



CANDIDATE PRIVACY NOTICE - GLOBAL

I. WHO ARE WE

We are **Noventiq** (meaning the legal entity that has posted the vacancy you are applying for, hereinafter referred to as '**Noventiq**'/'**we**'/'**us**'/'**our**') part of **Noventiq Group** (Noventiq Holdings PLC, a company incorporated under the laws of Cayman Islands whose principal office is at PO Box 309, Ugland House, Grand Cayman, KY1 – 1104, Cayman Islands, hereinafter referred to as '**Noventiq Group**').

II. SUMMARY

We, at Noventiq, are committed to ensuring the protection of Personal Data for all data subjects that entrusted us with this data, including yours, our prospective employees.

For this purpose, we have prepared this document, in which we explain who we are, in what capacity we process personal data, what personal data we process, why, how long we keep this information, with whom we are sharing it, how we secure it, what are your rights, how you can exercise these rights.

We encourage you to read this notice carefully to understand how we collect, use, and share your personal data, as well as your rights in relation to your personal data. If you have any questions or concerns about the use of your personal data, please contact us using the contact information provided at the end of this notice.

The Noventiq Group has taken a decision to implement the highest standard of data protection throughout its global operations for consistency, including for this Privacy Notice, unless a local law or regulation is stricter, in which case the most stringent rules apply.

When processing your personal data, we act as a '**Controller**', which is a term used in most of data protection legislations, to describe an organization that determines the purposes and means of processing personal data.

To see the applicable legal bases for the jurisdiction in which we are established, please refer to Annexes 2-5 and identify the relevant country. Under the section titled "Purposes of Processing," you will find information regarding the purposes of the processing, the categories of personal data that may be processed, and the corresponding legal bases as per the Annexes.

We are committed to comply with all applicable privacy laws and regulations applicable to us. In this regard, we have implemented policies and procedures to ensure that your personal data is treated with the highest standards of privacy and security.

In certain circumstances, we process our candidate's data jointly within Noventiq Group, such as when developing and managing human resources planning, policies and strategies.

III. DEFINITIONS

Personal Data represents any information that relates to an identified or identifiable person, such as their name, contact information, employment history, financial information, or any other information that can be used to identify them.

Processing refers to any operation or set of operations that is performed on personal data, whether by automated means or not, such as collection, recording, storage, retrieval, use, disclosure, erasure, or destruction.

Data subject is a living person to whom the personal data relates. Specific to this Privacy Notice, the data subjects are our candidates.

Candidate refers to physical persons applying for a job opening with any Noventiq legal entity.

For any other specific term used in this Privacy Notice, you can consult the definitions available in the Data Protection Policy available [here](#).

We want to assure you that we are committed to collect and process only personal data that is relevant and necessary for a specific purpose. This means that we will only collect the minimum amount of personal data necessary to achieve the purpose for which it is being processed and not process any personal data that is not relevant or necessary for the specific purpose.

IV. SOURCES

We collect the personal data **directly** from you during the job application process **or indirectly** from various sources, including:

Public data sources. For example, personal data that is publicly available and relevant to the recruitment process (e.g., professional networking platforms such as LinkedIn).

Authorities/public institutions or private entities. In certain circumstances, we may collect personal data from third parties, such as government authorities, public institutions, or private entities. For example, we may obtain personal data from background checks specialized companies.

Data generated during the recruitment process. For example, personal data generated by our corporate network, internal processes and systems.

V. PURPOSES OF THE PROCESSING

We process your personal data for the following purposes:

1. Recruitment, sourcing, and selecting employees

We process your personal data to manage our human resources by recruiting and sourcing suitable applicants based on the specific job requirements. To accomplish this, we use various methods, such as testing and interviewing. In some cases, we may also obtain background information about

applicants and conduct pre-occupational exams. Once a candidate is hired, we manage the onboarding process and maintain records to ensure that our legitimate interests are achieved and we comply with the legal and regulatory requirements.

