

Applicant and Candidate Privacy Notice

Version Date: September 6, 2022

Introduction

This Applicant and Candidate Privacy Notice (the "Notice") provides information about how Precisely Holdings, LLC and its subsidiaries and affiliates ("Precisely", "Company" or "we") collect, use, store, share, or otherwise process information that identifies you ("Personal Data") about job applicants and/or candidates (collectively, "you"). We take our privacy and data protection obligations seriously and we are committed to protecting Personal Data about you. Please read this Notice to understand your rights and how and why we process Personal Data about you.

This Notice does not form part of your application or any future contract of employment and may be updated at any time. A revised Notice will be posted if we make updates.

Collection of Personal Data

The categories of Personal Data that we collect and process about you may include but are not limited to:

- **Identification:** Name and home contact details (email, phone numbers, physical address).
- **Automatically collected data:** We, and service providers working on our behalf, may collect information from you when you use the Company websites that may, alone or in combination with other information, constitute Personal Data.
- **Documentation Required under Immigration Laws:** Citizenship and passport data, details of residency or work permit.
- **Remuneration and pay:** Base salary, bonuses, and type of remuneration.
- **Talent Management Information:** Details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications and memberships, foreign languages and other relevant skills, certification, certification expiration dates), current salary, desired salary, employment preferences, information necessary to complete a background check, information relating to references such as names and contact details, willingness to relocate, and driver's license information.
- **Personal Data created about you:** We collect or create Personal Data about you based on our interaction with you as a prospective employee such as interview notes, and electronic communications.
- **Data used in systems and applications:** Information required to access the Company's systems and applications, such as the system username, the local network username, and the electronic content produced by you using the Company's systems.
- **Sensitive Data:** Sensitive Data is a subset of Personal Data and includes, among others, race, ethnic background, marital status, religious affiliation, union membership, and medical/health information. **Sensitive Data is not requested as part of your application to the Company and we specifically ask that you not include Sensitive Data when submitting your CV and other information.**

Precisely has a legal basis for collecting this Personal Data. For further information on Precisely's legal basis for processing Personal Data about you, please see the section entitled Legal Basis and Legitimate Interest for Processing Personal Data about you in this Notice.

Sources of Personal Data

The Personal Data we process about you may come directly from you or from public or third-party sources including:

- In person, online, by telephone, or in written correspondence and forms;
- Third-party websites and mobile applications where you can apply for jobs at the Company;
- Previous employers and employment references;
- Information verification service providers as part of the recruitment process;
- Consumer reporting agencies in connection with background checks;
- Placement agencies and recruiters; and
- Providers of sanctions and "politically exposed persons" screening lists.

How We Use Personal Data About You

We process Personal Data about you for the following purposes:

- **Applicant management:** To manage work activities in particular regarding recruitment, re-hires, providing professional references, workforce analysis and scheduling, reviewing employment decisions, and career and skills development activities;
- **Candidate management:** To conduct background/reference check and identity verification, when applicable;
- **Communications and emergencies:** To facilitate communication with you, review references, and protect IT infrastructure, office equipment and other assets;
- **Commercial operations:** For the operation and management of IT and communication systems, business asset and human resources allocation, the compilation of audit trails and other reporting tools, keeping records of business activities up to date, communications, the management of mergers, acquisitions, sales, reorganizations and integration activities with a prospective buyer; and
- **Legal and Compliance:** To comply with legal and other requirements, the requirements for record keeping and reporting, monitor equal opportunity and diversity and inclusion, the conduct of audits, compliance with government inspections and the response to other requests from the government or other public authorities, the development of rights and remedies, defending litigation, the management of any internal or external complaints or claims, the conduct of investigations and proper compliance with internal policies and procedures.

Legal Basis and Legitimate Interest for Processing Personal Data About You

We will primarily use Personal Data about you in the following circumstances:

- Where we have a legal basis for processing Personal Data about you;
- When necessary for the execution of your employment contract;
- Where it is necessary to ensure compliance with a legal obligation (including, about Sensitive Data, obligations under employment law); and
- We may use Sensitive Data about you, such as health/medical information, to accommodate a disability or illness during the recruitment process, diversity-related Sensitive Data about you (such as race or ethnicity) to comply with legal obligations relating to diversity and anti-discrimination, and criminal conviction data about you only where it is appropriate (given the role for which you are applying) and we are legally able to do so.

We may also process Personal Data about you in the following situations:

- When necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, the Company has a legitimate interest in processing and transferring, at the group level, Personal Data about you for internal business purposes including to manage the centralization of data processing, to design efficient and operational business processes, to enable inter-company teams to collaborate and make business processes more efficient and cost effective;
- Where it is necessary to protect your (or someone else's) vital interests;
- Where it is necessary for us to defend, prosecute or make a claim against you, us, or a third party; and
- In the case of Sensitive Data, where you have made the information public.

