



APPLICANT PRIVACY NOTICE

This Applicant Privacy Notice (“Notice”) will provide you with information on our data processing activities with respect to certain personal data about you when accessing and using the Litmos Careers website (“Site”) to apply for a specific job offering of an entity belonging to the Litmos Group (collectively “Litmos” or “we,” “us,” or “our”).

Scope of applicability

This Summary Notice applies to you if you want to use Litmos Careers website.

Processing of your Personal Data (categories of Personal Data)

For purposes of this Notice, personal data means any information about an identifiable individual collected in connection with the recruitment process and the Site. We may collect personal data directly from you, as you apply for a job opening, or may receive personal data from third parties—for example, in connection with a background, employment, or reference check—subject to your consent where required by law. Personal data excludes anonymous or de-identified data that is not associated with a particular individual. We may collect, store, and process the following categories of personal data, which we require in connection with our recruiting activities:

- Contact Details and Identifiers: such as name, title, addresses, telephone numbers, and personal email addresses.
- Facial Images and Video Recordings: such as photos, security video recordings
- Demographic Data: may include date of birth, gender, marital status, spouse and dependents, and certain sensitive data categories as described in the “Collection and Use of Special Categories of Personal Data” section below.
- Professional and Background: such as your work history, certifications, language capabilities, and other relevant experience, qualifications, and recommendations, including information contained in a resume, CV, cover letter, or job application.
- Work Eligibility Status: such as immigration, residency, official government documents, and related information.
- Benefits Information: such as information for determining benefits and cost estimation (which may require personal data similar to that in “Demographic Data” above).
- Other Information: such information as is necessary for a legitimate human resources, business, security, or safety-related purpose.

Failure to provide or allow us to process some of the personal data may affect our ability to accomplish the purposes stated in this Notice.

We utilize a third-party applicant tracking system that collects your information when you visit their site to submit your application to us, using web beacons, cookies, system logs, and other technologies on their sites and related services. For more information, please see their [privacy policy](#).

Sources of Personal Data

We may collect personal data from a variety of third-party sources, including as follows:

- Service providers (e.g., hiring, recruiting service providers, aptitude testing, and applicant tracking systems)



- Insurance and benefits providers
- Background check services
- Online sources including social networks (e.g., LinkedIn, Facebook, twitter, etc.)
- Open government databases and other public sources

Processing Purposes

We process your personal data only where applicable law permits or requires it in connection with carrying out our application, recruitment, and hiring process, including for human resource purposes; and for purposes related to operations and business, security, and safety; and to take steps necessary to enter into an employment contract with you.

Legal justifications for the Processing of your Personal Data

One of the key privacy law requirements is that any Processing of Personal Data has to have a legal justification. We generally use the following legal justifications: the Processing is necessary for (i) the performance of the employment, (ii) compliance with a legal obligation, (iii) realizing a legitimate.

We may process your personal data for the following legitimate business purposes under the legal basis to do so.

(i) Entering into a Contract with You:

- Contact Details and Identifiers; Professional and Background; Benefits Information; Previous Applications; Demographic Data Categories; Inferences used for identifying and evaluating job applicants, including assessing skills, qualifications, and interests for the purposes of determining suitability for the job position you have applied for or other job positions you may be considered for.
- Contact Details and Identifiers; Professional and Background; Benefits Information; Previous Applications Categories; Inferences used for verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.
- Contact Details and Identifiers Categories used for communicating with you about the recruitment process and your application.
- Contact Details and Identifiers; Other Information Categories use for reimbursement of costs made by you for which you are eligible to receive reimbursement.
- Contact Details and Identifiers; Demographic Data; Work Eligibility Status Categories used for assisting you with obtaining an immigration visa or work permit where required.

(ii) Legitimate Interests:

- Contact Details and Identifiers; Professional and Background; Benefits Information; Previous Applications; Demographic Data Categories; Inferences used for as permitted by applicable law, verifying your information and carrying out reference checks and/or conducting background checks (where applicable) if you are offered a job position.



