### APPLICANT AND EMPLOYEE PRIVACY NOTICE

### India

To view or request the Privacy Policy in another language, please contact the Legal team at <a href="legal@anthropic.com">legal@anthropic.com</a>. In the event of any discrepancy or conflict between the English version of the Privacy Policy and versions of the Privacy Policy in other languages, the English version will prevail over the other translated versions.

#### 1. Introduction

- 1.1 This privacy notice applies to you if you are based in India, and you are:
  - (a) a current or former executive, employee, intern, contractor, consultant or temporary or agency member of staff engaged by us ("Team Members"); or
  - (b) an applicant or prospective Team Member ("Applicants").
- 1.2 This privacy notice sets out how we process data that identifies or is associated with you ("personal information"), and your rights in relation to that information.
- 1.3 This privacy notice is not part of any contract of employment or other contract between you and us.
- 1.4 It is important that you read and understand this notice. If you have any questions or require further information, please contact the Legal team using the contact details in paragraph 3 of this privacy notice.

### 2. Who Is Responsible For Your Personal Information

- 2.1 The Anthropic group consists of the following entities: Anthropic, PBC, Anthropic Limited, Anthropic Ireland Limited, and Anthropic Switzerland GmbH.
- 2.2 The Anthropic entity that engages you as a Team Member or that you engage with as an Applicant will, together with Anthropic, PBC, be the joint controllers/ fiduciaries of the personal information that we collect and use as set out in this privacy notice. This means that this entity and Anthropic, PBC jointly determine and are responsible for how this personal information is used.
- 2.3 The Anthropic entity that engages you as a Team Member or that you engage with as an Applicant and Anthropic, PBC are, collectively, referred to in this privacy notice as "Anthropic", "we", "our" or "us". We have allocated responsibility for complying with our obligations under applicable data protection law as follows:
  - (a) Information about how we and the entities listed above use your personal data: the Anthropic entity that engages you as a Team Member or that you engage with as an Applicant will provide you with information about how your personal data is used by us as joint controllers/ fiduciaries.
  - (b) Your rights: the Anthropic entity that engages you as a Team Member or that you engage with as an Applicant will serve as the primary contact point for exercising your rights in respect of the personal data we process as joint controllers/ fiduciaries. If you would like to exercise your rights in respect of your personal data that we process jointly, you can do so by contacting us

using the details in paragraph 3 below.

- (c) Security: each of us will maintain our own safeguards to ensure that the personal data we process as joint controllers is kept secure.
- (d) Lawfulness: each of us have determined the lawful basis relied on for processing your personal data as joint controllers/ fiduciaries.
- (e) Transfers: each of us have implemented our own safeguards for the transfers of your personal data we undertake, including transfers to jurisdictions outside India.
- 2.4 Anthropic may also use third-party employers of record and third-party employment agencies to enter into employment contracts with Team Members in certain jurisdictions. If you are employed by a third-party employer of record, or engaged through a third-party employment agency, that employer of record or agency will also be the controller/ fiduciary and responsible for how your personal information is used. You should ensure that you read and understand their privacy notice in addition to this notice, as the way they use your personal information may be different to how Anthropic does.

# 3. Contact Point For Data Protection Queries

Please contact the Legal team at <u>legal@anthropic.com</u> if you have any questions, comments, concerns and requests regarding this notice.

## 4. Personal Information We Collect About Applicants

### Information you provide

4.1 We will collect the following categories of personal information about you in connection with your application for work with us, either from you directly or from the recruitment or employment agency or employer of record that refers your application to us. The types of personal information we collect will vary depending on the nature of the position and role you are applying for:

Personal information	How we use this information	Legal basis for processing
Personal contact and identification details, such as your name, gender, date of birth, phone number, address and e-mail address.	We use this information to open and maintain applicant records.	Consent
address.	We use this information to communicate with you as part of the recruitment process.	Consent

Job application	We use this information	Consent
information, such as	to process and assess	
position applied for, time	your application,	
and date of application,	including assessing your	
educational background	suitability for a role.	
and professional qualifications, skills, current job description, previous roles, responsibilities and	We use this information to calculate proposed salary and assessing eligibility for certain benefits.	Consent
assignments, years of service, reasons for prior termination, and other information contained in your CV and cover letter.	We use this information to monitor and improve our application process.	

