

## Epredia Recruiting Privacy Notice

This Recruiting Privacy Notice (Privacy Notice) applies to the collection, use and storage of the personal data of job applicants by Epredia or its subsidiaries and affiliates in connection with our online and offline recruitment activities. This Privacy Notice is designed to help you understand who we are, what personal data we collect about you, why we collect it, what we do with it during our recruitment process and what choices you have in relation to these activities.

Personal data as used in this Privacy Notice refers to all information that relates to an identified individual or to an identifiable individual (i.e., information about you). For example, your name, address, email address, educational and employment background, CV and job qualifications.

Please read this Privacy Notice to understand how we use your personal data in connection with our recruitment activities.

### Your Responsibilities

We remind you that it is your responsibility to ensure, to the best of your knowledge, that the personal data you provide us with are accurate, complete, and up-to-date. If you choose to share personal data of other people (such as dependents) with us, it is your responsibility to collect such personal data in compliance with local legal requirements. For instance, you should inform such other people, whose personal data you provide to Epredia, about the content of this Privacy Notice.

1) Data Controller Responsible for Processing your Personal Data: Epredia, its subsidiaries and its affiliates are responsible for processing your personal data as described in this Privacy Notice. When this Privacy Notice mentions “we,” “us,” or “Epredia,” it refers to the controller of your personal data under this Privacy Notice, namely the Epredia affiliate or subsidiary which may be interested in offering you a position or that otherwise decides which of your personal data are collected and how they are used. You may obtain a list of the Epredia’s affiliates by contacting the Data Protection Officer (you will find the contact details in Section 14 “Contact Us”).

2) Types of Personal Data We Collect About You: Below you will find an overview of the categories of personal data that we may process during the recruitment process:

Type of Data	Examples
Identification Data	Name, gender, country, date and place of birth, nationality, language(s) spoken, marital/civil partnership status, domestic partners, dependents

Type of Data	Examples
Contact Information	Email, phone, address
Network Traffic Data	Identification numbers, location data, online identifiers, IP address, cookies, device ID, websites visited, language settings
Account Login Information	Login ID, password, other information used to access and/or secure EpreDia systems and applications including the career website
Images from which you may be identified	Pictures uploaded into CV or otherwise provided to us by you
Data regarding qualifications and career development	Any information contained in CVs and additional documents containing personal details (e.g. diplomas, certificates) as provided by applicants, educational and employment background, job qualifications and work eligibility, including your visa and immigration status, driver's license information, employment references and related information, compensation requests
Special Categories of Personal Data/Sensitive Personal Information	<p>When permitted by local law:</p> <ul style="list-style-type: none"> <li>•Information about disabilities to the extent relevant for the performance of your work: for instance, where we would be required to make work or workspace adaptations or adjustments.</li> <li>•Racial or ethnic data: for instance where this would show from pictures, photographs and other visual images, but also where such data is processed for diversity related purposes</li> </ul>
Criminal Data	Data relating to criminal behavior, criminal records or proceedings regarding criminal or unlawful behavior (only in certain countries, for certain roles and only upon request of EpreDia)
Compensation and payroll	Bank account information, desired salary, compensation, and benefits
Any other information you choose to share with EpreDia	Feedback, opinions, information provided in emails and letters, during telephone calls and conversations

## Information We Collect Automatically

When you apply for a job offered by us, use our recruitment channels, or visit our career websites, in addition to the information you provide to us directly, we may collect information sent to us by your computer, mobile phone or other access device. For example, we may collect the name of your internet service provider, the website that you used to link to our Website, the websites that you visit from our website, the type of device you use, a unique device identifier (such as your device IMEI

number, MAC address of the device's wireless network interface, or the mobile phone number used by the device, mobile network information) your operating system and software version number, IP address, the type of browser you use, the country and language code and time zone setting. We do not use this information to identify any individual.

Additionally, if you visit our premises, for security reasons we might also record your personal data through video or other electronic, digital, or wireless surveillance system or device (e.g. CCTV).