- Contact Details and Identifiers Categories used for to send you job opening alerts informing you of other potential career opportunities at Litmos, newsletters, and information regarding upcoming events that we believe will be of interest to you. As part of these communications, we will include an unsubscribe link that you can use if you don't want us to send messages in the future.
- Contact Details and Identifiers; Social Media Categories used for to register you for Litmos recruitment events (if applicable).
- Professional and Background; Benefits Information; Previous Applications Categories; Inferences used for keeping records related to our hiring processes, for only as long as appropriate under the circumstances.
- Other Information Categories used for creating and submitting reports as required by applicable laws or regulations.
- Demographic Data Categories; Other Information Categories; Inferences used for analyzing and improving our application and recruitment process.
- Contact Details and Identifiers Categories; Professional Background; Facial Images and Video Recordings; Other Information Categories; Inferences used for to prevent fraud.
- Other Information Categories; Inferences used for to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- Contact Details and Identifiers; Facial Images and Video Recordings Categories; Inferences to manage monitor, protect and improve office space, facilities, catering, including monitoring and administering building occupancy, physical security systems such as CCTV, guest logs; exit and entry times and emergency services notification.

(iii) Compliance with Legal Obligations:

- Professional and Background; Demographic Data; Facial Images and Video Recordings; Benefits Information Categories; Inferences used to comply with our legal, regulatory, or other corporate governance requirements.

We will process your personal data only for the purposes we collected it for, or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent only where required by applicable law or regulation.

You will not be subject to hiring decisions based solely on automated data processing without your prior consent.

Collection and Use of Special Categories of Personal Data

The following special categories of personal data may be considered sensitive under the laws of your jurisdiction and may receive special protection: racial or ethnic origin; political opinions; religious or philosophical beliefs;



trade union membership; genetic data; biometric data; data concerning health; data concerning sex life or sexual orientation; and data relating to criminal convictions or offenses.

We may collect and process the following special categories of personal data when you voluntarily provide them, or when we receive them from a third party with your consent, when relevant for a particular job position to carry out our obligations under employment law, or as applicable law otherwise permits:

- Physical or mental health condition or disability status to determine appropriate accommodations and evaluate fitness for a particular job position.
- Race or ethnic origin to comply with statutory obligations.
- Previous criminal charges or convictions where relevant for the job position.

Where we have a legitimate need to process special categories of personal data about you for purposes not identified above, we will do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

Sharing of Personal Data

We will disclose your personal data to third parties only as described in this Notice or where required by law, or to our employees, subsidiaries, affiliated companies, contractors, designated agents, or third-party service providers who require such information to assist us with administering our application, recruitment, and hiring process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including but not limited to: obtaining employment verification and background checks, assisting with travel arrangements, reimbursement of interview expenses, and data storage or hosting. These third-party service providers may be located outside of the country in which you live or the country where the job position you have applied for is located.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data, consistent with our policies and any data security obligations applicable to us. We do not sell your personal data. We do not permit our third-party service providers to process your personal data for their own purposes. We permit them to process your personal data only for specified purposes in accordance with our instructions.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- **Compelled Disclosures:** Litmos may be required to release personal information in response to a legal obligation or legal process. Such obligations may include lawful requests by public authorities, including to meet national security and law enforcement requirements. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we disclose only the minimum personal data necessary for the specific purpose and circumstances to comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders.
- We will also access, transfer, disclose, and preserve personal data when we believe that doing so is necessary to:
- operate and maintain the security of our computer systems and networks, including to prevent or stop an attack on our computer systems or networks;



- protect the rights and property of Litmos; and
- act in urgent or emergency circumstances such as protecting the health or safety of a candidate, employee, agent, customer, or member of the public.
- Where the personal data is publicly available.
- Analytical Purposes: in aggregate form and/or a form that does not identify an individual; for example, demographic profiling or industry analysis.
- If a business transfer, corporate transaction, change in ownership, or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or transfer, divestiture, or sale of business or assets occurs and the disclosure is a part of the transaction.
- For additional purposes with your consent, where such consent is required by law.

Cross-Border Data Transfers

We transfer your Personal Data outside of the country you are located in. Some recipients of your Personal Data are located in another country for which the European Commission has not issued a decision that this country ensures an adequate level of data protection, namely: The U.S. or some of the locations of non-European Litmos group companies.