		Consent
Nationality, citizenship and right to work information, such as country of birth, government identification documents (including passports and residency permits) and, where relevant, visa information.	We use this information to fulfil our obligations to relevant government authorities, including to determine your eligibility to work.	The processing is necessary for compliance with a n obligation under any law for the time being in force in India to disclose information to any governmental authority in India. For all other cases, consent will be the basis.
Our communications with you, including the content of any communications we may have with you regarding your application.	We use this information to manage the application process.  We use this information to communicate with you as part of the recruitment process.	Consent

4.2 When we collect your personal information, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we will not be able to process your application successfully.

### <u>Information contained in records that we create ourselves</u>

4.3 As part of your application process, we will also create Interview evaluation and appraisal information, such as comments and notes made by interviewers or other Team Members in connection with your application:

Personal information	How we use this information	Legal basis for processing
Interview evaluation and appraisal information, such as comments and notes made by interviewers or other Team Members in connection with	We use this information to process and assess your application, including assessing your suitability for a role.	Consent.
your application.	We use this information to calculate proposed salary and assess eligibility for certain benefits.	
	We use this information to monitor and improve our application process.	

### Pre-employment vetting

4.4 If we decide to offer you employment or engage you as a consultant or contractor, we may also collect verification of your employment history and professional qualifications.

Personal information	How we use this information	Legal basis for processing
Employment history and professional qualification verification. We may contact your professional and academic referees to confirm the employment, professional and academic information that you have provided to us. You should ensure that you have any referees' consent to disclose information about you to us when you submit your application. We will obtain the content of any reference, as well as the results of any reference checks.	We use this information to process and assess your application, including assessing your suitability for a role.	Consent

Results of basic criminal record checks (pass / fail only).	Where relevant for your role, and where permitted under applicable law, we use this information to identify potential risk of unlawful behaviour.	Consent
Results of anti-financial crime compliance searches, such as searches against lists of sanctioned individuals and politically exposed persons.	We use this information to identify and manage our risk and exposure to bribery and corruption, money laundering, tax evasion, facilitation and negative	Consent
	publicity, as well as complying with UK and US government restrictions on contracting with sanctioned individuals.	

4.5 If required by applicable law, we will inform you if we obtain any information through pre- employment screening that could affect our decision to offer you employment or appointment as a consultant, and give you the opportunity to respond to the information obtained. Any responses shared will take your response into account when deciding whether to proceed with your appointment.

# **Sensitive Personal Information**

4.6 In limited circumstances, we may need to process the following special categories of personal information ("sensitive information") about you for specific purposes:

Personal information	How	we	use	this	Legal	basis	for
	inform	ation			processi	ng	

Disability and health records, such as information relating to any disability or health condition that is relevant to an individual's application.	applicable law relation to	Consent
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# 5. Personal Information We Collect About Team Members

# Personal information collected as part of your application

5.1 If your application is successful and you become an employee, consultant or contractor of Anthropic or are engaged as temporary or agency staff by Anthropic, the personal information we collect during the application process may be transferred to your personnel file and stored and used for purposes connected with your employment or engagement by Anthropic as follows:

Personal information	How we use this information	Legal basis for processing
Identity and contact details, such as your name, title, gender, phone number, address, e-mail address, date of birth and photograph.	We use this information to open and maintain human resources records.	The processing is necessary for employment purpose or we obtain appropriate consents.
	We use this information to communicate with Team Members for internal business purposes or emergencies.	
	We use this information to issue payslips and process payroll.	

