

Candidate Privacy Notice

Last Modified: January 15, 2025

Introduction

Aylo (hereinafter “**We**”, “**Us**” “**Our**” or derivatives and/or variants thereof) respects your privacy and is committed to protecting your Personal Information. We are the controller of the information collected or provided to Us during the recruitment process. This means that We are responsible for deciding how We collect, store or use your Personal Information. Personal Information, also referred to as personal data, means any information about an individual by which that individual can be identified (“**Personal Information**”). This Candidate Privacy Notice intends to inform you about the processing of your Personal Information by Us for the purposes mentioned below.

The Personal Information We Process about You

In connection to your application to work with Us, We may process the following categories of Personal Information about you:

- **Education/career Information:** information you have provided to us in your Curriculum Vitae or Resume and cover letter, information collected via your LinkedIn profile.
- **Contact Information:** information you have provided in our application form, including first name, last name, telephone number, address, email address.
- **Interview Information:** any information you provide to us during an interview, including interview-related test results (applicable for some positions).
- Any information provided by referrers.
- Information collected through background checks.

We will not ask you to reveal any type of more sensitive information, but if you voluntary share this type of information on your CV, We may collect, store, and process the following types of special category Personal Information:

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

The Sources from Which We Collect Personal Information

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

- You, the candidate;
- Recruitment agency;

- Referrers;
- Information collected through background checks; and/or
- Publicly accessible sources, e.g., LinkedIn.

Purposes for Which We Process Your Personal Information

We will only process your Personal Information in accordance with applicable laws and for the purposes described below:

- 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.

Our Legal Bases under Canadian and European Union (EU) Privacy Law

To the extent required by applicable laws, we process your Personal Information only when:

- You provide your consent for a specific purpose: In limited situations, we might rely on your consent to process your personal data, for example to send you communications about Our job postings, careers fairs, newsletters, and related corporate communications, for which we will ask for your clear consent to process your data. You may withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any collection, use, processing, or disclosure that occurred prior to the withdrawal.
- It is necessary to perform a contract or to take steps at your request, before entering a contract.
- It satisfies a legitimate interest which is not overridden by your data protection interests, for example, to consider your candidacy for the job posting applied to, to determine your qualifications for employment, and to make hiring decisions.
- It is necessary to comply with legal obligations: for example, right to work verification.

The legal basis We rely on to process any information you provide as part of your application which is special category data, such as health, religious, or ethnicity information is article 9(2)(b) of the GDPR, which relates to our obligations in employment.

Depending on the circumstances, We may rely on different legal bases when processing your same information for different purposes. If you reside outside the European Economic Area (“EEA”), Switzerland or the United Kingdom (“UK”), the legal bases on which we rely may differ from those listed above.

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. 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 disclose your Personal Information when necessary for the purposes set out in this Candidate Privacy Notice. When We disclose your Personal Information, We usually rely on the performance of Our contract with you, Our legal obligation to do so, Our legitimate interest, so long as it does not outweigh your interests or your consent, except when expressly stated otherwise below in the paragraph “To comply with the law or protect our rights or the rights of third parties”.

Disclosure of your Personal Information may also involve transfers of your Personal Information outside the EEA. To the extent that We need to transfer Personal Information outside the EEA, We will do so according to the section “Transfers of Your Personal Information to Other Countries” or when necessary for the performance of the contract between Us. The parties to whom We may disclose your Personal Information include:

- **Our contractors and/or employees:** Our employees and/or contractors may receive access to your Personal Information only on a need-to-know basis. Such employees and contractors abide by confidentiality obligations.
- **Our corporate group:** We may disclose any of the categories of Personal Information that We collect to members of Our corporate group to the extent this is necessary for the purposes described in this Privacy Notice. You acknowledge that in some cases, members of Our corporate group might be established or run their services outside the EEA.
- **Service providers:** We disclose certain categories of Personal Information to Our authorized service providers, including to Our trusted third-party recruitment and onboarding software provider, who helps Us facilitate the application and hiring process. These service providers may use your information only to perform certain tasks on Our behalf, such as application screening, communication, background checks, job offers, onboarding process, security, hosting. These service providers have limited access to Personal Information needed to perform their functions but are not permitted to process such information for any other purposes. Where required under applicable laws, We have entered into data processing agreements with such service providers to ensure that Personal Information is only processed securely within Our instructions.
- **Legal successors:** We may disclose all categories of Personal Information We process to a buyer or other successor in the event of a merger, acquisition or sale or transfer of some or all Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Such transactions may be in Our legitimate interest, particularly our interest in making decisions that enable Our business to develop.