- **Categories of Personal Data processed:** See complete list in Annex 1
- **Legal basis for countries in Annex 2:**
 - our legitimate interest to ensure an adequate and relevant recruiting process for the positions opened in our company and ensure that we have a skilled workforce;
 - in order to take steps prior to entering into a contract;
 - to comply with the legal obligations, where applicable.
- **Legal basis for countries in Annex 3:**
 - in order to take steps prior to entering into a contract;
 - to comply with the legal obligations, where applicable;
 - your consent, for an adequate and relevant recruiting for the positions opened in our company and to ensure that we have a skilled workforce.
- **Legal basis for countries in Annex 4:**
 - to comply with the legal obligations, where applicable;
 - your consent, in order to take steps prior to entering into a contract and for an adequate and relevant recruiting for the positions opened in our company and to ensure that we have a skilled workforce.
- **Legal basis for countries in Annex 5:**
 - your consent, for all the purposes mentioned above.
- **Consequence of not processing** it may not be possible for us to fully evaluate the suitability for the role and therefore to not offer you a job in our company.

2. Analytics and improvement of the recruitment process

We process your personal data to analyse and improve our recruitment process. This involves administering recruitment information systems and creating and managing candidate metrics, training systems to make the recruitment process more efficient.

- **Categories of Personal Data processed:** see complete list in Annex 1
- **Legal basis for countries in Annex 2:**
 - Our legitimate interest to ensure that we have accurate HR information and metrics to support our business operations and provide you with the best possible employment experience;
 - To comply with the legal obligations, where applicable.
- **Legal basis for countries in Annex 3 & 4:**

- to comply with the legal obligations, where applicable.
- your consent, for the processes related to ensuring that we have accurate HR information and metrics to support our business operations and provide you with the best possible employment experience.

Legal basis for countries in Annex 5:

- your consent, for all the purposes mentioned above.
- **Consequence of not processing.** We may not be able to fully manage candidate inquiries and provide accurate records. This may impact the effectiveness of our recruitment processes.

VI. RETENTION PERIOD

We retain your personal data in accordance with our internal policies and procedures, which are designed to ensure compliance with legal and regulatory requirements, as well as to protect the security and confidentiality of personal data. The retention periods for personal data are determined based on the purpose for which the data was collected, and we may retain personal data for various purposes, including fulfilling contractual obligations, complying with legal requirements, or pursuing legitimate business interests. For specific retention periods per purpose, per country, you can find more information [here](#).

VII. WHO WE SHARE INFORMATION ABOUT YOU WITH

We may share personal information about you with:

- Companies in the Noventiq Group on a need-to-know basis, when we use their services or systems, or when we act as joint controllers to achieve common legitimate business interest, based on data processing agreements;
- Our customers, when you communicate with them to provide services or products;
- Companies or consultants engaged to perform services for us or on our behalf, such as: hosting, mail system, systems used to conduct our activities, maintenance services; statistical and analytical services; human resources; archiving services; auditors, lawyers; Law enforcement agencies, government bodies, regulatory organizations, courts or other public authorities if we have to, or are authorized by the law.

We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claim, whether in court proceedings or in an administrative or out-of-court procedure. Also, we may disclose your data in conjunction with any merger, sale or acquisition of a company in the Noventiq Group.

VIII. INTERNATIONAL TRANSFERS

In doing the above, we may need to transfer personal information about you to other companies in Noventiq Group or third parties located (or whose servers may be located) outside of our country. If we send personal data about you to another country, we will make sure that there is a legal basis for such transfer and that your personal data is adequately protected as required by applicable law for example:

- if the international transfer is to a country that is officially recognized as providing adequate level of protection for Personal Data;
- by using standard contractual clauses approved by relevant authorities (e.g. for data transferred outside of EU/EEA, we implement EU Standard Contractual Clauses (more information about these clauses is available [here](#)) to ensure similar level of protection as in EU/EEA; for data transferred outside of Serbia, we implement Standard Contractual Clauses (more information about these clauses is available only in Serbian [here](#)); for data transferred outside of UK, we also implement Standard Contractual Clauses (more information about these clauses is available [here](#)); for data transferred outside of Argentina, Peru and Uruguay, we implement the Ibero-American Data Protection Network Standard Contractual Clauses (more information about these clauses is available only in Spanish [here](#)); for data transferred outside of Moldova, we implement Standard Contractual Clauses (more information about such clauses is available [here](#)); and by requiring the use of other appropriate technical and organizational measures to protect your personal information;
- the international transfer is permitted under a derogation or is otherwise permitted by the law.
- when required by the law, we collect your consent to transfer your personal data outside your country of origin in these instances.

Depending on applicable local laws you may obtain from us further information about specific entities having access to the data. Your data will be transferred to third countries and any subsequent transfers will follow applicable local and regional laws.

We shall take reasonable steps to ensure that any such overseas entities are contractually bound not to use your personal data for any reason other than the purpose they are contracted by us to provide and to adequately safeguard your personal data. These overseas entities will treat your personal data as confidential, in accordance with this Privacy Notice and with all applicable data protection legislation and will process such personal data only for the purposes and within the terms set out herein.

We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claim, whether in court proceedings or in an administrative or out-of-court procedure.

IX. WHAT ARE YOUR RIGHTS?

Right to withdraw your consent. You can contact us at the relevant contact points indicated below.

Right to information and transparency. You have the right to be informed on the manner in which we process your personal data.

Right to access. You have the right to know what if any of your data we process and obtain a copy of it in most cases.

Right to rectification. You have the right to request us to rectify or complete your data, as the case may be, on the basis of an additional statement.

Right to restrict the processing. You can request us to restrict the processing of your personal data in certain cases.

Right to erasure („right to be forgotten“). You have the right to request and obtain the erasure of your personal data in some cases.

Right to data portability. In certain cases, you have the right to receive the personal data that you have provided us in a structured, commonly used and machine-readable format or to request we transfer it to another controller.

Right to oppose the processing. You have the right to object to the processing of your personal data where it is being processed on the basis of legitimate interests. We will carefully consider your request and assess whether there are compelling legitimate grounds for the processing that override your interests, rights, and freedoms.

Right to not be subject to automated decision – making (to profiling). You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly affects you

Right to launch a complaint with the competent data protection authority. Depending on your location the contact data of the competent data protection authority might differ. You can find a comprehensive list of competent data protection authorities [here](#).

You may exercise any of your rights in relation to your personal data by written notice to us, using contact details set out below.

X. HOW DO WE SAFEGUARD YOUR DATA?

We use a range of security measures to protect your personal information, which based on the specific data we process and the risk that the processing activity might pose to your rights and freedoms, might be:

- Measures for ensuring ongoing confidentiality, integrity, availability and resilience of processing systems.
- Measures for ensuring the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.
- Processes for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures in order to ensure the security of the processing.
- Measures for user identification and authorisation.
- Measures for the protection of data during transmission
- Measures for the protection of data during storage.
- Pseudonymisation and/or encryption of personal data.
- Measures for ensuring physical security of locations at which personal data are processed.
- Measures for ensuring events logging.

- Measures for ensuring system configuration, including default configuration.
- Measures for internal IT and IT security governance and management.
- Measures for certification/assurance of processes and products.
- Measures for ensuring data minimisation.
- Measures for ensuring data quality.
- Measures for ensuring limited data retention.
- Measures for ensuring accountability.
- Measures for early detection, management and recovery for incidents.