There may be more than one purpose that justifies our use of Personal Data about you in any particular circumstance.

We will only use Personal Data about you for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use Personal Data about you for an unrelated purpose, we will notify you and explain the basis which allows us to do so. If you fail to provide certain Personal Data when requested, we may not be able to review your application, or we may be prevented from complying with our legal obligations.

Disclosures of Personal Data

We share Personal Data with the following unaffiliated third parties:

- **Service Providers:** Companies that provide products and services to the Company such as human resources services, IT systems suppliers and support and background check providers, recruiters and head hunters, and hosting service providers;

- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over the Company such as regulatory authorities, public bodies, and judicial bodies, including to meet national security or law enforcement requirements;

Corporate Transactions: Personal Data may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of any or all of our company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by an affiliate or third party, or in the event of a bankruptcy or related or similar proceedings.

Transfer of Personal Data

The Company may transfer Personal Data throughout the world to fulfil the purposes described above. This may include transferring Personal Data to other countries (including countries located outside the European Economic Area (“EEA”)) and/or the United Kingdom that have different data protection regimes and which are not deemed to provide an adequate level of protection for EEA-origin or UK-origin Personal Data. To ensure that Personal Data about you is sufficiently protected when transferred outside the EEA and/or the United Kingdom, the Company has put in place the following measure: a data transfer agreement incorporating the EU Commission Standard Contractual Clauses and the UK Standard Contractual Clauses (collectively the “SCCs”). A copy of the SCCs can be provided upon request.

Data Security

The Company will take appropriate measures to protect Personal Data in accordance with data privacy and security laws and regulations (“Data Protection Laws”), including requiring that service providers take appropriate measures to ensure the confidentiality and security of such data. Access to Personal Data about you within the Company will be limited to those who have a need to know the information for the purposes described in this Notice, and may include personnel in HR, IT, Compliance, Legal, Finance and Accounting. Such personnel will generally have access to your business contact information such as name, desired position, telephone number, postal address, and email address.

The Company has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach of Personal Data about you where we are legally required to do so.

Data Retention

The Company’s retention period for Personal Data is based on business needs and legal requirements. We retain Personal Data for no longer than is necessary for the purposes for which the Personal Data was collected, as described in this Notice, and any other permissible, related purposes. For example, we may retain Personal Data about you to comply with regulatory requirements regarding the retention of such data, or in the event a litigation hold is imposed. When the Personal Data is no longer required, we securely destroy the data.

Data Accuracy

The Company will take reasonable steps to ensure that the Personal Data processed is reliable for its intended use and is accurate and complete for carrying out the purposes described in this Notice. The Company shall, once notified, direct that Personal Data that is inaccurate, with respect to the purposes for which it is processed is erased or rectified without delay.

Automated Decisions

The Company does not foresee that you will be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Consequence of Not Providing Personal Data

If you chose to not provide certain Personal Data when requested, we may not be able to perform the services for which you have contacted us, or the Company may be prevented from complying with our legal obligations (such as

ensuring your health and safety). You may also have to have to provide the Company with Personal Data to exercise your statutory rights. Failure to provide the Personal Data may mean that you are unable to exercise your statutory rights.

Your Rights

You may have the right, in certain circumstances, to object to the processing of Personal Data about you. You also may have the right, in certain circumstances, to access Personal Data about you, to correct inaccurate Personal Data, to have Personal Data about you erased, to restrict the processing of Personal Data about you, to receive the Personal Data you have provided to the Company in a structured, commonly used and machine-readable format for onward transmission, and to object to automated decision-making. If you wish to exercise any of these rights, please contact privacy@precisely.com. Please note that certain Personal Data may be exempt from such access, correction, erasure, restriction, and portability requests in accordance with applicable Data Protection Laws or other laws and regulations.

Unless you are unable to identify yourself, we will provide you with information on the measures taken because of your request made regarding any of the afore-mentioned rights within one (1) month of receipt of your written request. This period may be extended by two (2) months, given the complexity and the number of requests.

Any refusal to respond to your request will be reasoned and notified within one (1) month from receipt of your written request. You may also file a complaint with your local data protection supervisory authority in the country where you reside. Contact information for the EU is provided on the following website: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm. For UK support, please contact the Information Commissioner's Office.

Your Obligations

You are required to keep Personal Data about you up-to-date and inform us of any material changes to Personal Data about you. You further agree to comply with Data Protection Law and Company policies, standards and procedures that are brought to your attention when processing any Personal Data that may be accessed by you in connection with your relationship with the Company. In particular, you will not access or use any Personal Data for purposes other than those related to your work with the Company, and to the extent necessary for the proper performance of this work.

Questions or Complaints

Please contact privacy@precisely.com with any questions or complaints regarding this Notice or the Company's privacy practices.