#### HR PERSONAL DATA PROTECTION POLICY

Updated: November 20, 2020

Preply, Inc. and its affiliates ("**Preply**") respect your privacy. We have prepared this HR Personal Data Protection Policy ("**Policy**") in compliance with our General Data Protection Regulation ("**GDPR**") commitments. The Policy explains what Preply does with Personal Data of those individuals, whose Data are collected and processed based on their applications to Preply, either for employment or other contractual relations with Preply.

This Policy equally applies towards the Personal Data of the following Data subjects:

- Data subjects, who submit (submitted) their Personal Data for the vacant positions in Preply directly to Preply or through different services ("Applicants"). This shall equally apply to those Applicants who were refused due to the compelling reasons, but who consented for further Personal Data processing ("Applicants") concerning Personal Data voluntarily provided during application, and
- Data subjects who have employment ("**Employees**") or other contractual relations with

Preply ("**Contractors**"), including those with whom Preply terminated its cooperation, but who agreed to further Personal Data processing, concerning Personal Data voluntarily provided during application, Personal Data provided for the purposes of performing legal obligations or collected pursuant to Preply's legitimate interests.

### 1. What is Personal Data and what is processing of Personal Data?

Personal Data ("**Data**") is any information relating to you and that alone or in combination with other pieces of information gives the opportunity to a person that collects and processes such information to identify you as an individual.

There are also specific categories of Data called sensitive. Whereas Preply does not require the respective Data from the Applicants, it remains solely your responsibility if you add to your application the following Personal Data:

- racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,
- health.
- sex life or sexual orientation; and
- genetic and biometric Data.

At the same time, **processing** of the information means any action with your Personal Data, for example, collection, recording, organizing, structuring, storage, use, disclosure by any means and so on.

### 2. What is a legal basis of Preply for processing?

Preply will process your Personal Data only when we have lawful bases. Specifically, Preply processes your Personal Data in the following cases.

## (1) Applicants

Preply collects and processes Personal Data of the Applicants pursuant to:

- consent freely given in course of Preply's recruitment. Please, note that you are under no statutory or contractual obligation to provide Data to Preply during the recruitment process. However, if you do not provide the information, Preply may not be able to process your application properly or at all;
- Preply's legitimate interests, including those identified by Data protection laws or necessary for one's vital interests. Preply's legitimate interests shall also cover recruitment process management, assessment and confirmation of Applicants' suitability for the vacant positions and decision-making to whom offer a position. Legitimate interests shall also cover the transmission of Personal Data for internal HR purposes within Preply's affiliates, employees and contractors. Please, note that the achievement of the aforementioned legitimate purposes is in the best interests of your application. At the same time, in the absence of your Personal Data, Preply will not be able to foster the recruitment process. From our turn and if such Data is provided, Preply will collect and process the least Personal Data possible to achieve the legitimate aims. Without the limitation to the foregoing, you have the right to object to such processing;
- legal obligations that Preply shall perform, including those necessary to carry out background checks as to the Applicants' eligibility to be employed or to work under a contract.

### (2) If Your Application Was Not Successful

If your application is not successful, Preply will keep your Personal Data on file in case there are future job opportunities for which you may be suited. Concerning this specific situation, Preply generally asks the Applicants for a consent before it keeps Personal Data for such purposes and the Applicants are free to withdraw such consent at any time by contacting us at talent@preply.com. Without limitation to the foregoing, Preply may additionally invoke its legitimate interests to process Personal Data under such circumstances, but only to the extent the respective collection and processing of your Personal Data does not violate your interests or fundamental rights and freedoms.

# (3) Employees and Contractors

Preply collects and processes Personal Data of the Employees and Contractors pursuant to:

- consent freely given to this Policy concerning the legitimate purposes defined herein which may be withdrawn at any time, unless processing is required to comply with Preply's obligations, or required for the purposes of contract performance, or justified by the Preply's legitimate interests;
- contractual relations between Preply and you. Such processing may be necessary in order to enter into a contract with you and in order to perform the contractual obligations. This equally applies to employer/employee relations and contractor relations under services or similar civil contracts;
- processing is necessary in order to comply with the specific legal obligations, of which Preply will notify you in advance;
- processing is necessary for the Preply's legitimate interests, including, for example, those prescribed by the Data protection laws, those necessary to protect your vital interests or vital interests of another natural person; or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. In particular, legitimate interests shall cover the need to process payments to employees and contractors, monitor the efficiency and productivity of employees and contractors, carry out organizational and management activity within Preply. In this case, you have the right to object to such processing.