### **Information We Collect From Other Sources**

To the extent permitted by applicable law, in addition to our recruitment channels or career websites, we may also obtain information about you from other sources, such as from third party recruiters or other websites on the Internet (subject to such third party's privacy notices), or from a background check report.

3) The Reasons for Processing your Personal Data: To enable us to carry out the recruitment process and to process your application, we may process your personal data for the following purposes.

- to enable your use of the EpreDia Careers website and to process information about you for recruiting purposes, we may process your personal data:
- to identify and evaluate candidates, assess skills, qualifications and interest against EpreDia career opportunities;
- to set up and conduct interviews and assessments, to evaluate, select and recruit applicants;
- to conduct background checks as required or permitted by applicable local law;
- to contact third party references provided by applicant to evaluate applicant's previous performances or as otherwise necessary in context of recruitment activities; or
- to enable your use of the EpreDia careers website when you choose to register for an account.

To manage and improve relationships with current and potential job candidates, we may process your personal data:

- to identify and evaluate candidates, assess skills, qualifications and interest against EpreDia career opportunities:

- to contact applicants by phone or email;
- to inform applicants of available vacancies;
- to provide applicants with information relating to their application and to fulfil requests;
- to offer applicants suitable opportunities for employment within EpreDia;
- to respond to applicants' requests;
- to keep records related to the EpreDia hiring process; or
- to better understand how our career website is used and to improve the recruitment experience.

To comply with local legal and regulatory requirements, we may process your personal data:

- to provide information to government institutions or supervisory authorities as applicable in all countries in which EpreDia operates, such as tax and national insurance deductions, record-keeping and reporting obligations;
- to comply with government inspections and other requests from government or other public authorities;
- to respond to legal process such as subpoenas; or
- to pursue legal rights and remedies, and manage any internal complaints or claims.

To maintain the security of our career website and our sites, systems and networks, we may process your personal data:

- to deploy and maintain technical and organizational security measures; or
- to conduct internal audits and investigations.

In defense of legal claims, we may process your personal data to establish, exercise or defend legal claims to which EpreDia is subject.

4) Legal Bases for Personal Data Processing (For Individuals in the European Economic Area, Switzerland and United Kingdom). In order to be able to process your personal data, we may rely on different legal bases, including:

- your consent (only when legally required or permitted). If we rely on your consent as a legal basis for processing your personal data, you may withdraw your consent at any time;
- the necessity to establish a contractual relationship with you;
- the necessity for us to comply with legal obligations and to establish, exercise, or defend against legal claims;
- the necessity to pursue our legitimate interests, including;
- to ensure that our networks and information are secure;
- to administer and generally conduct business within EpreDia; and
- to prevent or investigate suspected or actual violations of law;
- the necessity to respond to your requests (such as responding to your requests regarding the handling of, deletion of, or changes to your personal data);
- the necessity to protect the vital interests of any person; or any other legal basis otherwise permitted by local laws;

5) Sharing your Personal Data: To fulfill the purposes for which your personal data has been collected (refer to Section 3 on “The Reasons for Processing your Personal Data”) we may disclose your personal data with:

- EpreDia Affiliates: Due to our global nature, your personal data may be shared with certain EpreDia affiliates. Access to personal data within EpreDia will be limited to those who have a need to know the information, for the purposes described in this Privacy Notice, and may include your interviewers, the relevant manager(s) of the respective job offer and other selected personnel within EpreDia.
- Service Providers: We may outsource certain personal data processing activities to trusted third party service providers to perform functions and provide services to us, such as IT service providers, consultants, and background check providers.
- Public and Governmental Authorities: When required by law, or as necessary to protect our rights, we may share your personal data with entities that regulate or have jurisdiction over EpreDia.
- Professional advisors and others: We may share your personal data with other parties including professional advisors, such as lawyers.

- Other parties in connection with corporate transactions: We may also, from time to time, share your personal data during corporate transactions, such as during a sale or purchase of any EpreDia business or asset, or any reorganization, merger, joint venture, or other disposition of EpreDia's business, assets, or stock.

