **Online Identifiers:** Includes but is not limited to user IDs, cookies, user activity logs, IP address and social media profile.
- **Diversity Data:** Includes but is not limited to race, ethnicity, sexual orientation, and military veteran status.
- **General Human Resource Information:** Includes but is not limited to educational and employment history, relevant skills, professional certifications and affiliations, salary expectations curriculum vitae/resumés, national identification numbers as necessary to establish right to work, notice periods, willingness to relocate, and information about your outside activities or family relationships that may give rise to a conflict of interest. Where an offer is made, the details of your employment, including salary information.
- **Testing, References and Background Check Information:** Test and assessment information; reference information; information about criminal offense, conviction, pending investigations and administrative sanctions.
- **Health Information:** Includes but is not limited to, where permitted or required by applicable law, disability and other health data (for limited purposes as set out in the following table).

Category of Personal Information	Why We Collect Personal Information	Legal Basis for Collecting
Talent Community & Talent Acquisition Activities		
Personal Contact Details, Name and Initials, Personal Characteristics, and Online Identifiers.	To communicate with you about additional roles that may be of interest to you and inform you of developments at CBRE we feel may interest you.	We rely upon consent as our legal basis when communicating with you in relation to additional roles and news provided through our Talent Community.
Personal Contact Details, Name and Initials, Personal Characteristics, and Online identifiers.	To communicate with you (or your emergency contact) during the Talent Acquisition process and provide you with information in connection with your application or to undertake other engagement with us from time to time (e.g., contacting you as to similar roles which you may be interested in or collecting feedback). We collect this information directly from you, or where allowed by applicable law, as part of our recruitment research from publicly available or third party sources (e.g. LinkedIn).	We rely as our legal basis upon performance of a contract to which you are subject or to take steps at your request prior to entering into a contract (“Contract Performance”) , when communicating with you in relation to your application. We rely upon legitimate interests (as described further below) or your consent , if required to comply with local legal requirements, to send other types of communications.
Personal Contact Details, Name and Initials, Personal Characteristics, and General Human Resource Information.	To determine your qualifications and suitability for open positions . This includes assessing your right to work in a particular country or geographic location.	We rely upon Contract Performance as our legal basis when assessing your suitability for a role. However, there are certain activities, such as confirming your right to work, where such processing is for compliance with our legal obligations .
Testing information	Only to the extent allowed by applicable law, to determine your qualifications and suitability for open positions where required, we process results of additional testing you may be asked to undertake .	We rely upon Contract Performance as our legal basis when assessing your suitability for a role.
Offer & Pre-Onboarding		

<p>Personal Contact Details, Name and Initials, Personal Characteristics, General Human Resource Information, and Health Information.</p>	<p>If successful, we use this information to make an initial offer. We then carry out and manage the employee on-boarding process. This includes making reasonable adjustments to enable you to carry out a role offered to you.</p>	<p>We rely upon contract as our legal basis when assessing your suitability for a role.</p> <p>However, there are certain activities, such as making reasonable adjustments, where such processing is for compliance with our legal obligations.</p> <p>Where we process special categories of personal information as part of these checks, we do so only because it is necessary to meet obligations and rights in the field of employment and social security and social protection law.</p>
<p>Name and initials and Diversity Data.</p>	<p>To achieve lawful Diversity & Inclusion objectives, we may (where allowed by law and to the extent possible in an aggregated, pseudonymized format) collect diversity information you choose to provide. * If you do not wish to provide your personal diversity data, please select the 'Prefer not to say' option and we will respect that decision. We will not, and do not, use Diversity Data to make Talent Acquisition or other employment-related decisions about you or other individuals.</p>	<p>We process this personal information in order to comply with our legal obligations.</p> <p>However, where there is no strict legal obligation to collect this data, we will instead obtain your consent or rely upon legitimate interests (as described further below), to the extent permissible under local law requirements.</p> <p>Where we process special categories of personal information as part of our diversity and inclusion activities, we do so in line with local law requirements, such as specifically permitted reasons in the substantial public interest.</p>
<p>Reference Checks</p>	<p>Only to the extent allowed by applicable law, to determine your qualifications and suitability for open positions, we undertake reference checks to the extent necessary or relevant depending on the job you have applied for.</p>	<p>We rely upon Contract Performance as our legal basis when assessing your suitability for a role.</p>
<p>Background Check Information</p>	<p>Only to the extent allowed by applicable law and to the extent necessary, to determine your qualifications and suitability for the position for which you have been made an offer, we may initiate background checks and process results of background check data.</p>	<p>Where this obligation is required by law, we rely on our legal obligation, otherwise we rely upon Contract Performance</p>
<p>Through your use of our Talent Acquisition Platform</p>		
<p>Online identifiers.</p>	<p>To analyse and improve our Talent Acquisition services and online platform.</p>	<p>It is in our legitimate interests (as described further below) to process your personal information for these purposes.</p>
<p>Legal Activities</p>		

