

Crownpeak Candidate Privacy Notice

Our Responsibilities

This privacy notice for Crownpeak Technology, Inc. and any of its subsidiaries ('we', 'us' or 'Crownpeak,') describes how we collect, store, use, and/or share ('process') your personal information when you apply to work for us as a candidate for one of our opportunities.

We respect your privacy and are committed to protecting your personal information. This notice explains how we use, store and share the information we collect about you, how you can exercise your rights in respect of that information and the procedures that we have in place to safeguard your privacy.

We keep this notice under review and will reflect any updates or changes to practice within this notice (to reflect changes in operations and the way we process your information). This notice was last updated on 20th March 2024.

Contacting Us

Crownpeak is the data controller and is responsible for the processing of your information. If you have any questions about this Notice, including any requests to exercise your legal rights, please contact us at:

privacy@crowpeak.com

What Personal Information Will We Collect About You?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include information where the identity has been removed ('anonymous data').

Depending on the jurisdiction (country) in which you reside and in line with the applicable data protection legislation, we will collect, use, store and transfer different kinds of personal information which we have grouped together as follows:

Category	Examples
Identifiers	Contact details, such as full name, alias, title, home address, post code, phone number, email address, date of birth and any other information provided on your CV and/or during the application and recruitment process.
Professional or employment-related information	Job title(s), work history, education, qualifications, named referees and any other

information provided on your CV and/or during the application and recruitment process.

Publicly available information

Information available on social media, professional forums, and platforms.

How Will We Collect Your Personal Information?

We use different methods to collect data from and about you including:

Personal information we collect directly from you: this is information about you that we collected through your application form, CV, cover letter; obtained from correspondence with you, through interviews, meetings or other assessments.

Personal information we collect from other sources: this is information about you obtained from recruitment platforms, recruitment agencies as well as publicly available sources (such as social media).

How Do We Use Your Personal Information?

The following table sets out why we process your personal information and also our lawful basis for processing it. We may rely on more than one lawful basis for processing your personal data depending on the context of the processing activity.

Purpose/Activity	Lawful Basis for Processing
To assess your skills, qualifications, and suitability for the role.	This processing is carried out under our legitimate interests as part of our recruitment process, so that we can determine your suitability for a role with us.
To conduct interviews and provide you with relevant updates regarding the recruitment process.	This processing is carried out under our legitimate interests as part of our recruitment process, so that we can determine your suitability for a role with us.
To keep records related to our hiring processes.	This processing is carried out under our legitimate interests to ensure the accuracy of our record-keeping and the information that we hold.

To make an employment offer to successful candidates.	This processing is necessary for the performance of a contract (...or in order to take steps at your request prior to entering into a contract of employment).
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In certain circumstances, we will process your personal information based on our legitimate interests. We have decided this by carrying out a balancing exercise to make sure our legitimate interest does not override your privacy rights as an individual. We document the balancing exercises that we carry out when relying upon this lawful basis for processing your personal information.

How Long Will We Keep Your Personal Information?

We will retain your personal information for a period of 2 years after we have communicated to you our decision about whether to appoint you for the role you applied for.

After this period, we will securely destroy your personal information.

Should we wish to retain your personal information in case a further opportunity may arise that we may consider you for, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Sharing Your Personal Data:

We will only disclose your personal information to:

- Third parties, such as our recruitment partners and/or Employer Of Record (EOR).
- Other entities within our Group.

Security of Your Personal Data

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to our staff, agents, contractors and other third parties on a 'need to know' basis only. They will only process your personal information under our instructions, and they are subject to a duty of confidentiality.

In addition, we have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

International Transfers of Your Personal Data

Your personal information may be transferred globally in accordance with appropriate safeguards. When we transfer personal data to countries outside of the United Kingdom and European Economic Area ('EEA'), we will do so in a lawful way and may rely on:

- An adequacy decision, which says that the recipient country provides an adequate level of protection of personal data.
- Appropriate safeguards to protect the personal data (for example, the approved Standard Contractual Clauses or International Data Transfer Agreement).
- A lawful exception to the rules relating to overseas data transfers (for example, where the transfer is necessary to perform a contract with you, which is in your interests).

Crownpeak Technology, Inc. complies with the EU-U.S. Data Privacy Framework program (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy program Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Crownpeak Technology, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Crownpeak Technology, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework program Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Notice and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF), and to view our certification, please visit <https://www.dataprivacyframework.gov/>

Crownpeak is responsible for its personal data processing and subsequent transfers to a third party acting as an agent on its behalf. Crownpeak complies with all applicable laws for all onward transfers of personal data from the EU, UK, and Switzerland, including the onward transfer liability provisions.