We use this information to grant you access to our premises and/or internal computer systems. We use this information to maintain an internal directory of Team Members. We use this information in our promotional material, such as blogs websites, and social media pages.

We use this information Nationality, citizenship processing to fulfil our obligations necessary for compliance and right to work to relevant government with a legal obligation information, such as under any law for the country of birth, authorities, including to determine your ongoing time being in force in government identification eligibility to work. documents (including India to disclose passports and residency information to any permits), national governmental authority insurance number in India. For all other social security number cases, consent will be the and, where relevant, visa basis. information. Qualifications and We use this information The processing is experience, to make ongoing salary necessary such as for educational background decisions and decisions employment purpose or and professional relating to eligibility for we obtain appropriate certain benefits. qualifications, skills, consents. previous roles. responsibilities and assignments, years We use this information to service, reasons for prior assess your suitability for termination, and other certain tasks, and to information contained in assess suitability for, and your CV. to process promotions, iob moves and staff restructuring. Depending on your position, we use this information to fulfil obligations to regulators and professional bodies (e.g. demonstrating Team Member suitability).

	We use this information to monitor and allocate human resources.	
Recruitment information, such as role applied for, comments and notes made by interviewers or other Team Members in connection with your	We use this information to monitor and allocate human resources.	The processing is necessary for our employment purpose or we obtain appropriate consents
application.	We use this information to make ongoing salary decisions and decisions relating to eligibility for certain benefits.	
	We use this information to assess your suitability for certain tasks, and to assess suitability for, and to process promotions, job moves and staff restructuring.	

Results of reference checks, such as verification of education and employment history.	We use this information to retain records to evidence the integrity of the application process and compliance with application and vetting procedures.	
Results of criminal background checks (pass / fail only).	We use this information to verify your suitability for certain tasks and suitability for a role, where the nature of the role requires additional background checks.	Where permitted under local law, the processing is necessary for our employment purpose or we obtain appropriate consents .

Results of anti-financial crime compliance searches, such as searches against lists of sanctioned individuals and politically exposed persons.	We use this information to identify and manage our risk and exposure to bribery and corruption, money laundering, tax evasion, facilitation and negative publicity, as well as complying with UK and US government restrictions on contracting with sanctioned individuals.	The processing is necessary for our employment purpose or we obtain appropriate consents.
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# Personal information provided by you when you become a Team Member

5.2 We will also collect the following additional information about you either from you directly or from a third-party employer of record or employment agency in the course of your employment or engagement. When we collect personal information from you, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we may be unable to perform some of our obligations to you or provide you with certain benefits.

Personal information	How we use this information	Legal basis for processing
Payment and tax information, such as your credit card or bank account details, Tax ID number and billing address.	We use this information to pay salaries and other benefits to Team Members.  We use this information to process expenses claims.	The processing is necessary for employment purpose or we obtain appropriate consents .
Information collected in Team Member surveys and exit interviews.	We use this information to monitor, assess and improve our Team Member development and company culture.	The processing is necessary for our employment purpose or we obtain appropriate consents.

# Records containing personal information maintained by us

5.3 We will also create and maintain records relating to your employment or engagement with us as follows as part of our ongoing relationship with you:

Personal information	How we use this information	Legal basis for processing
Current job role information, such as position held, location of role, job description, responsibilities and assignments, years of service, and previous roles at Anthropic.	We use this information to maintain human resources records.	The processing is necessary for our employment purpose or we obtain appropriate consents.
шеттоп орга	We use this information to allocate resources.	
	We use this information to assess, forecast and make business decisions about our human resources.	
	We use this information to determine the tasks and responsibilities assigned to you.	
	We use this information to maintain an internal directory of Team Members.	

	We use this information in our promotional material, such as websites, blogs and social media pages.	Consent.
Benefits information, such as salary details, bonus payments, pension details, share option details, medical and dental insurance, and any salary sacrifice benefits.	to maintain human	The processing is necessary for our employment purpose or we obtain appropriate consents .