Any of the personal information collected from you.	To establish, exercise or defend our legal rights , to comply with lawful government requests for disclosure of personal information or otherwise to comply with legal obligations .	It is on our legitimate interests (as described further below) or necessary to comply with legal obligations to process personal information for these purposes,
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Special Categories of Personal Information

To the extent we may lawfully do so under applicable law, and as reflected in the table above, we may collect and process categories of personal information relating to you which enjoy special protection under applicable law by qualifying as special categories of personal information, sensitive personal information or similarly.

Providing Information About Others

If you provide personal information to us about any person other than yourself (e.g., name and contact information or the opinions of your references), you must ensure that such other persons understand how their information will be used and that you are permitted to disclose it to us for use in our Talent Acquisition purposes.

Is Providing Your Information Voluntary or Mandatory?

There is no legal or contractual obligation for you to provide your personal information to us. However, we require certain personal information to consider and assess applicants for employment with CBRE (“**Necessary Personal Information**”). Without your Necessary Personal Information, we cannot consider you for a job with CBRE. Necessary Personal Information does not include Diversity Data.

Legitimate Interests

To the extent, CBRE relies on its overriding legitimate interests for the processing of your personal information, we have balanced your rights and freedoms against our interests, or those of any third party, and determined your rights are not infringed. Such interests are listed in the table above, but are in particular:

- assessing your personal information for potential job openings at your request,
- determining necessary skills and qualifications for a particular job,
- improving the Talent Community and our Talent Acquisition activities,
- to establish, exercise or defend our legal rights and claims, and
- compliance with CBRE internal policies and requirements for recruiting.

To the extent any of the processing purposes listed above require the processing of Special Categories of Information, such processing may in particular be permitted under applicable law as the processing is necessary to carry out certain obligations or exercise certain rights in the field of employment, social security and social protection, to establish, exercise or defend a legal claim, for reasons of substantial public interest or of public interest in the area of public health, and other necessary objectives or based on your consent (if required by law).

Automated Processing – Eligibility Criteria

If you apply for an open position, you will be asked to provide personal information in response to certain standard questions (such as Right to Work information), as well as some that are specific to the position for which you are applying (such as certain professional qualifications or licenses), which are required as minimum qualifications to be eligible for consideration. If you do not respond or your responses to these questions indicate that you do not meet the requirements of the position, if legally permissible to do so, our system will automatically disqualify you from consideration and your application will not be presented to and not further considered by our team for review. Where necessary to comply with applicable law (such as in the EU/EEA and UK), the decision-making process will include human intervention to determine whether you meet the eligibility criteria for positions for which you have applied.

Sharing of Personal Information

Where we can do so lawfully under applicable law, we may share personal information with the following categories of recipients, some of whom may be located in a country that does not provide an adequate level of data privacy and protection rights as your home country. CBRE has in place appropriate safeguards regarding internal personal information sharing. See [International Data Transfers](#) below for more information.

