

PRIVACY NOTICE FOR APPLICANTS / CANDIDATES INSTART LOGIC, INC.

1. What is the purpose of this document?

Instart Logic, Inc. ("we" or the "**Company**") is a "data controller". This means that the Company is responsible for deciding how we hold and use personal data about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

2. Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

3. The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal data about you:

- the information you have provided to us in your application and cover letter;
- the information you have provided on our application form including, but not limited to, name, title, address, telephone number, personal email address, date of birth, gender, employment history, education history, and qualifications.
- any information you provide to us during an interview process, including work samples, results of coding tests.

We may also collect, store and use the following "special categories" of more sensitive personal data:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; and
- information about criminal convictions and offences.

4. How is your personal data collected?

We collect personal data about candidates from the following sources:

- you, the candidate;
- A recruitment agency through which you may have applied, from which we collect the following categories of data: job history, job application information.
- Accurate Background, our background check provider, from which we collect the following categories of data: employment history, education history, and information regarding criminal convictions and offences.
- your named referees, from whom we obtain a standard reference; and
- the following data from third parties is from a publicly accessible source: the job application and description itself is public data.

5. How we will use information about you

We will use the personal data we collect about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

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 data to decide whether to enter into a contract of employment or engagement with you.

Having received your application form and the results from any coding test which you took, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and carry out a criminal record and carry out any other check before confirming your appointment.

6. If you fail to provide personal data

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

7. How we use particularly sensitive personal data

We will use your particularly sensitive personal data in the following ways:

- We will use information about your health and disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview and/if you are hired.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. Data that the Company uses for these purposes will be collected on an anonymised basis. Candidates are entirely free to decide whether or not to provide such information and your application will not be affected either way.

8. Information about criminal convictions

We envisage that we will process information about criminal convictions for every role.

We will collect information about your criminal convictions history if we would like to offer you the position (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal records check in order to satisfy our PCI Compliance that there is nothing in your criminal convictions history which makes you unsuitable for the role.

- The role for which you have applied requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

9. Automated decision-making

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

10. Recipients of your personal data

We may disclose your personal data to members of our HR team, the relevant team managers in respect of the role you are applying for in order to take hiring decisions.

It may be necessary from time to time for us to disclose your personal data to third parties or agents, including without limitation to the following:

- third parties or agents of clients to assist in the administration, processing and management of certain activities pertaining to prospective employees including external reference agencies (such as employee vetting and screening agencies) and travel and expense management service providers;
- individuals or companies employed by the Company to carry out specific services, functions or consultancy work and other financial institutions;
- relatives or legal representatives of prospective employees;
- regulatory bodies to whom we are obliged or required to disclose information including Workplace Relations Commission, Courts and Court-appointed persons;
- relevant Government departments and agencies; and

- other support service providers necessary to support the organisation in the services listed.

Why might you share my personal data with third parties?

We will only share your personal data with the following third parties for the purposes of processing your application: [provide details, e.g. **search consultancy, other entity in the group**]. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

11. Transfer of personal data outside the EEA

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"), for the purposes described above. Those countries may not provide an adequate level of protection in relation to processing your personal data. Due to the global nature of our business, your personal data may be disclosed to members of our group outside the EEA, including in particular in the USA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers who act on our behalf. We will ensure appropriate safeguards are in place to protect the privacy and integrity of such personal data. You can obtain information concerning such safeguards from the HR team, where applicable.

12. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the HR team.

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

13. How long will you use my information for?

Successful applicants

If your application for employment or engagement is successful, personal data gathered during the recruitment process will be transferred to our HR management system and retained during your employment in accordance with our staff privacy and retention policies.

Unsuccessful applicants

If your application for employment or engagement is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process to the extent necessary to enable the Company to comply with any legal obligations or for the exercise or defence of legal claims (subject to any applicable legal or regulatory obligations to retain such information for a longer period).

It is likely that we will wish to retain your data for a further period of 12 months on the basis that a further opportunity may arise in future and we may wish to consider you for that. If so, we will write to you separately, seeking your explicit consent to retain your personal data for a fixed period on that basis – you do not have to consent to this, and you can withdraw your consent at any time thereafter.

At the end of that period (or if you withdraw your consent prior to this) we will securely destroy your personal data in accordance with our data retention policy.

In the event that any court actions or other legal proceedings are pending or impending, personal data will be deleted after termination of the court action or legal proceeding as appropriate.

14. Your rights in connection with personal data

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

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data 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 processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the HR team by email at this address hr@instartlogic.com.

15. Right to withdraw consent

When you applied for this role, you provided consent through the application process to us to processing your personal data 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 the HR team by email at this address hr@instartlogic.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 data securely.

16. Candidate Responsibilities

You should use all reasonable endeavours to keep us informed of any changes to your personal and special personal data. If you become aware of a data breach or a potential data breach in respect of personal data please report the matter immediately to the Human Resources Department by email at the following address: hr@instartlogic.com.

17. Data Protection Officer

We have appointed our security department to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the Security team by email at this address Infosec@instartlogic.com.

18. Complaints

You have the right to lodge a complaint with the UK's Information Commissioner's Office if you are unhappy with how your personal data is being handled.

19. Further Information

If you require any further clarification regarding this privacy notice, please contact the Company's HR team by email at this address hr@instartlogic.com.