

Cappfinity Limited Global Recruitment Privacy Notice

Effective from: 9th October 2023

Version 3.0

1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable data protection law such as (but not limited to) the UK GDPR. It is important that you read all of this Notice carefully as it sets out how Cappfinity Limited ("the Company", "we" or "us") handles your personal information when you apply for a job or other role with us and the rights you have in connection with that information. The term "applicants" is used in this Notice to refer to anyone who applies for a job role working with Cappfinity Limited, or who otherwise seeks to carry out work with or for us (whether on a permanent or non-permanent basis).

If you are in any doubt, or have any comments or questions about this Notice, please contact us using the contact details set out at Section 9 below.

2. Types of personal information we collect when you apply

Information that we collect automatically

You can visit the recruitment section of our website <https://www.cappfinity.com/careers> ("Website") and search for jobs without providing personal information. However, we do collect certain information automatically from your device when you visit our Website.

For further information, please see the privacy notice that applies to the use of our Website <https://www.cappfinity.com/global/wp-content/uploads/2021/03/Cappfinity-Privacy-Policy.pdf>

Personal Information collected from you

The types of personal information we collect and process when you apply for a role with Cappfinity Limited directly may include (but is not limited to):

- Identification data and contact details – including your name, address, email address, phone number and asking if you have a right to work in the region you are applying to work in.
- Employment history – such as previous employers and job titles/positions.
- Background information – such as academic/professional qualifications, job qualifications, education and employment references.
- Details of your nominated referees (including their name, contact details, employer and job role).
- Details of your immigration/visa status.
- Previous applications/roles (information relating to previous applications you have made to the Company and/or any previous employment history with the Company).
- Other information you voluntarily provide throughout the process, including through online assessments, telephone or video interviews, assessment centres / exercises and face-to-face interviews.
- Cappfinity does not record any interviews conducted by telephone or video.

As a general rule, during the recruitment process, we try not to collect or process any of the following: information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health/sex life ("Special Category Personal Information"), unless authorised by law or where necessary to comply with applicable laws.

However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Special Category Personal Information for legitimate recruitment-related purposes: for example, information about your disabilities for the purposes of reasonable adjustments for interviewing purposes, as well as equal opportunity purposes, to comply with anti-discrimination laws; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role. You may provide, on a voluntary basis, other Special category Personal Information during the recruitment process. If you have any questions or concerns to this you can contact us using our details below in section 9.

Personal information collected from other sources

- References provided by referees.
- Other background information provided or confirmed by academic institutions and training or certification providers.
- Criminal records data obtained through criminal records checks. (UK only)
- Information provided by background checking agencies and other external database holders (for example credit reference agencies).
- Information provided by recruitment or executive search agencies.

3. Purposes for processing personal information

We collect and use this personal information primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference checks or background checks (where applicable) and to generally manage the hiring process and communicate with you about it.

If you are accepted for a role at Cappfinity Limited, the information collected during the recruitment process will form part of your ongoing staff member record and will be processed in accordance with our Global Employee Data Privacy Notice.

If you are not successful, we may still keep your application or cv for up to 12 months from the date of your application to allow us to consider you for other suitable openings within Cappfinity Limited in the future, unless you request that we delete your application.

4. How does Cappfinity Limited process my personal information?

We may process your personal information as follows:

- your name, email address and contact details may be used to manage our communications with you;
- any personal information you provide in relation to a disability may be used to provide reasonable adjustments to any assessment that we provide to you;

- any responses you provide explicitly in response to an assessment question may be processed using automated decision making in relation to the scoring only of the assessment, and in relation to your progression in a selection and recruitment process, but your personal information in relation to name, email address, gender, ethnicity, age, social background or sexual orientation will never be used as part of automated decision making.

5. Who we share your personal information with and international transfers

We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

Transfers to other group companies

We may share your personal information with other members of the Company's Group in USA and Australia in order to administer our recruitment processes and store data (e.g. if the hiring manager may be based in the USA or Australia). We have a Group Data Sharing Agreement in place containing the required provisions to ensure your personal data is protected when shared with other group entities.

Transfers to third party service providers

We may make certain personal information available to third parties who provide services relating to the recruitment process to us, including:

- background checking or other screening providers and relevant local criminal records checking agencies, e.g. KnowYourCandidate (UK only);

Where we need to transfer or store your personal data outside the European Economic Area (the "EEA") or the UK, we will take appropriate steps to ensure that the Personal Data processed outside the

UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or

We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary.

6. Lawful basis for processing personal information

Under UK and European data protection law (UK GDPR and EU GDPR), our lawful basis for processing your personal information as part of the recruitment process is:

- Legal obligation; to comply with applicable immigration and/or employment laws and regulations;
- Contractual obligation; to take steps prior to entering an employment contract with you, where you are considered for employment;

If you have questions about or need further information concerning the lawful basis on which we collect and use your personal information, please contact us using the contact details provided in Section 9 below.

7. Data retention periods

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally, this means your personal information will be retained for a period of 12 months after confirmation that your application was unsuccessful, unless you request that we delete your application.

8. Your data privacy rights

You may exercise the rights available to you under applicable data protection laws as follows:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided below.
- You have the right to complain to a data protection authority about our collection and use of your personal information. You can submit a complaint directly to the ICO via this link <https://ico.org.uk/make-a-complaint/>. For other EEA data protection authorities, see this link https://edpb.europa.eu/about-edpb/board/members_en.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Our Data Subject Rights Management Policy is available for you to view on our website.

9. Contact details

Please address any questions or requests relating to this Notice to the Cappfinity Limited HR team (email: HR@cappfinity.com) or the Cappfinity Limited Data Protection Officer.

The Cappfinity Limited Data Protection Officer can be contacted here - by email: dpo@cappfinity.com

OWNER	Compliance Analyst
APPROVER	Finance Director
CLASSIFICATION	Internal Use Only
DATE OF ISSUE	October 2023
ISSUE	v3.0
REASON FOR ISSUE/UPDATE	Annual Review
LAST REVIEW/UPDATE	October 2023
NEXT REVIEW	October 2024
DISTRIBUTION	All Cappfinity Employees

VERSION	AUTHOR	SUMMARY OF CHANGES	DATE
2.0	Evalian Limited	Second Version	June 2022

3.0	Evalian Limited	Third version	October 2023
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Document Release:

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