	We use this information	
	to allocate resources.	
	We use this information	
	to provide and administer	
	benefits for which you are eligible.	
	are engine.	
	We use this information to	
	assess, forecast and make	
	business decisions in	
	relation to financial and	
	other obligations to Team	
	Members and third parties	
	(such as tax authorities and beneficiaries) in relation to	
	any benefits owed to Team	
	Members.	
	We use this information to	
	process payroll.	
	We use this information	The processing is
	to report to tax	necessary for compliance
	authorities.	with legal obligations
		under any law for the time
		being in force in India to
		disclose information to any governmental authority in
		India.
Darformance	We use this information to	The processing is possesser:
_	appraisals and to assist	= -
of courses and training	with career planning and	appropriate consents.
undertaken, performance	skills monitoring.	
reviews and assessments.		
	with career planning and	1 1

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	We use this information to make ongoing salary decisions and decisions relating to eligibility for certain benefits.	
Disciplinary, capability and conduct records, such as details of warnings, details of grievances submitted by and in relation to the individual and other records relating to conduct.	We use this information to assess suitability for certain tasks, and to process promotions, job moves and staff restructuring.  We use this information to provide references for future applications.  We use this information to disciplinary, capability, grievance and conduct issues.  We use this information to maintain employment records, monitor and improve our human resources procedures and processes.	The processing is necessary for the employment purpose or we obtain appropriate consents.
	We use this information to comply with legal obligations to which we may be subject.	The processing is necessary to comply with a legal obligation under any law for the time being in force in India to disclose information to any governmental authority in India. For all other cases, consent will be the basis.
Absence records, such as leave requests and approvals, and dates and time away from the office	We use this information to make corresponding decisions relating to human resource	The processing is necessary for our employment purpose or we obtain appropriate

allocation, and to address

any other issues that may arise from absences.

consents.

on leave.

Health and safety records, including information relating to health and safety in the workplace, accidents and near misses.	We use this information to address legal obligations to Team Members in relation to health and safety in the workplace.	The processing is necessary to comply with a legal obligation under any law for the time being in force in India to disclose information to any governmental authority in India. For all other cases, consent will be the basis.
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# <u>Information about IT use and physical access to premises</u>

To ensure the security of our premises and our IT systems, we collect the following information about your access and use of our premises, IT systems and IT equipment. We may also access and review this information in connection with internal investigations.

Personal information	How we use this information	Legal basis for processing
Access logs and CCTV recordings, including systems which reflect the date, times of Team Members' attendance at Anthropic premises.	We use this information to monitor access to our premises for security purposes.	The processing is necessary for our employment purpose, or we obtain appropriate consents.
	In the event of an internal investigation, such as in response to a complaint filed by or against you, we may access this information to the extent relevant to the nature of the incident and required to establish facts relating to the incident.	
Any other data provided by the Team Member that is stored on Anthropic's equipment and computer systems, including electronic communications, information relating to use of the computer systems, documents stored on	We use this information to monitor compliance with internal rules, policies and employment conditions.	The processing is necessary for our employment purpose, or we obtain appropriate consents.

company hardware.	We use this information to investigate security breaches and misuse of computer equipment and systems, and to maintain and back-up records in accordance with back-up and disaster recovery plans.	
	In the event of an internal investigation, such as in response to a complaint filed by or against you, we may access this information to the extent relevant to the nature of the incident and required to establish facts relating to the incident.	
Data contained in or relating to Team Members' communications and use of Anthropic equipment, such as	We use this information to identify and investigate security breaches and misuse of computer equipment and	The processing is necessary for our employment purpose and for prevention of loss and liability.
registration and login times and dates, internet domain names visited using Anthropic's IT equipment, software used, email traffic, log data, account status and other equipment use metrics.	systems. We also use this information to monitor access to systems and data for security purposes.  In the event of an internal investigation, such as in response to a complaint filed by or against you, we may access this information to the extent relevant to the nature of the incident and required to establish facts relating to the incident.	