Your Rights

If you reside in the European Union or United Kingdom, you have certain rights in relation to your personal information. If you would like to exercise these rights, please submit a request to privacy@crowpeak.com, with a description of the nature of your request and the Personal Information at issue. We have summarised these rights below:

Right	Description
To be informed	A right to be informed about the personal information we hold about you.
Of access	A right to access the personal information we hold about you.
To rectification	A right to require us to rectify any inaccurate personal information we hold about you.
To erasure	<p>A right to ask us to delete the personal information we hold about you. This right will only apply where (for example):</p> <ul style="list-style-type: none"> • We no longer need to use the personal information to achieve the purpose we collected it for. • Where you withdraw your consent if we are using your personal information based on your consent. • Where you object to the way we process your information (see the right to object described below). <p>If you request that we delete your information, we will retain minimum personal information to document these requests and thereby avoid using your personal information for any other purpose.</p>
To restrict processing	<p>In certain circumstances, a right to restrict our processing of the personal information we hold about you. This right will only apply where (for example):</p> <ul style="list-style-type: none"> • You dispute the accuracy of the personal information held by us. • Where you would have the right to ask us to delete the personal information but would prefer that our processing is restricted instead. • Where we no longer need to use the personal information to achieve the purpose that we collected it for, but you need the data for the purposes of establishing, exercising or defending legal claims.
To data portability	In certain circumstances, a right to receive the personal information you have given us in a structured, commonly used, and machine-readable format. You also have the right

to require us to transfer this personal information to another organisation, at your request.

To object

A right to object to our processing of the personal information we hold about you where our lawful basis is our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process the personal information which override your rights, or which are for the establishment, exercise or defence of legal claims.

In relation to automated decision-making and profiling

A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affects you.

To withdraw

A right to withdraw your consent, where we are relying on it to use your personal information.

To complain

You have the right to make a complaint to the relevant supervisory authority, depending on your country of residence.

European Union

In the European Union, if you believe that your rights have been infringed by the processing of your personal information, you can contact the German North Rhine-Westphalia Commissioner for Data Protection and Freedom of Information (Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen).

North Rhine-Westphalia Commissioner for Data Protection and Freedom of Information can be contacted by:

Phone: +49 (0)211 / 38424 – 0

Email: poststelle@ldi.nrw.de

Visiting their website: <https://www.ldi.nrw.de/>

Write to: Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen, Postfach 20 04 44, 40102 Düsseldorf, Germany

United Kingdom

In the United Kingdom, you have the right to make a complaint at any time to the Information Commissioner's

Office, the UK supervisory authority for data protection issues (ico.org.uk) or to any equivalent body in the relevant jurisdiction (collectively, the “ICO”).

The Information Commissioner’s Office can be contacted by:

Visiting their website www.ico.org.uk

Phone: 0303 123 1113

Write to: Information Commissioner’s Office Wycliffe House,
Water Lane, Wilmslow, Cheshire, SK9 5A

We would, however, appreciate the chance to deal with your concerns before you make an official complaint, so please contact us in the first instance.

EU-US Data Privacy Framework, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF

In compliance with the EU-US and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Crownpeak Technology, Inc. commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to the DPF Principles. European Union, Swiss and United Kingdom individuals with DPF inquiries or complaints should first contact Crownpeak at privacy@crowpeak.com.

Crownpeak Technology, Inc. has further committed to refer unresolved privacy complaints under the DPF Principles to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See:

<https://www.dataprivacyframework.gov/s/article/G-Arbitration-Procedures-dpf?tabset-35584=2>

We would, however, appreciate the chance to deal with your concerns before you approach the relevant Data Protection Authorities, so please contact us in the first instance.

If you would like to contact us with any queries or comments, request further information or exercise any of your available rights, please use the contact details in the 'Contacting Us' section at the top of this Notice.

All requests will be dealt with, wherever possible, within one month of receipt.

Additional Information for Residents of the United States

If you reside in the US, this section supplements the information contained in the Privacy Notice. US residents have specific rights regarding their personal data which are set out in applicable data protection legislation:

The California Consumer Privacy Act ("CCPA") became effective on January 1, 2020 and is supplemented by the California Privacy Rights Act ("CPRA") which became effective on January 1, 2023 (applicable to personal data collected from January 1, 2022) and created a variety of privacy rights for California consumers. Additionally, several other states have passed laws or are in the legislative process of extending similar privacy rights to their consumers.

Please note that in the preceding twelve (12) months, we have not sold your personal information.

We may disclose certain personal information, such as your first and last name, email address, job title/position, and other similar contact data, financial information, and employment details with our subsidiaries, affiliates and other third parties, including service providers who provide services on behalf of Crownpeak. When personal information is disclosed to a subsidiary, affiliate or other third party the recipient entity will be obligated to provide the same level of privacy protection required under applicable data protection legislation.

You have the following rights in relation to the processing of your personal information.

Personal Information Right	Description
Notice of and access to personal information	A right to notice of and access to certain information about our collection and use of your information.
Correction of personal information	A right to ask for inaccurate personal information to be corrected.
Deletion of personal information	A right to ask that we delete your personal information relating to you, subject to certain exceptions.
Objection to the sale of or sharing of personal information	A right to ask for your personal information to not be sold or shared with a third party, subject to certain exceptions.

To transmit personal information to another entity

A right to ask for your personal information to be transferred, in a readily useable format, to another entity.

None of these rights are absolute and there may be circumstances in which we are required or permitted under applicable law not to address your request.

Only you or an authorised agent (that you authorise to act on your behalf), may make a verifiable request related to your personal information.

Any verifiable request (including those to delete data) must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorised representative (such as by requiring you to provide a signed written authorisation that the agent is authorised to make a request on your behalf).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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

You may exercise your rights under applicable data protection legislation by contacting us. Please refer to the 'Contacting Us' section at the top of this Notice.