- **To comply with the law or protect Our rights or the rights of third parties:** We access, preserve and share Personal Information with regulators, public authorities, law enforcement, government agencies, out-of-court dispute settlement bodies or others where we reasonably believe such disclosure is needed to:
 - a) comply with any applicable law, regulation, court order, legal process, government or public authority requests;
 - b) detect, prevent, or otherwise address illegal or suspected illegal activities, security, or technical issues;
 - c) protect against harm to the rights, property or safety of our company, our users, our employees, or others; or
 - d) maintain and protect the security and integrity of our infrastructure. In such cases, we may raise or waive any legal objection or right available to Us, in our sole discretion.

We may disclose your information to third parties for the above purposes where necessary to comply with Our legal obligations, to perform a task in the public interest (where the public interest is laid down by applicable law), or under Our legitimate interests and the interests of the public, including as part of investigations or regulatory enquiries to detect, investigate and prosecute illegal activity.

Transfers of Your Personal Information to Other Countries

We may share the information We collect globally, across Our corporate group and with Our service providers and other third parties. Transfers are necessary for a variety of reasons, including the purposes stated in this Privacy Notice. 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.

Whenever We transfer Personal Information to countries outside the EEA and other regions with comprehensive data protection laws, We will ensure that the information is transferred in accordance with this Privacy Notice, as permitted by the applicable laws and based on appropriate mechanisms. Where applicable, We rely on decisions of the European Commission, known as “adequacy decisions,” recognizing that certain countries offer a level of protection of Personal Information that is essentially equivalent to the EEA.

In other situations, We rely on standard contractual clauses approved by the European Commission (and the equivalent standard contractual clauses for the UK, where appropriate) or on derogations provided for under the applicable law to transfer information to a third country. For more information or to obtain a copy of Our standard contractual clauses, please see the section “Contact Information” below on how to contact Us.

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 three hundred and sixty five (365) days from the date of notifying you of the outcome of your application. If you provide your consent, We will retain such Personal Information in case a similar role for which you may be a potential candidate becomes vacant.

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

Your Rights Related to Your Personal Information

Subject to local law and applicable legal requirements and exemptions, you have certain rights regarding your Personal Information:

- **Right of access:** you have the right to receive information on the personal data We hold about you and how such personal data is used, as well as a copy of your personal data;
- **Right to rectification:** you have the right to rectify inaccurate personal data concerning you;
- **Right to be forgotten:** you have the right to delete/erase your personal data;
- **Right to data portability:** you have the right to receive the personal data provided by you in a structured, commonly used, and machine-readable format and to transmit this personal data to another data controller;
- **Right to object:** you have the right to object to the use of your personal data where such use is based on our legitimate interests or on public interests;
- **Right to restriction of processing:** you have the right in some cases, to restrict Our use of your personal data; and
- **Right to file a complaint:** If you are in the EEA or the UK, you also have a right to file a complaint with your local data protection authority.

If We ask for your consent to process your personal data, you have the right to withdraw your consent at any time with effect for the future.

You can exercise your above rights by contacting us at privacy@aylo.com.

Please note that We have one month to respond to your request. Prior to processing your request, We will need to verify your identity. This is an appropriate and reasonable security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it or deleted in an unauthorized way.

A Data Protection Officer (“DPO”) is appointed to oversee compliance with this Privacy Notice. You can contact our DPO at dpo@aylo.com.

California Rights and Choices

The California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”), provides California residents (“Consumer(s)”) certain rights with respect to their Personal Information, as this term is also defined under the CCPA. In addition to the rights that we state under this Candidate Privacy Notice, and subject to the exceptions found under the CCPA, such Consumers have the right to:

- Opt-out of the sale of their Personal Information, should we sell their Personal Information;
- Be informed of certain information concerning Our collection and use of their Personal Information;
- Request that We delete certain personal information we collected from them;
- Appoint an agent to exercise their rights provided for by the CCPA, provided that a duly executed notarized power of attorney is presented and provided that the agent has information deemed sufficient to allow Us to verify the identity of the Consumer in question and to locate his/her information in our systems;
- Not be subjected to discrimination for the exercise of these rights. We will not deny California residents the use of Our service, neither will We provide a different level or quality or services for exercising any of their CCPA rights, unless as permitted under the CCPA.

Additional Inquiries

For additional inquiries you may have about your Personal Information which are not provided in this Candidate Privacy Notice, please contact Us at privacy@aylo.com.