

# Candidate Privacy Notice

*Last Modified: October 17, 2023*

## Introduction

Aylo (hereinafter “We”, “Us” “Our” or derivatives and/or variants thereof) respects your privacy and are committed to protecting your personal data. We are the controller of the information collected or provided to us via the application form. This means that We are responsible for deciding how We hold and use your personal information. Personal data, also referred to as personal information, means any information about an individual by which that individual can be identified (“Personal Information”). This notice intends to inform you of which recruitment purposes your Personal Information will be used, and for how long it will be retained.

## The kind of information We hold about You

In connection with your application to work with us, We will collect, store and use the following categories of Personal Information about you:

- The information you have provided to us in your Curriculum Vitae or Resume and cover letter.
- The information you have provided in our application form, including first name, last name, telephone number, personal email address and location (City).
- Any information you provide to us during an interview.
- Interview-related test results (applicable for some positions).
- Any information provided by referees.
- Information collected through background checks.
- Information collected via your LinkedIn Profile.

We may also collect, store, and use the following types of more sensitive Personal Information:

- Information about your race or ethnicity, religious beliefs and/or sexual orientation.
- Information about your health, including any medical condition, health, and sickness records.

## How is your Personal Information collected?

We may collect Personal Information about candidates from the following sources:

- You, the candidate;
- Recruitment agency;
- Referees;
- Information collected through background checks; and/or
- Data from third parties that constitute a publicly accessible source, e.g., LinkedIn.

## **How We Use Your Personal Information**

We will only use your Personal Information in accordance with the applicable local law and legislation. We will use the Personal Information We collect about you to:

- Assess your skills, qualifications and suitability for the role applied to.
- Communicate with you about the recruitment process.
- Carry out background and reference checks, where applicable.
- Keep records related to Our hiring processes.
- Revisit your job application and Curriculum Vitae for future job openings.
- Where it is necessary for Our legitimate interests, and your interests and where fundamental rights do not override those interests.
- Comply with a legal or regulatory obligation, if applicable.

It is within Our legitimate interests to process your Personal Information in order to consider your candidacy for the job posting applied to. It is in Our legitimate interests to decide whether to appoint you to a role since it would be beneficial to Our business to appoint someone to that role. We also need to process your Personal Information to decide whether to enter into a contract of employment with you.

### **If you fail to provide Personal Information**

If you fail to provide information which is necessary for Us to consider your application, where requested, (such as evidence of qualifications or work history), We will not be able to continue to process your application successfully. For example, if We require a background check or references for the role and you fail to provide Us with the relevant information, We will not be able to further consider your application.

### **Automated decision-making**

You will not be subject to any decisions that will have a significant impact on you based solely on automated decision-making.

## **Disclosure of Your Personal Information**

We may share your personal information with our trusted third-party recruitment and onboarding software provider to facilitate the application and hiring process. This provider assists us in our application screening, communication, background checks, job offers, and onboarding process. To ensure compliance with applicable privacy laws, your data is disclosed under a Data Protection Agreement. We may also disclose your personal information to conduct necessary background checks with local authorities where applicable and in compliance with local laws. Additionally, disclosure may occur when required by law or to safeguard our rights and the safety of individuals. By applying on our website, you consent to the outlined disclosures.

## **Transfers of Your Personal Information to Other Countries**

Whenever in the course of sharing information We transfer Personal Information to countries outside of the European Economic Area and other regions with comprehensive data protection laws, We will ensure that

the information is transferred in accordance with our Privacy Policy, found herein above, and as permitted by applicable laws and legislations on data protection.

By applying for the position, you consent to the transfer of information that We collect about you, including Personal Information, to any country in which We, members of Our corporate group (that is, legal entities that control, are controlled by, or are under common control with Us) or Our service providers are located.

Some services are hosted on servers located in the United States. Greenhouse System, our recruitment and onboarding software, and its sub-processors are located in the United States as well. This means that your Personal Information will be processed in the United States. However, in the interest of maintaining your privacy, appropriate safeguards are taken, to ensure that your Personal Information will remain protected in accordance with our Privacy Policy, such as the use of Standard Contractual Clauses (SCC). We take the security of your Personal Information very seriously, and the SCCs are deployed for ensuring such security is achieved in compliance with the privacy regulations of the European Union (EU), even when your data is transferred outside of the EU.

## **Data security**

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used, or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your Personal Information based on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator in the event of a breach.

## **Retention of Personal Information**

If you are unsuccessful, We will retain your Personal Information for a period of twelve (12) months from the date of submission of your application and for an additional period of up to twelve (12) months, following your last communication with People, Talent and Culture (“PTC”). We retain such Personal Information in case a similar role becomes vacant for which you may be considered as a potential candidate.

Information relating to successful candidates will be transferred to their employment records. This will be limited to that information which is deemed necessary for the establishment of a working relationship and, where applicable, that is required by law.

## **Your Rights Related to Your Personal Information**

### **Your rights in connection with your Personal Information**

Under certain circumstances, by law, you have the right to:

- **Request access** to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Information We hold about you and to check that We are lawfully processing it.
- **Request correction** of your Personal Information that We hold. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your Personal Information. This enables you to ask Us to delete or remove Personal Information where there is non-compelling reason for Us to continue to process it.
- **Object to processing** of your Personal Information where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to the processing on this ground.
- **Request the restriction of processing** of your Personal Information. This enables you to ask Us to suspend the processing of your Personal Information, for example, if you would like Us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your Personal Information to another party.

If you wish to review, verify, correct or request erasure of your Personal Information, object to the processing of your Personal Information, or request that We transfer a copy of your Personal Information to another party, please contact us at [privacy@aylo.com](mailto:privacy@aylo.com).

### **Right to withdraw consent**

By applying for this role, you consent to Us processing your Personal Information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact [privacy@aylo.com](mailto:privacy@aylo.com). Once We have received notification that you have withdrawn your consent, We will no longer process your application and, subject to Our retention policy, We will dispose of your Personal Information securely.

### **California Rights and Choices**

The California Consumer Privacy Act (the “CCPA”) provides you with certain rights in relation to your Personal Information:

- *Right to Know*: You have the right to request that We disclose certain information about Our collection of your Personal Information over the past twelve (12) months, including the specific pieces of information We collected.
- *Right to Request Deletion*: You have the right to request that We delete any of your Personal Information We have collected and retained from you, subject to certain exceptions set forth in the CCPA.

*Right to Non-Discrimination for the Exercise of Your Rights*: We will not discriminate against you because you have exercised any of your rights under the CCPA.

**Data protection officer (DPO)**

A DPO is appointed to oversee compliance with this Candidate Privacy Notice. You have the right to make a complaint at any time to the Data Protection Officer (“DPO”) for data protection issues at [dpo@aylo.com](mailto:dpo@aylo.com).

**Additional Inquiries**

For additional inquiries you may have about your Personal Information which are not provided in this Candidate Privacy Notice, please refer to our [privacy policy](#).