

## CloudMargin – Candidate Privacy Policy

### 1. Purpose

CloudMargin Limited and its subsidiaries (“CloudMargin”) are committed to protecting your Personal Information when you are interested working, or apply to work at CloudMargin. This Privacy Policy and Notice (“Policy”) describes CloudMargin’s collection, use, disclosure, transfer and storage of your personal information as part of a position application, recruitment process or registration for job alerts via our careers webpage.

### 2. Who are we?

CloudMargin Limited and its subsidiaries (“CloudMargin”) are committed to protecting the personal information that CloudMargin obtains through our recruitment and hiring processes. When applying for a position with CloudMargin, you will be applying for a position with one entity of CloudMargin, the details of which will be provided to you as part of the recruitment and hiring process.

The company of CloudMargin that is your prospective employer is the data controller of your personal information with respect to your application (the “Company” or “we”, “us”, “our”).

Although CloudMargin aims for consistency in our recruitment activities, differences in the applicable law across the various jurisdictions where we operate may mean that this is not always possible. We will process your personal data in accordance with this Policy unless to do so would not be permitted under applicable local law.

CloudMargin may update this Policy from time to time and will post the most recent version online. We recommend that you review this Policy regularly to keep up to date with any such changes.

### 3. What types of personal information does CloudMargin process?

Subject to applicable law, the Company may process the following types of personal information collected from you (either from the application or as part of the interview process) or other sources, when you register for job alerts on our careers page, or during the recruitment process. The other sources from whom we may collect personal information may include an employee of CloudMargin that has referred you and other third parties where relevant to your application; for example where we are provided with: (i) an employment reference from a former employer or professional body; (ii) confirmation of your immigration status; or (iii) a criminal background check from the relevant authority in that jurisdiction.

Type of information	Source(s)
Information related to your identity such as name (legal and preferred), contact details (including address, country of residence, email, and phone number)	You Employment search firms and other employment or technology service providers Public websites or social media sources (e.g., LinkedIn) where permitted by applicable law
Immigration or visa status such as work authorization status, current/future work sponsorship requirements, your work permit and other documentation we are required or permitted to collect by law to verify your immigration status and your right to work in the jurisdiction where you are applying for a position	You Employment search firms
Nationality	You Employment search firms
Citizenship Status	You Employment search firms
City / Country of Birth	You Employment search firms

Date of Birth	You Employment search firms
Gender / Gender identity	You Employment search firms
National identifiers or identity documents such as your passport number or other government identification number, your ID card or driver's licence	You Identity verification services
Marital or Familial Status	You
Military service / Veteran status	You
Disability status (e.g., where you request accommodation) or any other health data that we may need to be provided with in order to accommodate any special requirements you might have or adjustments you may need to attend interviews or to comply with our statutory workplace or insurance obligations	You Employment search firms
Race/Ethnicity	You
Resume/CV, cover letter, professional and work experience (including your current company, department, location, dates of employment, title), educational background, details of your qualifications, other relevant skills or experiences that you have, such as languages, and any other career data	You Employment search firms and other employment or technology service providers Public social media sources where permitted by applicable law (e.g. LinkedIn) Employee referrals/references
Results from assessments, evaluations, or other reviews conducted as part of the recruitment process	You Employment search firms and other employment or technology service providers
Criminal conviction	You Background check providers
Current compensation and expectations	You Employment search firms
Third party references, including information about your referees and their observations	You Employment search firms
Photos	You

If we obtain personal information from third parties, we will take reasonable steps to confirm that such personal information was collected lawfully where required to do so by applicable law.

Some personal information which we collect, where required or permitted by applicable law or where you have given us your consent to do so (which can be withdrawn at any time), may also be considered sensitive information or special category data under applicable law in relevant jurisdictions.

If you provide us with personal information about other individuals (such as individuals listed as references), it is your responsibility to inform such individuals of their rights and to obtain their consent, where necessary under applicable law, to the processing (including transfer) of that personal information for the purposes set out in this Policy.