6) Storing your Personal Data: Due to our global nature, the personal data you provide to us may be transferred to or accessed by EpreDia affiliates and trusted third parties from many countries around the world. As a result, your personal data may be processed outside the country where you live if this is necessary for the fulfilment of the purposes described in this Privacy Notice. If you are in the European Economic Area, we may transfer your personal data to countries located outside of the European Economic Area. Some of these countries are recognized by the European Commission as providing an adequate level of protection. For transfers from the European Economic Area to other countries that are not recognized by the European Commission as providing an adequate level of protection, we have put in place adequate measures to protect your personal data, such as organizational and legal measures (e.g. binding corporate rules and approved European Commission standard contractual clauses). You may obtain more information about these measures by contacting the Data Protection Officer. You will find the contact details in Section 14 "Contact Us." We will process any request in line with any local laws and our policies and procedures.

If you are a resident of a country with data localization laws, your personal data will be stored on servers located within your country.

7) Retention of Your Personal Data: We will retain your personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include:

- the length of time we have an ongoing employee relationship with you;
- whether there is a legal obligation to which we are subject; or
- whether retention is advisable in light of our legal position (such as applicable statutes of limitations, litigation or regulatory investigations).

For the purposes of the EpreDia Careers website, the retention period will be 1 year from the date you register for an account.

8) Keeping your Personal Data Secure: EpreDia implements appropriate administrative, technical and physical safeguards to protect the confidentiality, integrity and availability of your personal data. We will take appropriate measures that are consistent with applicable privacy and data security laws and regulations, including requiring our service providers to use appropriate measures to protect the

confidentiality and security of your personal data. Depending on the state of the art, the costs of the implementation and the nature of the data to be protected, we put in place technical and organizational measures to prevent risks such as destruction, loss, alteration, unauthorized disclosure of, or access to your personal data.

9) Use of Cookies: We use cookies and similar technologies. These are small data files that are sent to your browser and placed on your computer's hard drive when you visit a website. The information the cookie contains is set by a website's server and it can be used when the user visits the website. Cookies are designed to remember things that an internet user has done while on a website in the past, which can include logging in or clicking on links. We make continuous improvements and changes to the ways we use cookies and similar technologies and we will keep this section of our Privacy Notice updated with the cookies we use. We use the following cookies on our website: Strictly necessary cookies: Required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, to move around the website and to use its features.

Functionality cookies: These recognize you when you return to our website. This enables us to personalize our content for you, for example, your choice of language or region.

Analytical/performance cookies: Allowing EpreDia to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Some of these are persistent cookies that may be used if you log on to restricted areas of our website to remember who you are. Others are session cookies that may be used for anonymous identification of a website visit for technical purposes only. Session cookies are stored only temporarily during the browsing sessions and are deleted once the browser is closed.

We use cookies and similar technologies for the following purposes:

- to improve our website security;
- to identify you when you sign-in to our website and remember your preferences;
- to analyze how you use our website by tracking specific actions on our website, such as visits to the various pages of our website;
- to collect anonymous statistical information on how visitors use our website so that we can make improvements to its usability and to improve content delivery value;

We also use cookies and similar technologies provided by other companies to collect web traffic information such as time, date, IP address, and browser, so that we can store your preferences and other information on your device and save you time on subsequent visits by eliminating the need to repeatedly enter the same information. In most circumstances the information captured cannot identify you as an individual. This data could possibly lead to your identification, but we do not use it to do so.

10) Opting out of cookies: You may refuse to accept cookies by altering the settings on your internet browser (for example Internet Explorer, Chrome and Firefox). Please note that if you choose not to permit cookies some areas of our Website may not function properly or be accessible.

In general, by consulting the help menu item in your internet browser, instructions on how to disable or delete cookies is available. Most browsers are set-up to accept these cookies automatically. In addition, you can deactivate the storing of cookies or adjust your browser to inform you before the cookie is stored on your computer. You may also use self-regulation programs available in your jurisdiction to manage the way that companies other than Google advertise to you, such as the EU-based Your Online Choices.