# Personal information we collect about persons connected to you

5.5 At times, we may collect and process the following personal information about your family members, dependants, beneficiaries, and other people related or connected to you ("Related Persons") in connection with administering emergency contacts and other benefits and services (including governmental tax and social benefits) to which your Related Persons may be entitled. We may collect this information from you or through service providers and other third parties that collect it on our behalf. When you provide information about these Related Persons to us, you should ensure that you give them a copy of this privacy notice.

Personal information	How we use this	Legal basis for
	information	processing
Details of partners, dependants, beneficiaries.	We use this information to process benefits (including governmental tax and social benefits) to which Team Members' partners, dependants or other beneficiaries may be entitled.	The processing is necessary for the employment purpose or for responding to medical emergency or we obtain appropriate consents.
Next of kin	We use this information to contact the designated contacts in the case of an emergency or as in-death- beneficiaries.	

5.6 Where permitted under local law, we may also use the personal information we collect for external purposes, such as promoting our business or compliance with law enforcement. This processing is usually necessary for our legitimate interests, the legitimate interests of external agencies and for compliance with our legal obligations.

## 6. Sensitive Personal Information

6.1 In limited circumstances, we may need to process the following special categories of personal information ("sensitive information") about you for specific purposes:

Personal information	How we use this information	Legal basis for processing
Disability and health records, such as information relating to any disability or health condition that is relevant to an individual's job role.	We use this information to address legal obligations to Team Members, under applicable law relation to equality and non-discrimination, including making reasonable adjustments to enable or assist Team Members to perform their role.  Switzerland: We use this information to process and assess your application, including assessing your suitability for a role.	Consent

Records of absences due	We use this information to	Consent
to medical or family	manage and carry out our	
reasons, such as	processes and your	
illnesses and	entitlements in respect of	
paternity/maternity	illnesses, accidents and	
leave.	absences, including (as	
	applicable) to meet	
	statutory requirements.	

#### 7. Consent

- 7.1 We are required to obtain your consent for most of the processing activities that we undertake in respect of your personal information.
- 7.2 If we need your consent, we will notify you separately of the personal information we intend to use and how we intend to use it.

You will never be obliged to give us this consent. Where you have given us consent to collect, use or disclose your personal information in a certain way, you may withdraw your consent at any time. If you wish to withdraw any consent that you have given us, please contact the Legal team using the contact details in paragraph 3 of this privacy notice.

## 8. Keeping Your Information Up To Date

As your circumstances change, please inform us of any changes to your personal information so that we can ensure that the personal information we store about you is accurate and up to date.

### 9. How Long We Keep Your Personal Information

9.1 Unless a longer retention period is required or permitted by law, we will only hold your personal information for the following periods:

Personal information	How long we keep it
Information you provide as an applicant or that we generate about you ourselves in connection with your application, as set out in paragraphs 4.1 and 4.3	If your application is unsuccessful, or if you withdrew your application, we will keep this information for 12 months from the date you or we informed the other of their decision not to proceed with your application.
	If your application is successful, we will keep this information for the duration of your employment or engagement to the extent it is relevant to your ongoing employment or engagement with us.

Information collected through	
pre- employment vetting, as set out in paragraph 4.4	We will generally only retain the results of the pre- employment vetting we have carried out (i.e. whether you have passed the relevant checks). If your application is unsuccessful, or if you withdrew your application, we will keep this information for 12 months from the date you or we informed the other of their decision not to proceed with your application.
	If your application is successful, we will keep this information for the duration of your employment or engagement to the extent it is relevant to your ongoing employment or engagement with us.
	If we obtain any information through preemployment screening that could affect our decision to offer you employment or appointment as a consultant, we will retain this information (together with any representations you make to us) until we make a decision as to whether to proceed with offering you a position at Anthropic.
Information you provide us as an applicant about your disability and health as set out in paragraph 4.6	If your application is unsuccessful, or if you withdrew your application, we will keep this information for 12 months from the date you or we informed the other of their decision not to proceed with your application.
	If your application is successful, we will keep this information for the duration of your employment or engagement to the extent it is relevant to your ongoing employment or engagement with us.