Internally with Other CBRE Entities

CBRE is a global firm and the personal information we collect, or you provide may be shared and processed with CBRE entities as necessary for the purposes identified in [Section 3 – Use of Personal Information](#) and Legal Bases, above. The potentially relevant CBRE entities are identified in [Appendix 1](#). In particular:

- When you apply for or express interest in seeking employment outside your home country, your personal information will be processed by a responsible CBRE entity that is located in a country other than your home country (see information in Appendix 1).
- As part of the assessment of your job application, CBRE's matrix structure may require that your Personal information is transferred to other CBRE entities outside your home country where individuals involved in the decision-making process for your application are located (e.g., regional HR department, matrix manager, line manager, etc.).
- Where CBRE acquires a legal entity, and at your request, we may share your Personal information with a CBRE affiliate for the purpose of assessing a job application at that new entity.
- Where legally permissible to process and transfer Diversity Data outside your home country, and if you provide it, your Diversity Data may be shared with other CBRE entities outside your home country to further foster diversity within our CBRE Group. To the extent possible, we will share such data in an aggregated, pseudonymized format.

With Third-Parties

- **Service Providers** who assist us with Talent Acquisition activities, such as recruit agents, evaluation service providers, and IT and data hosting providers. This includes third-party agencies and job boards who refer candidates for consideration in CBRE employment opportunities, background check providers for performing background checks of select job applicants, and telecommunication companies to perform video and audio interviews of job applicants (but only as allowed by applicable law). These third-party service providers are engaged on our behalf and act upon our instruction as data processors / service providers.
- **Consultants and advisors** who assist us with legal, regulatory, and business operations activities, such as legal counsel, compliance consultants and business auditors.
- **Diversity & Inclusion (Governmental) Regulators**, as necessary to comply with CBRE's legal obligations in the area of employment law in certain countries; we may share Diversity Data on an aggregated, de-identified basis only.
- **Business partners in case of a merger or sale**, such as if CBRE is merged with another organization, or in the event of a transfer of our assets or operations.

Legally Compelled Disclosure

We may be required to disclose your personal information to governmental and regulatory authorities, law enforcement agencies, courts and/or litigants when legally compelled to do so, for example, in response to a court order, subpoena or other lawful, legally-binding request, including to meet national security or law enforcement agencies requirements, or in connection with legal proceedings or similar processes as necessary to exercise or defend our legal rights.

CBRE is committed to not disclose your personal information in response to an international court order or a subpoena or other legal obligation, unless we are legally compelled to do so under applicable law. In particular, CBRE, Inc. has assessed and is of the view that neither it nor its US subsidiaries qualify as a provider of electronic communication service, as defined in 18 U.S.C. § 2510, nor a provider of a remote computing service, as defined in 18 U.S.C. § 2711, and thus US public authorities cannot issue a legally binding demand for disclosure of data under Section 702 of the US Foreign Intelligence Surveillance Act ("**FISA 702**") upon CBRE, Inc. or its US subsidiaries. In case CBRE nevertheless receives at some point a disclosure demand for personal information under FISA 702, it will

publish a Transparency Report on cbre.com and our EEA websites (see our Schrems II statement). All personal information transferred by CBRE to the US is encrypted in transit.

Retention of Personal Information

We will only retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected, or as otherwise legally required.

Generally, we retain your information for a recruitment purpose, or as required by applicable law:

- **Retention for recruitment exercise:** Local applicable law stipulates how long certain personal information relevant to recruitment should be retained. CBRE follows all applicable law with respect of your personal information related to a recruitment exercise, or otherwise holds your data for a period of 6 months in the EEA or 12 months in all other countries.
- **Retention for ongoing recruitment purposes:** At the time of collecting your information, we will ask you whether you would like to be contacted about other jobs and future opportunities at CBRE which we believe may be relevant to you, your skills and experience. If you do express interest in, and consent to, being contacted for ongoing recruitment, we will do so only for as long as necessary, being no longer than 6 months. We will contact you from time to time to confirm your ongoing interest for use of your personal information for such purposes.

How We Secure Your Personal Information

We implement appropriate technical and organizational security measures to safeguard the personal information we collect and process about you against loss and unauthorized alteration or disclosure. The information you provide is encrypted in transit and at rest. We utilize role-based access controls to limit access to your personal information on a strict need-to-know basis consistent with the purposes for which we have collected such information. We utilize anti-malware and intrusion detection systems to guard against unauthorized access to our network, and we have an incident response plan in place to quickly respond to any suspected leak or breach of personal information.

Where we share your personal information with our service providers, we have assessed that their technical and organizational measures provide an appropriate level of security.

Our Use of Cookies and Similar Technologies

We use cookies and similar technologies to collect your personal information when you browse our Careers website (careers.cbre.com). Our cookie preference center allows you to restrict our use of cookies other than Essential Cookies.

