

## **Infineum Job Applicant Privacy Notice**

As part of any recruitment process, [Infineum](#) (“Infineum”, “we”, “us”, “our”) collects, uses, discloses, and otherwise processes Personal Information relating to individuals who apply for a job at Infineum (“you”, “your”). For the purposes of this Privacy Notice, “Infineum” means the employing entity to which you are applying for employment and, where the context so requires, will include any affiliates. That company shall be the controller of your Personal Information and can be contacted by emailing [Privacy@Infineum.com](mailto:Privacy@Infineum.com) or via the relevant contact details under specific jurisdictions.

Infineum is committed to being transparent about how it collects and uses Personal Information collected during a job or Internship application process (either online or offline) or through our Career Section of our website.

### **Additional Notices**

If you are a resident of Brazil, please contact us at [Privacy@infineum.com](mailto:Privacy@infineum.com) for the "Additional Information for Brazil" ("Brazil Addendum") for additional information regarding the Personal Information we collect and use, as well as the rights you have under Applicable Laws.

If you are a California resident, please contact us at [Privacy@infineum.com](mailto:Privacy@infineum.com) for “Additional Information for California Residents” for additional information regarding the Personal Information we collect and use and the rights you have under California Privacy Laws.

If you are a resident of Mainland China, India, Japan, Singapore, or South Korea, please contact us at [Privacy@infineum.com](mailto:Privacy@infineum.com) for “Additional Information for Asia Pacific” (“APAC Addendum”) for additional information regarding the Personal Information we collect and use and the rights you have under Applicable Laws.

In the event anything in one of these Additional Notices conflicts with this Privacy Notice, the Additional Notice will prevail.

## **Definitions**

“Affiliates” means any member of the [Infineum group of companies](#). Infineum values your trust and is committed to the responsible management, use and protection of your Personal Information.

“Personal Information” means information relating to an identified or identifiable natural person, including any Personal Information or Personal Data as defined under Applicable Laws.

“Applicable Laws” means the applicable privacy and data protection legislation in your jurisdiction.

## **What Personal Information do we collect?**

The Personal Information Infineum collects about you varies based on your relationship and application process with us. This may generally include:

- your name, address, and contact details, including email address and telephone number,
- CV, details or copies of your qualifications or certifications, education history, skills, experience, and employment history,

- information about your current level of remuneration, including benefit entitlements,
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process,
- national identifiers such as, details from your passport, identity documents or other information about your entitlement to work in the country you are applying.
- online account information to access any careers site.
- performance and evaluation data, such as personal and analytical tests in connection with recruitment process.
- on premise monitoring of our offices and work environment (images and video) at internal and external access points and communal areas in accordance with Applicable Laws. This is for health and safety and to prevent unauthorised access.

We collect your Personal Information in a variety of ways. For example, directly from you, from a third party, including without limitation parties that you have directed us to, from service providers acting on our behalf, for example companies that conduct background checks, or from publicly available sources.

Personal data about candidates or individuals whose skills and experience appear relevant to current or future employment opportunities may be obtained through third party agencies, professional networking and recruitment platforms. Certain features in these tools may use artificial intelligence to assist recruiters with administrative tasks and communications.

We will seek information from third parties, such as previous and current employers for references, however, only once a conditional job offer to you has been made and will inform you that we are doing so.

Please see the section on “Who has access to your data” which contains information regarding the safeguards employed if your data is transferred outside of your jurisdiction.

### **Why do we process your Personal Information?**

Infineum will process your Personal Information in the EU and the UK, and where otherwise required, for the purposes and on the legal bases outlined below:

**Legal obligations** - In some cases, we need to process Personal Information to ensure that we are complying with our legal obligations such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, social security and tax laws, environmental regulations, workplace safety laws and regulations, and other Applicable Laws, regulations, opinions and guidance. For example, we are required to check a successful applicant's eligibility to work in the applicable country before employment begins, or process your Personal Information for auditing, accounting and corporate governance purposes, including relating to financial, tax and accounting audits, and audits and assessments of our business operations, security controls, financial controls, or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.

