

Recruitment Privacy Notice

Effective Date: 7 July 2026

Last Modified: 7 July 2026

Purpose

Schweitzer-Mauduit International SARL and its affiliated companies ("SWM," "we," "our," or "us") are committed to protecting the privacy and security of the personal information of individuals who apply for employment opportunities with SWM.

This Recruitment Privacy Notice explains how SWM collects, uses, stores, shares, transfers, and otherwise processes personal information relating to applicants, candidates, interns, temporary workers, agency workers, contractors, consultants, and other individuals participating in SWM recruitment and hiring processes.

This Recruitment Privacy Notice applies throughout the recruitment lifecycle, from initial application through hiring decisions and any subsequent retention of candidate information.

SWM operates globally through affiliated companies and conducts business in numerous jurisdictions, including Europe, the United States, Brazil, China, the United Arab Emirates, and other countries.

Where required by applicable law, SWM may provide supplemental privacy notices or take certain measures applicable to specific countries, recruiting programs, technologies, or processing activities. Such supplemental notices shall supplement and prevail over this Recruitment Privacy Notice in relation to the jurisdiction in which the notices are relevant and only to the extent of any inconsistency.

Who Is Responsible for Your Personal Information?

The data controller for your personal information is generally the SWM entity conducting the recruitment process or the SWM entity that would employ or engage you if an offer is accepted.

For privacy-related inquiries regarding recruitment activities, please contact compliance@swmintl.com.

Mailing Address

Schweitzer-Mauduit International SARL
25 Rue Edmond Reuter
L-5326 Contern
Grand Duchy of Luxembourg

What Personal Information Do We Collect?

Depending on the position and applicable legal requirements, SWM may collect and process the following categories of personal information.

Identification Information: full name; date of birth; nationality or citizenship; government-issued identification information; work authorization information; immigration or residency status; and photograph(s) where voluntarily provided

Contact Information: home address; mailing address; personal email address; telephone numbers; and LinkedIn profile and professional networking information

Professional and Educational Information: résumé or curriculum vitae (CV); cover letter; educational history; degrees, diplomas, and certifications; employment history; skills and competencies; professional licenses; professional memberships; language capabilities; and career aspirations

Recruitment Information: interview notes; evaluation records; assessment or testing results; reference information; compensation expectations; availability and start date information; relocation preferences; and hiring recommendations

Legal and Compliance Information: right-to-work documentation; residency permits; Visa information; immigration compliance documentation; and screening information where legally permitted

Technical Information:

Where applications are submitted electronically, SWM may collect IP addresses, device information, browser information, website activity logs, and recruitment system usage information.

Sensitive Personal Information

Where permitted or required by law, SWM may process limited sensitive personal information, including information relating to disabilities or workplace accommodations, health-related information necessary for accommodations, immigration or citizenship information required for employment eligibility, diversity and equal-opportunity information where legally permitted, and other sensitive information voluntarily disclosed by candidates and relevant to the recruitment process.

SWM requests and processes sensitive personal information only where necessary and legally permissible.

Personal Data Collection

SWM may collect personal information directly from you through applications, interviews, assessments, and communications; through applicant tracking systems and recruitment technology platforms used by SWM; through recruitment agencies and executive search firms; through employee referrals; from references you identify; through employment and education verification providers; through professional

networking websites and publicly available professional sources relevant to employment opportunities; through background screening providers where legally permitted; from governmental authorities where legally permitted; and from affiliated SWM entities involved in the recruitment process.

You are not legally required to provide personal information; however, failure to provide information necessary to evaluate your candidacy may affect SWM's ability to consider your application.

Personal Data Use

SWM processes candidate information in order to review and evaluate applications; assess qualifications and suitability for employment; conduct interviews; manage recruitment processes; verify qualifications and credentials; communicate with candidates; evaluate technical, professional, and interpersonal competencies; make hiring decisions; prepare and extend employment offers; maintain recruitment records; comply with legal and regulatory obligations; defend legal claims; protect SWM's legitimate business interests; and improve recruitment processes and workforce planning.

Background Screening and Verification

Where permitted by applicable law and appropriate for the position, SWM may conduct pre-employment screening and verification activities, including verification of employment history; verification of educational qualifications; verification of professional licenses and certifications; reference checks; work authorization verification; sanctions screening; identity verification; and other lawful background checks relevant to the position.

Such activities will only be conducted in compliance with applicable laws and regulations.

Equal Employment Opportunity and Diversity

SWM is committed to equal employment opportunity and non-discrimination.

Where permitted or required by law, SWM may process certain personal information to monitor diversity and inclusion initiatives; comply with anti-discrimination obligations; provide reasonable accommodations; support equal employment opportunity programs; and satisfy legal reporting obligations.

Legal Bases for Processing

Where required under applicable privacy laws, including the General Data Protection Regulation ("GDPR"), SWM processes personal information on one or more of the following legal bases:

Performance of Pre-Contractual Measures

Processing necessary to evaluate candidates and take steps prior to entering into an employment, internship, consulting, or contractor relationship.

Compliance with Legal Obligations

Processing necessary to comply with labor, employment, immigration, tax, health and safety, anti-discrimination, and other legal requirements.

Legitimate Interests

Processing necessary for candidate evaluation; recruitment administration; internal reporting; workforce planning; talent acquisition; organizational planning; security; fraud prevention; and protection against legal claims.

Consent

Where required by law, SWM may rely on consent, including for retention of candidate information for future opportunities; processing certain categories of sensitive personal information; and other processing activities requiring consent under applicable law.