What is a Cookie:

A cookie is a small text file that a website stores on your personal computer, telephone or any other device, with information about your navigation on that website. Cookies serve various purposes such as allowing you to navigate between pages efficiently, remembering your preferences, analyzing the use of our Careers website, generally improving the user experience, and ensuring that the advertisements you see online are more relevant to you and your interests. A cookie contains the name of the server it came from, the expiry of the cookie, a value – usually a randomly generated unique number as well as other data relating to your use of our Careers website. Depending on the applicable data protection law, such information and data may qualify as personal information.

Cookies Used by Us

How we use Cookies:

We use session cookies, which are temporary cookies that are erased from your device's memory when you close your Internet browser or turn your computer off, and persistent cookies, which are stored on your device until they expire, unless you delete them before that time. We group cookies on our Careers website into four categories.

- *Essential Cookies:* These cookies are necessary to operate and enable the basic functionality of the site. These cookies may also be used to remember and honor your cookie preferences via our cookie preference center. They cannot be disabled.
- *Functional Cookies:* These cookies are used to provide you with a better experience on our Careers website. For example, they may be used to embed a video player.
- *Performance Cookies:* These cookies are used to measure visits to the Careers website and better understand how our Careers website is used in order to improve the site's functionality and performance.
- *Integrations Cookies:* These cookies are used to enable integrations with other sites. For example, they may be used to enable you to import your profile from a third-party professional networking site.

What type of cookies do we use:

Details on the cookies used on our Careers website are provided in the cookie preference center available via the link "Cookie Preferences" on the button of our Careers website. Please click on "Detailed Settings" in the sections on Functional Cookies, Performance Cookies and Integrations Cookies.

Consent requirements:

Depending on the applicable data protection law, we may only place and use Functional Cookies, Performance Cookies and Integrations Cookies if you have given your consent via our cookie banner. Our cookie preference center on our Careers website allows you to make further choices and/or withdraw a consent regarding our use of cookies (with the exception of Essential Cookies).

Performance Tracking via Similar Tracking Technologies

We sometimes use performance tracking technologies, such as web beacons, pixel and tags, within our marketing emails or within advertisements displayed on our Careers website or third party websites. These performance tracking technologies may be provided by us or by third parties and they help us to track whether an email recipient has completed an event, such as opening a link we provided in the email, or a user has clicked on advertisement. Further information on the performance tracking technologies used in our marketing emails and on our Careers website or third party websites are available via the link "Cookie Preferences" on the button of our Site. Please click on "Detailed Settings" in the sections on Functional Cookies, Performance Cookies and Integrations Cookies.

Managing Your Cookie Preferences

Cookie Preference Center:

Our cookie preference center on our Careers website allows you to make choices regarding our use of cookies (with the exception of Essential Cookies).

If you clear your cookies in your browser settings, this will remove all cookies including the preference cookie set to honor your choices made in our cookie preference center. You will be presented with the cookie banner on your next visit to on the Careers website to re-consent to cookies where required.

Do Not Track:

We currently do not respond to "Do Not Track" signals from your browser. Our use of tracking technologies may instead be controlled through our cookie preference center.

Disabling and Preventing Further Use of Cookies:

In addition to restricting cookies in our cookie preference center, you may restrict, block or delete the cookies from our Careers website at any time by changing the configuration of your browser. You can find out how to do this, and find more information on cookies, at <https://www.allaboutcookies.org/>. In addition, while each browser has different settings and configurations, cookies settings can typically be adjusted in the "Preferences" or "Tools" menu of your browser. Your browser's "Help" menu may provide additional information. Note, however, that deleting or blocking Required Cookies will cause the Site to not function properly.

International Data Transfers

Depending on the CBRE entity that is the responsible CBRE entity (see [Appendix 1](#) below) and the recipients (see [Sharing of Personal Information](#) above), your personal information may be processed and hosted in countries other

than your home country, such as Argentina, Australia, India, Malaysia, Poland, **United Kingdom, and United States**. Those other countries may have less stringent data protection laws than the country in which you reside, in which you initially provided the information and/or in which your information was originally collected.

