

# DATA PROTECTION NOTICE

## FOR UAE JOB APPLICANTS EFFECTIVE FEBRUARY 2026 (AS AMENDED)

### 1. INTRODUCTION

The purpose of this Data Protection Notice (this “**Notice**”) is to inform individuals who apply for a position or an internship at Morgan, Lewis & Bockius LLP, with branch offices at:

- Abu Dhabi Global Market Square, Al Sila Tower, Level 21, P.O. Box 764620, Abu Dhabi, United Arab Emirates; and
- Level 12, Tower A, The Offices, One Za’abeel, Za’abeel Palace Street - Za’abeel 1, P.O. Box 504903, Dubai, United Arab Emirates

(the “**Firm**”, “**we**”, or “**us**”) on the collection, use, disclosure, transfer, and other processing of their individually identifiable information (“**Personal Data**”). Under applicable privacy laws, including, but not limited to, the Abu Dhabi Global Markets (ADGM) Data Protection Regulations 2021 (“**DPR 2021**”), Federal Decree-Law No. 45/2021 “On the Protection of Personal Data”, and any implementing and supplementing laws and regulations in the UAE (“**Data Privacy Laws**”), the Firm is the data controller of the Personal Data covered by this Notice. Please also review our [Global Privacy Policy](#), which is incorporated by reference into this Notice.

### 2. PERSONAL DATA

Throughout the course of your application process with the Firm and solely in relation to this process for the purposes as described below, we process certain Personal

Data about you. The Personal Data may include the following categories:

- **Contact Information:** such as full name, including title; name at birth and preferred name; home and work address; home and work phone number; personal and work email address; mobile phone number; job title; and any other contact details provided to us.
- **Education:** such as CV/résumé information and education and degrees, including grades and exam certificates.
- **Other HR Data:** such as nationality; passport/passport number; validity and issue information; residency and visa status; date of birth; birth city and country; gender; marital status; your image; primary languages; language skills; visa type and information (work permit/business/etc.); religion and sect (to the extent permitted under applicable Data Privacy Laws); and emergency contact details.
- **Travel Details:** such as flight, train, rental car, and hotel bookings and other similar information.
- **Work History Information:** such as current employer; prior work history; references; criminal record checks (to the extent permitted under applicable Data Privacy Laws); function and work location; memberships and affiliations; work experience; references; compensation history; and any information on you found from searches

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of publicly available information, including of social media.

- **Compliance Information:** such as information required for regulatory or compliance purposes, such as information relating to outside business activities.
- **Security Data:** such as details for passcards and CCTV footage in public areas.
- **Reimbursement Information:** such as banking information necessary to make payments to the applicant data subject.
- **Health Information:** such as health information related to the position and disability information. This type of Personal Data (known as special categories of data) will only be processed to the extent permitted under applicable Data Privacy Laws and where required for the relevant purposes.

### 3. SOURCES OF PERSONAL DATA

We may obtain Personal Data about you from the following sources:

- Directly from you, such as through our website or the firm's Human Resources department, or via other forms or information you provide to us during the application process; and
- From third parties, including recruiters and employment agencies; references from third parties and other background screening checks, subject to the requirements of applicable Data Privacy Laws; and from former employers.

### 4. PURPOSES FOR PROCESSING PERSONAL DATA

The Firm processes your Personal Data to comply with applicable laws and regulations, to meet its business

needs and legal obligations in order, and to process your job application, such as:

- Managing the job application process and potential employment relationship;
- Conducting surveys and monitoring and reporting equality statistics and similar information including on an anonymous basis;
- Tracking and budgeting travel and expenses for individuals who apply for a position or an internship;
- Performing talent management functions;
- Coordinating and tracking event registration, attendance, and activities;
- Implementing public health measures to the extent permitted by applicable law, including collection of health information and testing and tracing measures;
- Exercising its rights under local laws and compliance with applicable legal and regulatory requests and obligations (including investigations in relation to the same) and audit requirements;
- Establishing or defending legal claims and allegations; and
- Reviewing, organising and indexing data and deploying enterprise tools.

We will not use your Personal Data for marketing purposes unless you expressly consent to us doing so.

The Firm may process your Personal Data using (1) cloud services, and (2) artificial intelligence (including portable models) in a closed, proprietary environment. Such cloud and artificial intelligence services may be hosted in the United States (US), United Kingdom (UK), and/or other countries, including those that do not provide the same level of data protection as the jurisdiction in which you reside. The Firm will exercise due diligence in its selection of these services and will ensure that adequate technical and organizational security measures are in

place to safeguard your Personal Data through use of these services.

We will not use your Personal Data for automated decision making, including profiling.

## 5. DISCLOSURE OF PERSONAL DATA

Your Personal Data will be disclosed within the Firm to management and otherwise to those individuals who need access to your Personal Data to perform their duties for the purposes listed in Section 4 above or where required or permitted by applicable law or as set out in this Notice.