#### 4. Why does the Company process my personal information?

We process your personal information to administer our recruitment activities, including to:

- Assess your suitability for the position for which you apply based on the information you have provided to us as part of your initial application, during interviews and/or from any further assessments you have undertaken as part of the recruitment process; and, in accordance with applicable law, to assess your suitability for other open positions and to make hiring decisions, including in connection with assessment or evaluation services provided by third-parties;
- Maintain and review our equal opportunity profile and support our diversity and inclusion efforts, in accordance with applicable law (including any applicable equality, diversity and discrimination legislation);

- Meet our obligations with respect to any health and safety requirements or security obligations in the relevant jurisdiction where you are applying for a position, including when you might visit our premises for interviews or assessments and require accommodation;
- Take further steps to enter into an employment contract with you; for example, communicating offers of employment to you where you have been successful in a recruitment process and informing you of current and future career opportunities as permitted by applicable law;
- Communicate with you to facilitate, manage and improve our recruiting and hiring processes, administer on-boarding activities and maintain employment records. This may include discussing your application further, inviting you to interviews, post-recruitment process follow-up, and providing you with feedback;
- Verify your right to work in the jurisdiction of the position for which you have applied; and
- Authenticate your identity and conduct or obtain reference and background checks or criminal record checks to the extent required or permitted by applicable law. Data relating to your criminal conviction history will only be collected : (i) where we have made a conditional offer of employment that is subject only to background checks; and (ii) where such checks are permitted by applicable law, providing for the appropriate safeguards for your rights and freedoms as a prospective employee.

## 5. What is the Company's legal basis for processing my personal information?

Depending on the law applicable to your personal information, your personal information may be processed on the basis of one or more of the following legal grounds:

- we have requested and been given your explicit consent (your consent can be withdrawn at any time by contacting us using the details below);
- processing your personal information is necessary for our (or a third party recipient's) legitimate interests (including our legitimate human resources and business management interests) in facilitating recruitment, evaluation, and hiring processes, in particular: the interview process and communicating with you; making informed recruitment decisions and selecting suitable candidates for roles with us; performing background checks through service providers (such as criminal, to the extent relevant and permitted and, where necessary, also with your consent); improving our recruiting and hiring processes and applying industry best practices;
- to take steps at your request prior to entering into a contract with you (for example, where you have accepted an offer of employment and we need to take steps in accordance with the agreement that require processing of your personal data);
- the processing of your personal information may also be necessary for us to comply with legal or regulatory requirements (in particular with respect to maintaining records, applicable equal opportunities monitoring and reporting obligations and verifying your right to work in the relevant jurisdiction where required by authorized authorities); and
- if you are in a jurisdiction where legitimate interest is not a ground for processing, either at all or in respect of particular categories of personal information, we will process your personal information as required or permitted by law, including based on your consent where required or permitted by applicable law.

Our ability to process or evaluate your application will be limited if we do not process your personal information.

## 6. When and why will the Company share my personal information?

*Within CloudMargin:*

Your personal information may be disclosed to our human resources, finance and administration functions and other relevant personnel, such as interviewers involved in the recruitment process, managers in the business area with a vacancy, and IT and compliance/legal department personnel, for recruitment, compliance, administrative and management purposes as described in this Policy.

*Service providers:*

We may share your personal information with recruitment, assessment, on-boarding and administration service providers, background check providers, and hosting, cloud and other technology services providers on a need to know basis in accordance with applicable law. For example, we may provide your name and email address to our service providers engaged in candidate role matching and recommendations, including based on behavioral assessments, or resume reviews, where such assessments are applicable for the role to which you have applied. We require that these service providers protect your personal information in accordance with applicable law.

#### *Third parties:*

We may share your personal information with other third parties, for example in the context of the possible sale or transfer of all (or a portion) of our business or assets to a third party in the event of merger, acquisition, liquidation or similar event, or to relevant third parties such as auditors, lawyers or professional advisors, our insurers in accordance with applicable law. If required by law in a particular jurisdiction, we will require that third party continue to comply with this Policy or obtain your consent again.

Sometimes we may share your personal information without your consent where permitted or required under applicable law, including where service providers assist us in the processing of your personal information described in this Policy. We may need to disclose your personal information to comply with a subpoena, bankruptcy proceedings, or similar legal process, or in response to lawful requests by public, regulatory or government authorities, or when disclosure is reasonably necessary to protect our property or rights, or those of you or third parties, or the public at large. We may also share your personal information as permitted by law for the establishment, exercise, or defence of legal claims. In some jurisdictions, we may also process your personal information if it has already been publicly disclosed by you.