**Consent** - Infineum may ask for your explicit consent to process Personal Information in exceptional cases or if no other legal ground can be applied (or otherwise where required to do so by Applicable Laws). We may ask for your explicit consent to process your sensitive Personal Information or for future recruitment (or otherwise where required to do so by Applicable Laws). Such consent is your choice and is entirely voluntary. For example, we may process your Personal Information in support of our equal opportunity employment policy and practices.

**Legitimate interests** - We have a legitimate interest in processing Personal Information during the recruitment process and for keeping records of the process. Processing such data from job applicants includes the following purposes:

- reviewing, assessing, recruiting, evaluating, considering, or otherwise managing the application and recruitment process; scheduling and conducting interviews; reviewing, assessing, and confirming information provided and a candidate's suitability for employment and decide to whom to offer a job; extending offers, negotiating the terms of offers, and assessing salary and compensation matters,
- communicating with you regarding your application(s) and about other similar position(s) in which you may be interested as well as maintaining your applicant information for future consideration,
- relating to the organization and operation of our business and our performance of services to clients, including related to auditing and assessing performance and business operations, including client services and associated activities,

- for planning, due diligence and implementation of commercial transactions, for example mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions.

**Vital interests** - We process your Personal Information to protect vital interests for the purpose of detecting and preventing fraudulent or illicit activities that impact a person's vital interest or public safety. The processing is also necessary for the response to public health emergencies, or for the protection of life, health, and property safety of natural persons in emergencies. We may process your Personal Information to protect the vital interest of you and others if we have valid reasons to believe that such processing of your Personal Information may prevent or reduce any significant potential harm to you or others.

**Defending legal claims** – We may also need to process Personal Information from job applicants to respond to and defend against legal claims. For example, in order to defend our rights and interests and those of third parties, including to manage and respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.

In limited cases, we process health information for purposes of making reasonable adjustments to the recruitment process for applicants who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.

We will only process special categories of sensitive Personal Information where we have a legal obligation to process such data or if we have received your explicit consent to do so. Some sensitive Personal Information such as diversity data is generally voluntary, except where required by local law.

### **How long will we keep your data?**

Where your application is successful, any Personal Information we require for your employment will be transferred to a personnel file. Any Personal Information not required for your employment that has been collected during the recruitment process shall be kept for up to three (3) years following the recruitment process, depending on whether you consent (*if consent is required*) and or in accordance with local laws.

Where your application is unsuccessful, we will normally keep your Personal Information until the recruitment process has been concluded, and or up to three (3) years thereafter to satisfy the need to use such Personal Information in the event of a claim (e.g., on grounds of discrimination) and or as per local retention laws.

Depending on your region, we will seek your consent to keep your Personal Information on file longer for up to three (3) years in case there are future employment opportunities for which you may be suited. Should you wish to know more about how long we will retain your Personal Information for your region, please contact us on [Privacy@infineum.com](mailto:Privacy@infineum.com). If consent has been given to store Personal Information for future recruitment needs, it will be stored until a future recruitment of the applicant is no longer relevant and/or until such consent has been withdrawn. You are free to withdraw your consent at any time

by contacting [Privacy@Infineum.com](mailto:Privacy@Infineum.com). Please note this does not affect the validity of the processing on the basis of consent before the withdrawal. Such withdrawal can only be made where the basis for processing of the Personal Information is consent, we may be required to hold Personal Information e.g., to comply with legal obligations even once consent has been revoked.

### **How we disclose your Personal Information?**

Your application information and Personal Information will be disclosed internally for the purposes of the recruitment exercise. This includes for example (without limitation) members of the Human Resources and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access is necessary for the performance of their role.

We may disclose your data with your former employers to obtain references for you, any medical providers, any employment background check providers to obtain necessary background checks and any relevant authorities to obtain necessary criminal record checks, if applicable.