The Firm may also disclose your Personal Data to other Morgan Lewis-affiliated entities and offices (the “**Morgan Lewis Partnership**”) for pursuing the purposes listed in Section 4 above or where required by applicable law. Within the Morgan Lewis Partnership, your Personal Data will be disclosed only to a limited number of relevant individuals such as partners, managers, advisors, or specialists within the Information Technology, Human Resources, Legal, Finance, Operations, Compliance, and Accounting departments, to the extent they need access to your Personal Data for these purposes.

The Firm may also disclose your Personal Data to third parties providing information technology support or technical and organisational services in connection with human resources-related activities; or legal, audit, or other advisors and other service providers. The Firm will exercise appropriate due diligence in its selection of these providers. Among other things, the Firm will require that such providers maintain adequate technical and organisational security measures to safeguard your Personal Data, and to process your Personal Data only as instructed by the Firm and for no other purposes and comply with the privacy and security standards described in this Notice.

To comply with the law or respond to compulsory legal processes (such as a search warrant or court order), or in response to a request for information from a regulator or

governmental authority, or in the course of actual or anticipated litigation or otherwise for legal purposes, i.e. to other law firms, courts, or government authorities.

## 6. INTERNATIONAL TRANSFER OF PERSONAL DATA

Due to the global nature of the Firm, some entities listed in Section 5 above may be located in countries, including the United States, that may not provide a level of data protection equivalent to that set forth by the applicable laws in your home country. The Firm has taken appropriate steps to ensure that such entities process Personal Data in accordance with applicable law. To the extent that the Firm transfers your Personal Data to entities which are located outside the UAE and/or ADGM, the Firm will provide an adequate level of protection to your Personal Data. For this purpose, the Firm uses “controller” standard contractual clauses in the form approved by the relevant supervisory authorities or similar legal tools.

Please note that our information technology systems, including email, are hosted and all data is stored on servers located in the US.

## 7. LEGAL BASIS FOR PROCESSING PERSONAL DATA

The Firm’s employment relationship, contractual (and pre-contractual), and legal obligations in the field of employment, as well as its legitimate business interests under the Data Privacy Laws, form the legal basis of the processing described in this Notice. The Firm’s legitimate interests or those of a third party include our requirements to use your Personal Data in litigation or for other legal or regulatory purposes involving the Firm and/or any affiliate of the Firm and may also include the need to transfer your Personal Data to third countries with differing data protection laws.

## 8. DATA SECURITY

We maintain physical, technical, and organisational security measures to protect Personal Data against foreseeable risks, including accidental, unlawful, or unauthorised use, access, disclosure, destruction, loss, or modification, whether it is processed in your local jurisdiction, in the United States, or elsewhere.

## 9. RETENTION, ACCESS, AND ACCURACY OF PERSONAL DATA

We intend to keep your Personal Data accurate and up to date. We also strive to retain your Personal Data no longer than is necessary to carry out the purposes listed in this Notice or as required by law. The Firm retains your Personal Data for up to six to 12 months following the end of your job application process or, if you become employed or engaged by the Firm, from the end of your employment or other business relationship in accordance with applicable law. However, the Firm will retain legal documents in connection with the termination of your job application process for as long as such termination may be in dispute or can be legally challenged by you.

If changes need to be made to your Personal Data, notify the Morgan Lewis Privacy Office (as identified below) in writing right away. Under applicable law, you have rights to:

- (a) inquire whether we process Personal Data about you and to access such data;
- (b) request correction of your Personal Data that is inaccurate;
- (c) obtain information related to the Firm's policies and practices in relation to your Personal Data;
- (d) transfer your Personal Data to a third party (data portability);
- (e) request the erasure of your Personal Data; and
- (f) request the restriction of processing of Personal Data concerning you.

In certain circumstances, you also may have the right to object for legitimate reasons to the processing of your Personal Data in accordance with the Data Privacy Laws. To exercise any of these rights, you may contact the Morgan Lewis Privacy Office at [MLPrivacyOffice@morganlewis.com](mailto:MLPrivacyOffice@morganlewis.com). The Morgan Lewis Privacy Office serves as the data protection officer of the Firm. In addition, the Firm has a local data protection officer in its Dubai office, where required, that may be contacted using the same email address.

## 10. RIGHT TO RAISE CONCERNS

You have the right to raise concerns to the Firm or to a supervisory authority about the Firm's processing of your Personal Data. If you wish to raise concerns with the Firm, please contact the Morgan Lewis Privacy Office at [MLPrivacyOffice@morganlewis.com](mailto:MLPrivacyOffice@morganlewis.com). The applicable supervisory authority of the Firm is the Commissioner of Data Protection.

## 11. QUESTIONS

If you have any questions about this Notice or wish to (a) access or review your Personal Data or learn more about who has access to your Personal Data, or (b) make another type of request related to your Personal Data, please contact the Morgan Lewis Privacy Office at [MLPrivacyOffice@morganlewis.com](mailto:MLPrivacyOffice@morganlewis.com).

## 12. CHANGES TO THE NOTICE

Should we change our Personal Data practices or this Notice, we will issue a revised Notice and/or take other steps to notify you of the changes in accordance with applicable Data Privacy Laws.