In case of international data transfers, we will protect your personal information as required by all applicable data protection laws.

EEA and UK to Non-EEA Data Transfers

With respect to international data transfers initiated by CBRE from the European Economic Area ("EEA") or UK to recipients in any non-EEA jurisdictions,

- some recipients are located in countries which are considered as providing for an adequate level of data protection under EU law (or UK law, as applicable). These transfers do not, therefore, require any additional safeguards under EU (or UK, as applicable) data protection law.
- other recipients are located in countries not providing an adequate level of data protection under EU or UK law, such as the US or the Philippines and, where required by law, we have implemented appropriate safeguards, such as EU Standard Contractual Clauses, and/or are relying on binding corporate rules of the recipient or an appropriate derogation. Where applicable, we implement supplementary technical and contractual safeguards. Under applicable law you may have the right to ask for further information on such appropriate safeguards (see [Section 9 - Contact CBRE](#) below).

As stated above (see [Legally Compelled Disclosures](#)), CBRE, Inc. has assessed and is of the view that US public authorities cannot issue a lawful disclosure demand for personal information under FISA 702 upon CBRE, Inc. or its US subsidiaries. All personal information transferred by CBRE to the US is encrypted in transit.

Your Data Privacy Rights

Depending on the legal regulations in your country and the applicable laws to which you are subject, you may have all or some of the following rights set out below and may submit a request(s) to exercise any such rights through our [Data Subject Rights Portal](#) or by contacting us at dsr@cbre.com. Irrespective of the CBRE entity that is responsible for the processing of your personal information, you may use such centralized contact details and CBRE will ensure that the responsible CBRE entity receives your request and addresses it promptly as required by applicable law. CBRE will respond to your request comprehensively, even if you do not identify the particular CBRE entity against whom you make the request.

- Right of access:** You may have the right to obtain from CBRE confirmation as to whether your personal information is being processed, and, where that is the case, to request access to your personal information. You may have the right to obtain a copy of your personal information undergoing processing. For additional copies requested by you, CBRE may charge a reasonable fee based on administrative costs.
- Right to rectification:** You may have the right to obtain from CBRE the rectification of inaccurate personal information concerning you.
- Right to erasure (right to be forgotten) or anonymization:** You may have the right to ask us to erase (or in some jurisdictions, anonymize) your personal information. In some jurisdictions, this right may be limited to deletion or anonymization of data that is unnecessary, excessive, or unlawfully processed, or deletion of data that is processed based on your consent.
- Right to restriction of processing:** You may have the right to request the restriction of processing your personal information.
- Right to data portability:** You may have the right to receive your personal information which you have provided to CBRE in a structured, commonly used and machine-readable format and you may have the right to transmit those personal information to another entity without hindrance.
- Right to withdraw consent:** If we rely on your consent for any personal information processing activities, you have the right to withdraw or revoke this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. This right to withdraw consent applies in particular to consents given for marketing and profiling purposes, if any.

g. **Right to object:** Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information by CBRE, and CBRE can be required to no longer process your personal information unless CBRE demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. The right to object may, in particular, not exist if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

- h. **Right to request an explanation** of our processing activity of your personal information.
- i. **Right to information on the possibility to withhold consent** and information on the consequences of doing so.
- j. **Right to information on third parties with whom we have shared your data.**
- k. **Right to lodge a complaint with the competent data protection authority** in your home country or in the country in which the responsible CBRE entity is located, in particular with respect to the result of automated decision-making. A list of European Union Data Protection Authorities is [available](#) from the European Data Protection Board. In Brazil, the competent data protection authority is the *Autoridade Nacional de Proteção de Dados* (ANPD).

Brazil

In addition to other rights provided under applicable law, with respect to personal information collected and processed within Brazil, you may have the right to request review of decisions taken solely based on the automated processing of personal information which affects your interests, including decisions aimed at defining their personal, professional, consumption and credit profiles or aspects of their personality.

China

In addition to other rights provided under applicable law, with respect to personal information collected and processed within China, you may have a right to:

Right to deregister as a user of an application and cancel online accounts.