11) Exercising Your Rights: Residents of the European Economic Area (EEA), United Kingdom or Switzerland: You have the right to: request

(a) access to the personal data we hold about you; (b) request we correct any inaccurate personal data we hold about you; (c) request we delete any personal data we hold about you; (d) restrict the processing of personal data we hold about you; (e) object to the processing of personal data we hold about you; and/or (f) receive any personal data we hold about you in a structured and commonly used machine-readable format or have such personal information transmitted to another company. We may ask you for additional information to confirm your identity and for security purposes, before disclosing information requested to you. Where you have been asked to consent to the processing of your personal data, we will provide you with an opportunity to withdraw your consent. You can withdraw consent, such as by contacting us using our contacts details below. In each case you will be given information about how to withdraw consent. Any withdrawal of consent will not affect the lawfulness of the processing based on your consent before the withdrawal. Please also note that where you withdraw consent, we will only stop processing your personal data that relates to the withdrawal of consent. If you would like to review, change, restrict, or delete the personal data you have supplied to us (to the extent EpreDia is not otherwise permitted or required to keep such personal data), if you wish to object to certain data processing operations (as permitted by applicable law), or if you would like to receive a copy of your personal data (in a common machine readable format, to the extent such is required by applicable law), then you can contact: [privacy@epredia.com](mailto:privacy@epredia.com).

For any other questions related to the protection of your personal data by EpreDia or regarding this Privacy Notice in general, you can contact the Data Protection Officer at [privacy@epredia.com](mailto:privacy@epredia.com) or by



mail to Epredia, 20 Post Rd., Portsmouth, NH 03801. We will process any request in line with any local laws and our policies and procedures. If you in the EEA, Switzerland or the United Kingdom you have the right to lodge a complaint about how we process your personal data with the supervisory authority in your country. In the EEA, the relevant authority would be the Autoriteit Persoonsgegevens in the Netherlands.

12) Your Responsibilities: We would like to remind you that it is your responsibility to ensure, to the best of your knowledge, that the personal data you provide us with are accurate, complete, and up-to-date. Furthermore, if you choose to share personal data of other people (such as dependents) with us, it is your responsibility to collect such personal data in compliance with local legal requirements. For instance, you should inform such other people, whose personal data you provide to Epredia, about the content of this Privacy Notice and obtain their consent (provided they are legally competent to give consent) for the use of that personal data by Epredia as set out in this Privacy Notice (including transfer and disclosure).

13) Changes to this Privacy Notice: Any changes we make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Notice.

14) Contact Us: Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to the Data Protection Officer at [privacy@epredia.com](mailto:privacy@epredia.com) or to Epredia, 20 Post Rd., Portsmouth, NH 03801. If you contact us, we will do our utmost to address any concerns you may have about our processing of your personal data.

### **California Privacy Rights**

Our California Privacy Disclosure explains how Epredia collects, uses and discloses the personal information of California residents subject to the California Consumer Privacy Act, amended by the California Privacy Rights Act ("California Privacy Rights Act"). This Disclosure also applies to residents of other US States with similar privacy laws, as applicable.

For more information about how we collect, disclose and secure information about our customers, please refer to our Privacy Statement.

To the extent this notice conflicts with our Privacy Statement, this Disclosure takes precedence for California residents.

#### **California Disclosure**

Personal Information under the California Privacy Rights Act: Under the California Privacy Rights Act, "Personal Information" is information that identifies, relates to, or could reasonably be linked to a particular California resident or household.

**Personal Information We Collect:** We collect Personal Information about California residents in a variety of contexts. The main reason we collect Personal Information about California residents is to provide products and services. However, the Personal Information that we collect, use and disclose about a California resident will depend on our relationship with that resident. In the previous 12 months, we have collected the following types of Personal Information about California residents subject to the California Privacy Rights Act:

1. Identifiers, such as name and email address
2. Internet or network activity information, such as browsing history and interactions with our website
3. Inferences drawn from any of the Personal Information listed above to create a profile about an individual's characteristics

**How We Use Personal Information:** The purposes for which we use the Personal Information that we collect about California residents depends on our relationship with the specific individual. Generally, we may use Personal Information to operate, manage and maintain our business, to provide our products and services, and to achieve our business objectives. For example, we use Personal Information to assess job applicants. We do not use sensitive personal information, such as medical information, to provide this Careers Website. Additional information on how we may use personal information can be found in the section titled "How we use your data" above.