## (4) Former Employees and Contractors

After resignation or other similar form of our relations termination, Preply will enable you to opt-out from your Personal Data processing. On a condition you consent for further processing, Preply may still retain access to the Personal Data previously submitted by you (contained in CV) in order to, in particular, for employment law purposes and tax compliance, and provide you with our future job opportunities.

#### 3. Data We Collect: scope

Preply collects a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number:
- Date of birth;
- Photo:
- Details of your qualifications, skills, experience and employment history;
- Other Personal Data voluntarily provided by you or information requested by us in order to comply with legal obligation or for the Preply's legitimate interests' purposes. Preply will collect your Personal Data through the CVs, resume and cover letters submitted by you. Your Personal Data will be compiled into a "virtual resume/CV" and stored on the online service defined below. In addition, Preply may extract the Personal Data from your passport or other identity documents obtained from you as well as

through interviews or other forms of assessment.

As a rule, Preply does not either collect or process any sensitive Data, unless you expressly submitted them via your CV/resume or similar document. However, concerning Employees, it may be required under the law to collect and process Data on criminal convictions and offences as well as concerning their health. Please, note that when Preply faces any need to collect and process such Data, we will additionally and separately inform you of that.

# 4. Data We Collect: purposes

## (1) Applicants

Preply will use your Personal Data to assess your qualifications for roles for which you apply. As an Applicant, your Data will be available to appropriate individuals involved in the selection and assessment of Applicants and the storage and processing of Applicants' Data. These personnel include HR representatives and hiring managers, business personnel involved in evaluating Applicants for consideration.

We do not share, sell, or lease Personal Data about Applicants with any third parties for their marketing use. Preply will not use or share Personal Data of Applicants except as described in this HR Personal Data Protection Policy.

### (2) If Your Application Wasn't Approved

On a condition you consented to further processing or when there is a legal obligation we need to comply with or when we have legitimate interests, Preply will use the Personal Data to provide you with our future job opportunities.

#### (3) Employees and Contractors

Personal Data submitted in the course of successful application will be stored in order to record the competencies, qualifications and other Data concerning Employees and Contractors, and, generally, for the purposes of performance of the respective agreements.

### (4) Former Employees and Contractors

On a condition you consented to further processing or when there is a legal obligation we need to comply with or when we have legitimate interests, Preply will use the Personal Data for employment law purposes and tax compliance, and to provide you with our future job opportunities.

#### 5. How do we Share Information?

Your information will be shared internally for the recruitment purposes. This includes members of the HR and recruitment team of Preply, interviewers involved in the recruitment process,

managers in the business area with a vacancy and IT staff, if access to the Data is necessary for the performance of their roles.

We also use some HR management services to collect, manage, analyze or otherwise process your Data:

- Lever Inc: use of this service applies specifically to processing of HR-related Data acquired through submitting of applications for the positions in Preply. Lever Inc. stores Data in the United States. We use the service of Lever Inc. and other below-listed services to manage your application Data and optimize communication with you.
- We use other services, including, but not limited to LinkedIn.com, Jooble.com, Glassdoor.com, Neuvoo.com.ua, Facebook.com, Indeed.com for the HR management purposes and in order to further redirect the information to the HR and recruitment team of Preply.

Your Data may be transferred outside the European Economic Area (EEA), e.g. to the United States, to facilitate our recruitment process and only within the affiliates, employees and contractors of Preply. Data is transferred outside the EEA on the basis of respective legally binding safeguards incorporated into documents with such persons. This is achieved by using only certified services and products, signing agreements on protection of Personal Data with contractors and partners (including the Standard Data Protection Contractual Clauses Adopted by the European Commission and compliant with the EU Data protection laws), as well as taking technical measures to ensure the information is protected when stored, used and while being processed and transferred. By ticking the respective box when providing us your Personal Data you agree to such transfer and processing within the purposes set in this HR Personal Data Protection Policy.

### 6. How long do we store Personal Data?

### (1) Applicants

Your Personal Data will be processed and stored during the whole recruitment process (as well as employment or contractual relations in case your application is satisfied), and for 12 months thereafter, and at the end of that period it will be deleted or anonymised.

#### (2) If your application is not satisfied

If your application for employment is unsuccessful, Preply will enable you to expressly opt-out regarding such processing in the respective email you receive from us.