Payroll, payment, tax and salary records	For the duration of your employment or engagement with Anthropic, and for 7 years after this employment or engagement ends.
Pension contribution records	For the duration of your employment or engagement with Anthropic, and for 7 years after this employment or engagement ends.
Records of other benefits	For the duration of your employment or engagement with Anthropic, and for 7 years after this employment or engagement ends.
Records relating to accidents, death or injury in connection with work	6 years from the date of the report or termination of your employment or engagement (whichever is later).

Records relating to long-term absence (maternity / paternity leave, long term illness)	3 years after the end of the tax year in which the leave period ends.
Information about your nationality and right to work	For the duration of your employment or engagement with Anthropic, and for 2 years after this employment or engagement ends.
Next of kin	
	For the duration of your employment or engagement with Anthropic.
Disability and health data	
	For the duration of your employment or engagement with Anthropic.
CCTV Records	90 days
Access logs	8 months
Information about your access to our premises and IT systems	For the duration of your employment or engagement with Anthropic.
Information stored by Team Members on company equipment and computer systems and contained in communications	For the duration of your employment or engagement with Anthropic.
All other information and records relating to your employment or engagement by us	For the duration of your employment or engagement with Anthropic, and for 7 years after this employment or engagement ends.

# 10. Recipients of Personal Information

10.1 We may share your personal information with the following:

Recipient	How they use it
Service providers: we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing mailing or email services, data hosting and record keeping services, and payments processing. Such information may be disclosed to providers of:	These recipients will generally use your personal information as processors only on our instructions.  They may also aggregate and anonymise information to monitor the performance of, identify errors in, and improve their services. The lawful basis relied on for such transfers is that the processing is necessary for the relevant service provider's legitimate interests, namely to maintain and improve their services.

- human resources management software and business collaboration tools;
- our IT infrastructure and storage; and
- salary and benefits payments processing.

Our affiliates: Your personal information may be stored and processed on centralised IT systems that are used by companies that own us or are under the same ownership as us in connection with us.

Our affiliates may access your personal information for centralised HR resource planning and management and to facilitate communication and coordination between group entities.

The lawful basis we rely on for sharing your personal information in this way is that it is necessary for our and our affiliates' legitimate interests, namely provision of intragroup services, coordination and resource management.

Advisors: we may share your personal information with our advisors in connection with obtaining professional services such as legal, financial and accountancy services on behalf of Anthropic.

These recipients will use your personal information in order to provide us with legal or financial, accountancy or tax advice.

The lawful basis we rely on for such transfers is that the processing is necessary for our legitimate interests, namely obtaining professional services and advice.

Employers of record and agencies: If you are employed by a third-party employer of record, or engaged through a third- party employment agency, we may share your personal data with them for the purposes of administering your employment.

These recipients will use your personal information in accordance with the privacy notices they have provided to you.

The lawful basis we rely on for such transfers is that the processing is necessary for our and the relevant third-party agency's legitimate interests, namely managing our contractual relationship and our respective relationships with you.

Purchasers and third parties in connection with a business transaction: your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.

These recipients will use your personal information to assess the potential transaction with us. They may also use your personal information to facilitate the integration of our Team Members into their structure in the event of an acquisition.

The lawful basis we rely on for such transfers is that the processing is necessary for our and the third party's legitimate interests, namely assessing and executing a potential transaction with us.

Third parties at your request: we may disclose your personal information where you ask us to, such as banks or mortgage providers, insurance and other benefit providers, or other employers if you ask us for a reference from us when you apply for another position.

