



## **Job Applicant Privacy Notice**

### **Scope and Overview**

This Privacy Notice describes how Suveto LLC, and its subsidiaries located in California (“Suveto”, the “Company”, “we” or “us”) collect and process personal information about California Residents during the application and recruitment process.

This Privacy Notice applies solely to job applicants of Suveto who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this notice.

This Privacy Notice describes the categories of personal information that we collect, how we use your personal information how we secure your personal information, and when we may disclose your personal information to third parties.

We will only process your personal information in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

### **Collection of Personal information**

For purposes of this Privacy Notice, personal information means any information about an identifiable individual collected in connection with the recruitment process. Suveto may collect personal information directly from you, as a job applicant, or may receive personal information from third parties, for example, in connection with a background, employment, or reference check, subject to your consent where required by law. Personal information excludes anonymous or de-identified data that is not associated with a particular individual.

We may collect, store, and process the following categories of personal information in connection with our recruiting activities:

At the initial stages of recruitment, we may collect, hold and use the following types of personal information about you:

- Information contained in your application form/resume/cover letter, including your name, title, contact details, employment history, experience, skills, qualifications/training (including educational, vocational, driving licenses where appropriate), referees’ names and contact details, etc.
- Publicly available information about you, such as your business social media presence (including any of photographs of you posted to such site(s)).
- Selection information, including correspondence, interview notes, internal notes, the results of any written or online selection tests.
- Equal opportunities monitoring data which could include information about your race or ethnicity, religious beliefs, sexual orientation, or health. We only use this information to monitor equality of opportunity and diversity in our recruitment process.

- Information relevant to any request by you for accommodations to the recruitment process as a result of an underlying medical condition or disability. We may use this information to enable us to carry out a fair, non-discriminatory recruitment process by considering/making reasonable adjustments to our process as appropriate.
- Any additional personal details that you otherwise voluntarily provide to us.

If you receive a conditional offer of employment, we may collect, hold, and use the following additional types of personal information about you:

- Pre-employment check information, including references and verification of qualifications.
- Right to work checks and related documents.
- Medical test results.
- Driving test results/driver motor vehicle records (if applicable to proposed line of work)
- Information about your health or mental state in a pre-employment medical questionnaire and/or examination, as well as any information about underlying medical conditions and adjustments that you have brought to our attention. We use this information to assess whether you are fit to do the job with adjustments, to consider/arrange suitable adjustments and to comply with health and safety requirements.
- Criminal records information (if applicable to your line of work). We use this information to assess your suitability for the role and verify information provided by you.
- Any additional personal details that you otherwise voluntarily provide to us (including personal information provided on your resume).

### **Use of Personal information**

We only process your personal information where applicable law permits or requires it in connection with carrying out our application and recruitment process. We may process your personal information for the following legitimate business purposes:

- Identifying and evaluating job applicants, including assessing skills, qualifications, and interests.
- Verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.
- Communicating with you about the recruitment process and your application.
- Keeping records related to our hiring processes.
- Creating and submitting reports as required by applicable laws or regulations.
- To comply with our legal, regulatory, or other corporate governance requirements.
- Analyzing and improving our application and recruitment process.
- Complying with applicable laws, regulations, legal processes, or enforceable government requests.
- To protect the rights and property of Suveto, other job applicants, employees, or the public, as required or permitted by law.

In addition to using your personal information for the position for which you have applied, we may retain and use your personal information to inform you about and consider you for other positions that may be appropriate for you. If you do not want to be considered for other positions or would like us to remove your personal information, you may contact our data protection officer in writing or by e-mail.

We will only process your personal information for the purposes for which we collected it. If we need to process your personal information for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent.

We may process your personal information without your knowledge or consent where required by applicable law or regulation.

We may also process your personal information for our own legitimate interests, including for the following purposes:

- To prevent fraud.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- To support internal administration with our affiliated entities.
- Where we have a legitimate need to process your personal information for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

### **Data Sharing**

We do not sell, rent, or otherwise disclose personal information we collect to third parties for monetary or other valuable considerations. We will only disclose your personal information to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the recruitment process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal information consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes in accordance with our instructions.

We may also disclose your personal information for the following additional purposes where permitted or required by applicable law:

- To a recruiting firm to assist in our recruiting efforts.
- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to administer the application and recruitment process.
- As part of our regular reporting activities to other members of our group of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal information necessary for the specific purpose and circumstances.
- To protect the rights and property of Suveto.
- During emergency situations or where necessary to protect the safety of persons.
- Where the personal information is publicly available.
- For additional purposes with your consent where such consent is required by law.

### **Data Security**

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal information against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal information to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

## **Data Retention**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

If you are offered and accept employment with Suveto, the personal information we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal information policies. If you do not become an employee, or, once you are no longer an employee of Suveto, we will retain and securely destroy your personal information in accordance with our document retention policy and applicable laws and regulations.

## **Notification**

We only ask you to provide personal information that we need to enable us to decide whether to offer you a role. If you do not provide information to us, then we will have to decide on whether to offer you a role without that information, which in some cases could result in us deciding not to recruit you. If you do not provide us with names of referees or a reference when asked, we will not usually be able to offer you the role. In addition, some of the personal information you provide to us is required by law. For example, if you do not provide us with the documentation, we need to check your right to work, then we cannot by law employ you.

If you choose not to provide us with personal information requested, we will tell you about the implications of any such decision at the relevant time.

## **Inquiries, Concerns or Complaints**

If you have any questions about this Privacy Notice or concerns about how we manage your personal information, please contact Suveto's Human Resources department (at [hr@suveto.com](mailto:hr@suveto.com)). We will answer your questions and advise you of any steps taken to address the issues raised by you.

## **Changes to This Privacy Notice**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any updates. If we would like to use your previously collected personal information for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal information for a new or unrelated purpose. We may process your personal information without your knowledge or consent where required by applicable law or regulation.

Effective Date: November 15, 2021