If you do not opt-out, we will hold your Data on file for a further 12 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your Data is deleted or anonymised.

### (3) Employees and Contractors

If your application for job vacancy is successful, Personal Data gathered during the recruitment process will be transferred to your personnel file and retained during your employment or any other contractual relations with Preply.

Such Data is stored in the course of the existence of contractual relations between the parties and for the purposes of compliance with our obligations. Generally, the Data is stored as long as the contract with Preply is in existence. However, please, note that some Data, that is covered by the contractual severability and survival clauses, and employment law purposes and tax compliance, may be additionally processed after the termination or expiration of the respective contracts.

# (4) Former Employees and Contractors

After the termination of our cooperation, Preply will enable you to expressly opt-out regarding such processing.

If you do not opt-out, we will hold your Data on file for a further 36 months for employment law purposes and tax compliance, and for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your Data will be deleted or anonymised.

### 7. Your rights regarding your Personal Data Preply collects and processes:

With regard to the Data we collect and process about you, you have a right:

- to access to your Personal Data processed by Preply and right to Data portability; in other words, ask for the list of Personal Data currently processed and respective purposes;
- to request from Preply to rectify your Personal Data requiring corrections;
- to request from Preply to erase Personal Data as long as their processing is no longer necessary for why it was actually collected. The same should happen if we do not have legal grounds for the processing any more. In most cases Preply will erase it unless otherwise required by legislation;
- to restrict the processing of your Personal Data by Preply. For example, you could contest the accuracy of your Personal Data or in case Preply is not interested in processing of your Personal Data any longer, but you want Preply to do this for different reasons, for example, to bring some claim for somebody and, instead of the erasure of information, its processing will be just restricted.
- to withdraw your consent at any time by contacting us. After we at Preply receive such withdrawal request from you, we will process it in a timely manner and we will no longer process your Personal Data, unless otherwise is set by law;
- to object to processing of your Personal Data by Preply when the processing is related to the performance of our task carried in the public interest or in the exercise of official authority vested

in us. The other case is if we process your Data for the purposes of the legitimate interests pursued by us or by a third party and you believe that such interests are overridden by your interests or fundamental rights and freedoms. If you make a request with objection to processing, we will no longer process the Personal Data unless we are able to demonstrate compelling legitimate grounds for the processing.

Please, note that when the processing of your Personal Data is carried for direct marketing purposes, you have the right to object at any time to such processing without providing any justification and we will no longer process your Data with such direct marketing purposes.

Any requests to exercise your rights can be directed to Preply through the contact details provided below. These requests are free of charge.

### 8. Other Privacy Commitments

### (1) Cross-border transfers

We collect and process your Personal Data both within the United States and outside the United States. Although countries where we process Data may have different laws, we take measures to ensure high privacy compliance (namely, as provided in Section 5 of this Policy).

## (2) Time for reply and reaction

Preply will provide information on action taken on your request related to your rights specified above within one month of receipt of the request for the longest. That period may be extended by two further months if Preply is overwhelmed by the number of requests or the request at issue is complicated and requires a lot of action. Preply will inform you of any such extension within one month of receipt of the request, together with the reasons of such delay.

If you have doubts as to our reply or reaction, or absence of such, you have the right to lodge a complaint with a supervisory authority that is empowered to process such complaints in your country.

#### (3) Security

Preply uses technical and organizational measures to ensure the information is processed in a manner that ensures appropriate security of information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. For example, Preply uses verified contractors that might have access to the Data with which the relevant data processing agreements are signed.

#### (4) Breach notifications

If any Personal Data of yours would be under the breach, we would inform you and the respective Data protection agencies as to the accidents without undue delay, if there are high

risks of violation of your rights as a data subject. We would also do our best to minimize any such risks.

# (5) California Privacy Rights

In case you are a resident of California, the California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Data by Preply, Inc. or its subsidiaries to a third party for the third party's direct marketing purposes. This right granted to California residents applies only to their activities within the State of California. To make such a request, please send an email to <a href="mailto:legal@preply.com">legal@preply.com</a>.

We hope this Policy helped you to understand how your Personal Data will be dealt here at Preply. Do not be afraid – we will take care of it, so you would not be concerned over your privacy. Should you have anything to tell us, e-mail us at support@preply.com We will be happy to receive any information or comment from you to make Preply a better place for work.

### Your Preply team

Contact information: talent@preply.com