Candidates may withdraw consent at any time. However, withdrawal does not affect processing performed prior to withdrawal.

Who Receives Your Information?

Personal information may be shared internally with Human Resources personnel; talent acquisition personnel; hiring managers; interview teams; company leadership involved in hiring decisions; and legal, compliance, and information security personnel where necessary.

Personal information may also be shared externally with SWM affiliated companies; recruitment service providers; recruitment technology providers; applicant tracking system providers; background screening providers; employment verification providers; information technology service providers; professional advisors; auditors; government authorities; and courts and tribunals where legally required.

Recipients may access personal information only to the extent that it is reasonably necessary to perform their duties.

Opportunities Across the SWM Group

Because SWM operates through affiliated companies worldwide, candidate information may be shared among SWM entities for purposes of evaluating candidates for employment opportunities within the broader SWM group.

Such sharing will occur only where appropriate and in accordance with applicable law.

International Transfers

As a global organization, SWM may transfer personal information among SWM entities and service providers located in different countries.

Such countries may not always provide the same level of legal protection as the country in which the information was originally collected.

Where required by law, SWM implements appropriate safeguards for international transfers, including European Commission Standard Contractual Clauses; EU-U.S. Data Privacy Framework mechanisms where applicable; contractual protections; technical and organizational security measures; and other transfer mechanisms recognized under applicable law.

Where personal information originating in China is transferred outside China, SWM will comply with applicable requirements of the Personal Information Protection Law ("PIPL") and related regulations.

Information regarding transfer safeguards may be requested by contacting compliance@swmintl.com.

Data Retention

If you are not hired, SWM generally retains candidate information during the recruitment process and for up to two (2) years following the last interaction with the candidate.

SWM may retain candidate information for future employment opportunities only where the candidate has provided consent or applicable law otherwise permits such retention.

If a candidate is hired, relevant recruitment information may become part of the employee's personnel file and be retained in accordance with SWM employee record retention practices.

SWM may also retain information for longer periods where it is reasonably necessary to comply with legal obligations; resolve disputes; respond to regulatory inquiries; establish, exercise, or defend legal claims; or enforce legal rights and agreements.

Upon expiration of the applicable retention period, SWM will securely delete or anonymize personal information unless continued retention is required by law or necessary to establish, exercise, or defend legal claims. Such deletion of your personal data is irreversible and we will no longer be able to communicate it to you after this period. At most, we may only store anonymous data for statistical purposes.

Data Protection

SWM maintains technical, administrative, and organizational safeguards designed to protect personal information against unauthorized access, accidental disclosure, loss, misuse, alteration, and destruction.

While SWM takes reasonable measures to protect personal information, no security system can guarantee absolute security.

Automated Decision-Making

SWM does not make hiring decisions based solely on automated processing, including profiling, that produces legal or similarly significant effects on candidates except where permitted by applicable law.

Recruitment decisions involve meaningful human review and assessment.

Your Privacy Rights

Depending on your location and applicable law, you may have the right to access and copy your personal data as long as this request is not in contradiction with business secrecy, confidentiality, or the secrecy of correspondence; correct personal data that is incorrect, obsolete or incomplete; request deletion of personal information that is not essential to the proper functioning of our services; restrict processing; object to processing for commercial prospecting purposes, as well as to processing based on our legitimate interest, unless there are compelling legitimate reasons for such processing and override your interests, rights and freedoms; request portability of personal information, which allows you to retrieve part of your personal data in order to store or transmit it easily from one information system to another; withdraw consent; receive information regarding processing activities; and file complaints with applicable supervisory authorities.

In order for a request to be considered, it is imperative that it be made directly by you, or your representative at compliance@swmintl.com.

Requests cannot come from anyone other than you or your representative. We may therefore ask you to provide proof of identity if there is any doubt about the identity of the applicant, as well as justification for representation.

We will respond to your request as soon as possible with a maximum delay of one month from its receipt, unless the request is technically complex or we receive many requests at the same time. In this case, the response time may be a maximum of three months.

Please note that we can always refuse to respond to any excessive or unfounded request, particularly in view of its repetitive nature.

You may also file a complaint with the applicable supervisory authority or regulatory body in your jurisdiction.

Region-Specific Rights

European Economic Area

Candidates located within the European Economic Area may exercise rights available under the General Data Protection Regulation ("GDPR"), including access; rectification; erasure; restriction of processing; objection to processing; data portability; and withdrawal of consent where applicable.

Candidates may also lodge complaints with the relevant supervisory authority, including:

Luxembourg

Commission Nationale pour la Protection des Données (CNPD)

France

Commission Nationale de l'Informatique et des Libertés (CNIL)

Poland

Urząd Ochrony Danych Osobowych (UODO)

or the supervisory authority responsible for their place of residence, employment, or alleged infringement.

Brazil

Candidates located in Brazil may exercise rights available under the Lei Geral de Proteção de Dados ("LGPD"), including rights relating to access, correction, deletion, portability, and information regarding processing activities.

China

Candidates located in China may exercise rights available under the Personal Information Protection Law ("PIPL"), including rights relating to access, correction, deletion, explanation of processing activities, restriction of processing where applicable, and withdrawal of consent.

United Arab Emirates

Candidates may exercise rights available under applicable UAE privacy laws.

United States

Candidates located in certain U.S. states may have rights to know what personal information is being processed, request access, request correction, request deletion, and appeal certain privacy-related decisions.

Changes to This Notice

SWM may update this Recruitment Privacy Notice from time to time to reflect changes in legal requirements, regulatory guidance, business practices, recruitment technologies, or organizational processes.

Any updated version will be posted with a revised effective date.