We may transfer your Personal Information to countries outside your jurisdiction including the US or where we have service providers or operations. These may include countries that may not offer the same level of data protection standards as your local laws. In these cases, we will carry out the transfers in accordance with the requirements of the Applicable Laws to ensure security of the data processing. For job applicants based in the UK or EEA, the transfer to other countries is pursuant to Applicable Laws, we will ensure that they offer an adequate level of protection, e. g. by entering into Standard Contractual Clauses

and conducting assessments for the transfer of Personal Information. You can contact us via [Privacy@Infineum.com](mailto:Privacy@Infineum.com) to obtain a copy of the appropriate safeguards we have put in place.

### **How do we protect your Personal Information?**

We take the security of your Personal Information seriously. We take appropriate measures designed to ensure that your Personal Information is not lost, accidentally destroyed, misused, or disclosed, and is not accessed in an unauthorized manner. Unfortunately, data processing cannot be guaranteed to be 100% secure, so if you have reason to believe that your interaction with us is no longer secure, please immediately email [Privacy@infineum.com](mailto:Privacy@infineum.com).

Infineum disclaims, as far as permitted by Applicable Laws, any liability for itself and its affiliates and contractors for any Personal Information collected by us in connection with your application that is lost, misused, illegally accessed, disclosed, altered, or destroyed or not processed as intended.

### **Your Personal Information rights**

As a data subject, you may have a number of rights under EU/UK privacy and data protection laws, and where otherwise required under Applicable Laws, which may include:

- access and obtain a copy of your Personal Information on request,
- require us to change incorrect or incomplete Personal Information,
- require us to delete or stop processing your Personal Information, for example where the Personal Information is no longer necessary for the purposes of processing,

- object to the processing of your Personal Information where we are relying on legitimate interests as the legal ground for processing,
- ask us to stop processing Personal Information for a period if the data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data, and
- to request a copy of your Personal Information in a machine-readable format and this copy can also be transmitted to a third party on your request.

Please note, however, these rights are not absolute, if you would like to exercise any of these rights, please contact us at [Privacy@Infineum.com](mailto:Privacy@Infineum.com).

If you are a California resident, please see the Section “Additional Information for California Residents” for additional information regarding your privacy rights under California privacy laws.

If you are in Asia Pacific, these rights are set out in the APAC Addendum.

If you are a resident of Brazil, please refer to the Brazil Addendum for additional information about your privacy rights under the Brazilian General Data Protection Law (LGPD).

### **What if you do not provide us with your Personal Information?**

You are under no statutory or contractual obligation to provide Personal Information to us during the recruitment process. However, if you do not provide certain information, we may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job

offer that you provide evidence of your right to work in the respective country and satisfactory references. You are under no obligation to provide information for equal opportunities monitoring purposes unless required by Applicable Laws, and there are no consequences for your application if you choose not to provide such information.

### **Automated decision making and profiling**

We may use automated tools to assist us in processing and evaluating job applications. You will be notified of this to have the opportunity in having automated decisions reviewed by the member of the Infineum recruitment team.

### **Contact information and complaints**

Should you wish to raise a complaint about how Infineum processes your Personal Information, you may contact us by emailing [Privacy@infineum.com](mailto:Privacy@infineum.com). You also have the right to lodge any complaints you may have regarding Infineum's processing of your Personal Information to a supervisory authority for your country or region.

### **Changes to this Notice**

Infineum encourages the periodic review of this Privacy Notice to stay aware of any changes to it. We reserve the right to amend this Notice time to time. If we make changes to this Privacy Notice that materially affect our processing of the Personal Information, we have previously collected from you, we will notify you by email or by prominently posting a notice on this website, and we will obtain your consent where required to do so by Applicable Laws.

***For translations***

*This translation is for reference only and in the event of any conflict with the English version, the English version will prevail.*

Effective Date: June 2023