XI. CONTACT DETAILS

Subject	Email	Address
For personal information collected from candidates INSIDE Europe and MENA , written inquiries to the data protection responsible may be addressed to	Dataprotection.emea@noventiq.com	London 26-28 Hammersmith Grove, London W6 7HA, UK
For personal information collected from candidates INSIDE LATAM , written inquiries to the data protection responsible may be addressed to:	Dataprotection.LATAM@noventiq.com	Buenos Aires Maipú 939, Ciudad Autónoma de Buenos Aires, Argentina, C1006
For personal information collected from candidates INSIDE INDIA , written inquiries to the data protection responsible may be addressed to	Dataprotection.india@noventiq.com	New Delhi (Gurugram) Unit No -515, 5th Floor, MGF Metropolis Mall, MG Road, Gurugram (Gurgaon), 122002, India
For personal information collected from candidates INSIDE APAC , written inquiries to the data protection responsible may be addressed to:	Dataprotection.APAC@noventiq.com	Ho Chi Minh City Viet Dragon Tower, 7th Floor, 141 Nguyen Du Street, Ben Thanh Ward, District 1, Ho Chi Minh City, Vietnam
For personal information collected from candidates INSIDE CIS , written inquiries to the data protection responsible may be addressed to	Dataprotection.CIS@noventiq.com	Kazakhstan, Almaty, Medueskyi district, Dostyk ave., build. #210, BC «Koktem Grand», office 72, 050051

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please report it via the contact points provided in [Speak UP Policy](#).

XII. HOW DO WE KEEP THIS PRIVACY NOTICE UPDATED?

We may update this Privacy Notice from time to time. If we materially change it, we will take steps to inform you of the change.

The date at the bottom of this Privacy Notice shows when it was last updated.

Annex 1

CATEGORIES OF PERSONAL DATA

Category	Example
Identification and Contact Details	Name, Phone number, Email address, Social media or professional profiles (e.g., LinkedIn)
Professional and Educational Information	CV/resume details, Academic qualifications, Certifications and training, Employment history, Skills and competencies, References or recommendation letters
Application-Related Information	Cover letter, Application forms, Desired role or position, Availability for interviews or start dates
Assessment and Selection Information	Results of skills tests or aptitude tests, Interview notes and evaluations
Identification Documentation (if required at an advanced stage)	Copies of identification documents, Proof of work eligibility or visa status
Background Check Data (if applicable, in some jurisdictions)	Criminal records - if lawful and relevant to the role, Credit checks if lawful and relevant to the role, Verification of qualifications and reference
Diversity and Inclusion Data (in some jurisdictions, optional)	Gender, Ethnicity, Disability status or accommodations required, Veteran status
Communication Records	Emails or messages exchanged during the process, Notes from phone calls or virtual communications
Technical Information	IP address or device information -if an online recruitment portal is used, Logs of activity within recruitment system
Consent and Legal Compliance Data	Consent for data processing, Right-to-work documentation

Annex 2

**The legislation in these countries permits the use of any of the following legal bases for processing employees' personal data:
- performance of a contract, legitimate interest, legal obligations, and consent.**

Bulgaria	Brazil	Croatia	Egypt	Georgia	Hungary	India	Moldova	Philippines	Poland
Republic of Cyprus	Romania	Republic of Slovenia	Singapore	Serbia	Turkey	Thailand	USA (Washington DC)	Uzbekistan	United Kingdom

Annex 3

**The legislation in these countries permits the use of any of the following legal basis for processing the employees' personal data:
- performance of a contract, legal obligations and consent.**

Argentina	Armenia	Belarus	Malaysia	Mexico	Peru	Russia	Vietnam
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Annex 4

**The legislation in these countries permits the use of any of the following legal basis for processing the employees' personal data:
- legal obligations and consent.**

Azerbaijan	Costa Rica	Chile	Colombia	Kazakhstan
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Annex 5

The legislation in these countries permits the processing of employees' personal data only based on their consent.

Cambodia	Kyrgyzstan	Myanmar	Paraguay	Venezuela	Tajikistan
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Version Control

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Initial Issue	V.1.0	December 10 th 2024