**How We Share Personal Information:** We share Personal Information about California residents for our business purposes in a variety of contexts. For example, we disclose Personal Information about California residents to our recruitment service providers. In the past 12 months, we have disclosed to third parties, such as our recruitment partners, the following categories of Personal Information about California residents that are subject to the California Privacy Rights Act: (1) Identifiers, such as name, and email address; (2) Internet or network activity information, such as interactions with our website; (3) Inferences drawn from any of the Personal Information listed above to create a profile about an individual's characteristics, for example.

**How Long We Keep Personal Information:** We keep your Personal Information for as long as needed or permitted taking account of the purpose(s) for which it was collected, and we will also consider (i) if you successfully applied for a job; (ii) if retention is required by a relevant legal obligation; or (iii) if it is legally advisable (such as litigation or regulatory investigations, or the time available to bring a legal claim). We may remove Personal Information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Similarly, we may delete Personal Information at any time and without providing a reason.

**How to Access, Correct or Delete Your Personal Information:** please see the general privacy rights section below.

**We Do Not Sell Personal Information:** As stated in this Disclosure, in the past 12 months we have not "sold" Personal Information about California residents. In this Disclosure, "sold" means the disclosure of Personal Information for monetary or other valuable consideration, and "shared" means the business sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, an individual's Personal

Information to a third party for cross-context behavioral advertising, whether for monetary or other valuable consideration.

**Sharing Personal Information and Opt-Out Right** In the past 12 months, we have shared the following types of Personal Information about California residents that are subject to the California Privacy Rights Act, with third parties for cross-context behavioral advertising: (1) Identifiers, such as name and email address; (2) Internet or other electronic network activity information, including, but not limited to, IP address, unique device identifier, browsing history and information regarding an individual's interaction with our website. The main third party with which we share the above categories of Personal Information for cross-context behavioral advertising is LinkedIn.

For more information about how we collect, disclose and secure information obtained through [epredia.com](http://epredia.com) and other websites operated by us and through our "Social Media Pages" and "Targeted Advertising" activities, please review our Privacy Statement.

**CPRA Annual Metrics:** Under the CPRA, we provide on request a copy of the Annual Report that provides requested metrics for the previous calendar year. To access the metrics, contact [privacy@epredia.com](mailto:privacy@epredia.com). Epredia does not sell personal information and therefore does not have any statistics for Opt Out requests.

**Privacy Rights – requests to access, correct and delete personal information**

**Requests for Access to and Correction of Personal Information:** If you are a resident of California you may request that we provide to you the following information covering the 12 months preceding your request: (1) the categories of Personal Information that we collected about you and the types of sources of such Information; (2) the business or commercial purpose for collecting Personal Information about you; (3) the categories of Personal Information about you that we disclosed to third parties for a business purpose and the categories of third party recipients (if applicable); and (4) the Personal Information we collected about you.

Residents of California can also request correction of inaccurate personal information that we have about you. In some cases, we may refuse your request. For example:

- If we cannot verify your identity
- If we cannot confirm that the Personal Information that we hold relates to you
- If an exception under the relevant state laws applies, such as where the disclosure of Personal Information would adversely affect

**Requests to Delete Your Personal Information:** If you are a resident of California, you may also request that we delete Personal Information that we collected about you. We may refuse your request where an exception under the relevant state laws applies.

If you are a resident of California, or any other US State offering similar rights, you can request access, correction, deletion or any of your other privacy rights by contacting [privacy@epredia.com](mailto:privacy@epredia.com) or calling (800) 522-7270. We will let you know if the rights do not apply to you.

Your request must:

- Provide sufficient information to allow us to reasonably verify you are the person about whom we hold personal information, or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, and respond to it.

We cannot provide you with personal information if we cannot verify your identity or authority to make the request or we cannot confirm the personal information relates to you.