Some recipients located outside of the European Economic Area ("EEA") are located in countries for which the European Commission has issued adequacy decisions. In each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective (Art. 45 GDPR).

By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses (2010/87/EU and/or 2004/915/EC) as referred to in Art. 46 (2)(c) GDPR or other adequate means, which are accessible via the contact details below we have established that all other recipients located outside the EEA will provide an adequate level of data protection for the Personal Data and that appropriate technical and organizational security measures are in place to protect Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. Any onward transfer (including Our affiliates outside the EEA) is subject to appropriate onward transfer requirements as required by applicable law.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties who have a legitimate business need for such access.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will retain your personal data only as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting requirements, or as necessary to resolve disputes. Please contact us using the details below if you require further information.



We have the right to delete application information at any time, and you may want to retain copies of any information, including resumes/CVs that you provide to us during the application process.

Under some circumstances, we may anonymize your personal data so it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

If you are offered and accept employment: The personal data we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal data policies.

If you are not offered employment and do not become an employee: The personal data collected during the application and/or recruitment process will be retained in order to consider you for other jobs. Additionally, Litmos may refer back to personal data collected earlier in the event you submit a new application in the future. Litmos will retain your personal data as documented in our corporate data retention schedule unless otherwise required by law.

Your statutory rights

Under the conditions set out under applicable law (i.e., the GDPR), you have the following rights:

- 1. Right of access:** You have the right to obtain from us confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data have been or will be disclosed.

You have the right to obtain a copy of the Personal Data undergoing processing. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.
- 2. Right to rectification:** You have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.
- 3. Right to erasure (right to be forgotten):** You have the right to ask us to erase your Personal Data.
- 4. Right to restriction of processing:** You have the right to request the restriction of processing your Personal Data. In this case, the respective data will be marked and may only be processed by Us for certain purposes.
- 5. Right to data portability:** You have the right to receive the Personal Data concerning you which you have provided to us in a structured, commonly used and machine-readable format and you have the right to transmit those Personal Data to another entity without hindrance from us.
- 6. Right to object:**

You have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us and we can be required to no longer process your Personal Data. If you have a right to object and you exercise this right, your Personal Data will no longer be processed for such purposes by us. Exercising this right will not incur any costs.

Such a right to object may not exist, in particular, if the processing of your Personal Data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.



Please note that the aforementioned rights might be limited under the applicable national data protection law.

If you wish to exercise your data subject rights, please address your request to HR_Data_Protection@litmos.com. The data protection officer of the Litmos group can be reached via privacy@litmos.com.

In case of complaints, you also have the right to lodge a complaint with the competent supervisory authority, in particular in the Member State of your habitual residence or alleged infringement of the GDPR.

Additional Disclosures for California Applicants

These disclosures describe the categories of personal data that Litmos collects about you, and the purposes for collecting that data.

Litmos collects the following categories of personal data in relation to your consideration for employment with Litmos:

- Identifiers
- Financial, medical, or health insurance information
- Demographics
- Commercial information
- Professional or employment-related information
- Internet or other electronic network activity information
- Geolocation information
- Audio, visual, or other similar information
- Inferences drawn from information in other categories

For more detail about the types of personal data we collect and the purposes for which we use your data, please refer to the “Collection of Personal Data,” “Use of Personal Data and the Legal Bases,” and “Collection and Use of Special Categories of Personal Data” sections of this Notice.

Litmos does not sell your personal information as defined by the California Consumer Privacy Act and has not done so in the past 12 months.

Changes to This Notice

We reserve the right to update this Notice at any time. If you want to see changes made to this Notice from time to time, we invite you to access this Notice to see the changes. If we make material changes or changes that will have an impact on you (e.g., when we start processing your personal data for purposes other than set out above), we will contact you prior to commencing that processing.

How to contact us

If you wish to exercise your data subject rights or if you have any other questions concerning this Notice, please address your request to HR_Data_Protection@litmos.com or to our data protection officer who can be contacted at privacy@litmos.com.