These recipients will use your personal information as disclosed in their privacy notice.

We will only share your personal information in this way to the extent you give us your consent to do so.

Third parties, as necessary in connection with your job role: we may disclose certain personal information, such as your name and contact details, to third parties who may need to contact you in connection with your role at Anthropic.

These recipients will use your personal information to communicate with you in connection with our relationship or prospective relationship with them.

The lawful basis we rely on for such transfers is that the processing is necessary for our and the third party's legitimate interests, namely managing our contractual or other relationship or prospective relationship.

Law enforcement, government bodies, regulators and other parties for legal reasons: we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to

- These recipients will use your personal information in the performance of their regulatory or law enforcement role, or to advise us in connection with a potential claim or regulatory enforcement action.
- (i) comply with the law and/or reasonable requests of law enforcement:
- The lawful basis we rely on for sharing personal information with these recipients is that the processing is either necessary to comply with a legal obligation to which we are subject or is necessary for our legitimate interests, namely enforcing our rights or complying with requests from regulatory authorities.

(ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or safety of Anthropic, our Team Members or others.

### 11. Storing And Transferring Your Personal Information

- 11.1 Security. We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on secure servers. Where we transfer personal information to our service providers, we will ensure that the recipients also implement appropriate technical and organisational security measures to protect your personal information.
- 11.2 International Transfers of your Personal Information. The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third-party service providers have operations. We will ensure that these international transfers of your personal information are made pursuant to appropriate safeguards, such as:
  - (a) ensuring that the personal information is only transferred to countries recognised as offering an equivalent level of protection as compared to the level of protection in the country you are located ("Adequacy"); or

- (b) the transfer is made pursuant to agreements incorporating standard data protection clauses adopted by the European Commission and approved under the UK Data Protection Act 2018 ("SCCs").
- 11.3 Your personal information may be processed by recipients in the following countries:

Destination Country USA	Safeguard used Standard Contractual Clauses
UK	Adequacy (EU)
EU	Adequacy (UK)

11.4 If you wish to enquire further about the safeguards we use, including obtaining a copy of any SCCs that we have entered into, please contact the Legal team using the contact details in paragraph 3 of this privacy notice.

# 12. Your Rights in Respect of Your Personal Information

- 12.1 In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:
  - (a) Right of access. You have the right to obtain:
    - (i) confirmation of whether, and where, we are processing your personal information;
    - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
    - (iii) information about the categories of recipients with whom we may share your personal information including the identities of all other data fiduciaries and data processors with whom the personal data has been shared along with the description of the personal data as shared; and
    - (iv) a copy of the personal information we hold about you.
  - (b) Right of portability. You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
  - (c) Right to rectification. You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
  - (d) Right to nominate: You have the right to nominate any other individual who can exercise your rights in the event of your death or incapacity.
  - (e) Right to withdraw consent: Where you have provided your consent to the collection, processing, and/or transfer of your personal data, you have the

- right to withdraw your consent. If you decide to withdraw your consent, we will stop processing your personal data for that purpose unless we identify an alternative legal basis.
- (f) Right to erasure. You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (g) Right to restriction. You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- 12.2 Right to object. You also have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.
- 12.3 If you wish to exercise one of these rights, please contact the Legal team, using the contact details at paragraph 3 of this privacy notice.
- 12.4 We will not charge you a fee for complying with your request to exercise one of these rights, other than where the request is manifestly unfounded or excessive (such as if you submit a number of repeated requests), in which case we may charge you a reasonable fee to cover our administrative costs.
- 12.5 You also have the right to lodge a complaint to your local data protection supervisory authority. For more information, please contact your local data protection authority.

### 13. Changes To This Notice

- 13.1 We may update this notice from time to time. When we change this notice in a material way, we will update the "last modified" date below. Please visit the Legal team's Outline page or contact Legal@anthropic.com to obtain a current copy of this privacy notice.
- 13.2 This notice was last modified on October 16, 2025.