

CANDIDATE PRIVACY NOTICE

Last Updated: December 1, 2024

The private limited company «PersonalInvest OÜ» ("we," "us," "our") is committed to protecting the privacy and security of your personal information. This Candidate Privacy Notice explains how we collect, use, and disclose your personal data during the recruitment process. For more detailed information about our general privacy practices, please refer to our Privacy Policy.

We are subject to applicable data protection legislation including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR") and we are the data controller unless otherwise stated.

Registered address: Katusepapi tn 6 11412 Lasnamäe linnaosa, Tallinn Harju maakond Estonia

Email address: elena@personalinvest.org

2. PERSONAL DATA WE COLLECT

We may collect and process the following categories of your personal data:

- Identification Information: name, date of birth;
- Contact Information: location, phone number, and email address;
- Professional Information: CV/resume, work experience, education, skills, and qualifications and languages spoken;
- References: contact details of references provided by you;
- Application Information: cover letter, application forms, and interview notes;
- Background Checks: verification of qualifications, recommendations from previous employers;
- Digital Presence: Social media profiles and professional network profiles (e.g., LinkedIn);
- Citizenship and Legalization Status;
- Start date or availability date;
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website or from links clicked on in emails from us;
- In certain circumstances, video recordings of your participating in the interviews where you have consented to the recording.
- Any other information you provide during the recruitment process.

There are "special categories" of more sensitive personal data which require a higher level of protection. We do not routinely collect, store or use any special categories of personal data as part of our recruitment activities. We may process sensitive personal data and share it with Customers only with your explicit consent and where this is contractually required or the Customer specifically requests such information to enable them to comply with their own employment processes.

3. HOW WE USE YOUR PERSONAL DATA

We use your personal data for the following purposes:

- Recruitment Process: Evaluating your skills, qualifications, and suitability for the role.
- Communication: Contacting you regarding the recruitment process, including scheduling interviews and providing updates.

- Compliance: Complying with legal and regulatory requirements.
- Record-Keeping: Maintaining records related to our hiring processes.

4. LEGAL BASIS FOR PROCESSING

We process your personal data based on the following legal grounds:

- Contractual Necessity: To take steps at your request prior to entering into a contract.
- Legal Obligation: To comply with our legal obligations.
- Legitimate Interests: To manage our recruitment process and improve our hiring practices.
- Consent: To process sensitive personal data and share it with Customers, your consent to retain your data, only if you expressly agree, to record online video or audio, meetings, interviews or assessments, to contact you with news about jobs as part of our recruitment campaigns, if you have opted in.

5. DATA SHARING

We may share and disclose your personal information with approved partners acting on our behalf, or approved partners acting also on their own behalf.

We may share your personal data with third party service providers who assist us in carrying out our business activities. These third parties act as our data processors and are bound by strict contractual provisions to only process your personal data under our instructions and for the limited purposes we permit them. These third parties include (but are not limited to) background check companies, IT service providers, payroll processors; external professional advisors such as lawyers, accountants, and auditors to obtain professional services that assist us in the provision of our services.

We may also share your personal data with courts, tribunals, regulators and other governmental and public authorities (such as the police or tax authorities) to: (i) allow us to pursue legal remedies, (ii) to enforce our terms and conditions and protect our operations, (iii) to comply with legal process, (iv) to comply with applicable law, and (v) to respond to requests from public and governmental bodies.

6. DATA SECURITY

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. These include measures to deal with any suspected data breach. We employ appropriate technical, organisational and industry-standard security measures, including encryption and access controls, to safeguard your data.

7. DATA RETENTION

We will keep your personal data on our database for a period of up to two years from the point that we collect such personal data or subsequently have meaningful contact with you (or, where appropriate, the company you are working for or with). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected. We may keep your personal data on our database for a longer period than this if we believe in good faith that we need to do so, for example, because of our obligations to tax authorities or in connection with any anticipated litigation.

We have asked you to consent to us storing your personal data after that initial period for potential suitable positions or if you have opted in to receive any information generally about our recruitment campaigns.

If we do not hear from you, we will either delete your profile or archive your profile and create a dummy profile with only one data field (such as your email address) to help link any future applications.

You may withdraw your consent to retaining your personal data beyond the initial period after an application at any time.

If you do not consent to the retention of your data as set out here or you withdraw your consent, after 2 years of no activity we will take reasonable steps to either delete your profile or archive your profile and create a dummy profile with only one data field (such as your email address) to help link any future applications. This will not affect your ability to receive information on our recruitment campaigns.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

8. YOUR DATA PROTECTION RIGHTS

You have the following rights regarding your personal data:

- **Access:** You have the right to request access to your personal data and to ask us whether we collect or use any of your personal data. If so, you can receive a copy of that data. Reasonable access to your personal data will be provided at no cost, unless requests are manifestly unfounded or excessive.
- **Rectification:** You have the right to request the correction of inaccurate or incomplete data. Upon request, we will correct inaccurate personal data about you and, considering the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.
- **Erasure (Right to be Forgotten):** You have the right to request the deletion or removal of your personal information where there is no longer a good reason for us to continue processing it. This right also applies where you have exercised your right to object to processing.
- **Restriction of Processing:** You have the right to request the restriction of processing of your personal data. This means that we will suspend the processing of your data under certain circumstances, such as when the accuracy of your personal data is contested and we need some time to verify its accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.
- **Objection:** You have the right to object to the processing of your personal data. This includes the right to object where we are processing your personal information for direct marketing purposes, such as our recruitment campaigns or “hot jobs” emails.
- **Data Portability:** You have the right to request the transfer of your personal data to another party. This right applies only to personal data that you have provided to us, which we process based on your consent or for the performance of a contract, and where the processing is carried out by automated means.
- **Withdraw Consent:** You have the right to withdraw your consent at any time where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you

withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise any of these rights, please contact us at amaurya@personalinvest.org.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

9. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time. Any changes will be posted on this page, and where appropriate, notified to you by email.

10. CONTACT US

If you have any queries or questions about our data practices, please contact us at: amaurya@personalinvest.org

For more detailed information about our general privacy practices, please refer to our Privacy Policy.