California Consumer Privacy Policy

If you are a resident of the State of California (“Consumer”), CBRE’s California Consumer Privacy Policy (“California Policy”) supplements the information provided in this Notice and includes information about your privacy rights and how to exercise them. The California Policy applies solely to personal information we have collected from individuals who are residents of the State of California in the twelve (12) months preceding date on which the California Policy was last updated.

Contact CBRE

You are always free to contact us if you have questions or concerns regarding this Notice or our data handling practices. We may contact you by email in relation to any questions and concerns you raise. If you prefer us to contact you in an alternative manner, please let us know and we will accommodate your request if possible and appropriate.

General Enquiries

You may contact CBRE’s Global Data Privacy Office (“**GDPO**”) at Privacy.Office@cbre.com or by writing to us at 321 North Clark Street, Suite 3400, Chicago, Illinois 60654, Attention: Global Director, Data Privacy. You may also raise questions or concerns about the GDPO to CBRE’s Ethics & Compliance department via the CBRE Ethics Helpline.

Individuals in Europe, the Middle East or Africa:

If you are located in Europe, the Middle East or Africa, you may also e-mail us via the GDPO at EMEAPrivacyDirector@cbre.com or write to us at St. Martins Court, 10 Paternoster Row, London EC4M 7HP, United Kingdom, Attention: EMEA Director, Data Privacy.

Individuals in Asia or the Pacific:

If you are located in Asia or the Pacific, you may also e-mail us via the GDPO at APACPrivacyHelpline@cbre.com or write to us at 15/F M1 Tower, 141 H.V. Dela Costa Street, Salcedo Village, Makati City, Philippines 1227, Attention: APAC Senior Manager, Data Privacy.

Data Protection Officers

In some countries, CBRE has appointed a Data Protection Officer (“**DPO**”), whom you may contact with questions or concerns about how CBRE processes your personal information. Contact information for our DPOs in the European Union, the UK and Brazil is available in our [Global Privacy and Cookie Notice](#).

EU and UK Representative

We have appointed a representative for the responsible CBRE entities located outside of the EEA and UK that process your personal information subject to the EU General Data Protection Regulation and UK data protection law. The representatives contact details are available in our [Global Privacy and Cookie Notice](#).

Changes to this Notice

We are a rapidly evolving, global business. We will continue to assess and make changes to this Notice from time to time as required. If we make any material changes to this Notice, we will make changes here and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Notice changes). Where required, we will obtain your consent.

Appendix 1

In the table below, the responsible CBRE entity (also referred to as data controller in some jurisdictions) for your personal information have been identified, depending on various factors of the processing activity.

If it is unclear to you which CBRE entity is the responsible CBRE entity for the processing of your personal information, please contact privacy.office@cbre.com and we will help you identify the responsible CBRE entity.

	Processing Activity	Responsible CBRE Entity / Data Controller
A.	Processing and hosting of your personal information in your career profile at Talent Community (without specific job application by you).	The relevant CBRE entity located in your country of residence is the responsible entity for your personal information. Please click on this link to see attached list of CBRE entities by country.
B.	Processing of your personal information relating to a specific job application (including the personal information contained in your career profile).	The CBRE entity that offers the job opening for which you apply is the responsible entity for your personal information. See link to list in Processing Activity A above regarding the contact details of the CBRE entities.
C.	Processing of any Diversity Data you choose to provide in relation to a specific job application (if permitted under applicable law).	CBRE, Inc. and/or the respective CBRE entity that has made the offer and will become your employer. See link to list in Processing Activity A above regarding the contact details of the CBRE entities.
D.	Processing of your personal information once a verbal (conditional) offer as been made - onboarding phase	The CBRE entity that has made the offer and will become your employer. See link to list in Processing Activity A above regarding the contact details of the CBRE entities.
E.	Processing of your cookie and web analytics data.	CBRE, Inc. 2100 McKinney Avenue, Suite 1250 Dallas, TX 75201 Tel +1 214 979 6100

INTERNAL CHANGE CONTROL – NOT TO BE PUBLISHED

Version	Date	Summary of changes
1.0	December 2020	Initial release
1.1	March 2021	Small edits to descriptions of data categories
1.2	November 2021	Updating information on data retention
1.3	April 2022	Structural improvements to the Notice for readability and to highlight purposes of use and legal bases in the recruitment process; updates to data retention information.