There may be other circumstances where we disclose your personal data when you have given us your consent to do so (which you can withdraw at any time by contacting us on the details below).

We will not sell or disclose your personal information collected in accordance with this Policy to a third-party non-vendor for monetary or other valuable consideration unless permitted by this Policy or applicable law.

## **7. Do you transfer personal information between jurisdictions?**

Yes. CloudMargin is a multi-national group with headquarters in London, United Kingdom. We may process your personal information outside of the jurisdiction in which it was collected for the purposes set out in this Policy, including within the CloudMargin group globally and with service providers outside that jurisdiction. Where your personal information is transferred to a jurisdiction without adequate privacy laws, CloudMargin has policies and procedures to put measures in place to protect the personal information that is transferred in accordance with applicable privacy laws (such as the Standard Contractual Clauses released by the European Commission). You may obtain a copy by using the contact details below.

## **8. How do you protect my personal information?**

We adhere to applicable data privacy laws and have appropriate security measures (including physical, electronic, and procedural safeguards) designed to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. However, the security of information can never be guaranteed. In the event of a serious security incident, where required by applicable law, we will notify you and report to applicable regulators.

We limit access to your personal information to those employees, agents, contractors, service providers and other third parties who have a business need to know and are subject to confidentiality obligations.

## **9. What happens to my personal information if my application is successful?**

If your application is successful, personal information processed during the recruitment process will be added to your employee record and processed in accordance with CloudMargin's employee privacy policy. You will be

provided with access to a copy of that policy at the time of accepting your offer of employment and at any time on our intranet after you start with us.

## **10. How long will you keep my personal information if my application is unsuccessful?**

We will retain your personal information for as long as necessary to review your application, or, to the extent applicable, until you have withdrawn your consent, and for an additional period as is necessary for the purposes described in this Policy (for example where you have requested that we consider you for any upcoming vacancies).

## **11. How can I access or correct my personal information, request that it be deleted, or ask for it to be transferred to another organization?**

At any time, you may request:

- access to your personal information (commonly known as a “data subject access request”) and information regarding your personal data including the personal information that is processed by us, how it was collected and for what purposes;
- that we update or correct any errors in your personal information;
- erase all or part of your personal information if there is no legal basis for the processing of such data, or if the legal basis has ceased to apply and subject to our data retention obligations;
- that we restrict the processing of your personal information when you have asked us to check its accuracy and in other cases to the extent that such request does not conflict
- with a legal requirement or obligation to process your personal data, or an overriding legitimate interest we have to process your personal data;
- to export a copy of your personal information in a format that allows you to reuse your data;
- to ask for human intervention if a recruiting or hiring process involves an automated decision; and/or
- closure of your account (if an online account is created).

Furthermore, you may object to the processing of your personal information where the processing is based on a legitimate interest to the extent that such request does not conflict with a legal requirement or obligation to process your personal data, or an overriding legitimate interest we have to process your personal data.

You may withdraw your consent to future processing at any time (if applicable) by contacting using the details provided below.

You may also have the right not to be discriminated against for exercising any of the above rights.

Depending on which laws apply to your personal information, we may only do some of these things for you. If we refuse your request, we will explain your legal rights, the reason for our refusal and any recourse you may have.

Please contact our team if you have a question or request for us at [HR@cloudmargin.com](mailto:HR@cloudmargin.com). We will respond to your request within 30 days or earlier if we can or are required to do so by applicable law.

## **12. How can I make a complaint about the handling of my personal information or response to my request to exercise my rights?**

If you have a concern about our privacy practices, including the way we handled your personal information, you may report it to the Chief People Officer at [HR@cloudmargin.com](mailto:HR@cloudmargin.com), Data Protection Officer at [legals@cloudmargin.com](mailto:legals@cloudmargin.com) or 4-8 Whites Grounds, London, SE1 3LA, United Kingdom, or to the data protection authority that is authorized to hear those concerns.