

Paramount Commerce - Recruitment Privacy Notice

Paramount Commerce and its subsidiaries and affiliates from time to time (together "**Paramount Commerce**") is committed to protecting the privacy and security of your personal information. For the purposes of this privacy notice (this "**Notice**"), personal information is any information about an identifiable individual, and does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

For the purpose of the General Data Protection Regulation ("GDPR"):

- Paramount Commerce is the data controller when collecting personal data for the purpose of recruitment.
- A job applicant is the data subject.
- Third parties shall be the data controller of personal data and shall be responsible for complying with all applicable law in respect of the use of that data following its transfer by Paramount Commerce.

This Notice explains how we handle your personal information as a job applicant ("**Recruitment Data**") and explains the rights that you have under applicable data protection legislation and all similar or related legislation (the "General Data Protection Regulation ("GDPR"). This Notice applies to applications submitted via our website and third parties, such as recruitment agencies and job boards. It also applies to applications submitted via other means, such as by post and email. All current third parties are GDPR compliant.

Paramount Commerce is also referred to in this Notice as "**we**", "**us**" or "**our**".

We will only process your Recruitment Data where we have a legal basis for doing so (including because it is necessary to comply with a legal obligation or to enable us to pursue our legitimate business interests). Generally, we will be processing it to understand our applicants in sufficient detail so we can operate an effective recruitment process and to help us to decide whether to enter into a contract of employment with you. At other times, we will be processing your Recruitment Data because you have consented to us doing so. You can withdraw such consent at any point.

1. WHAT RECRUITMENT DATA DO WE COLLECT?

We collect various types of Recruitment Data and much of it will have been provided by (a) you or (b) from third parties such as recruitment agencies. Such data will be used to assess you for the position for which you have applied. This may include the following categories of data:

- **Application information:** This information will generally tell us who you are and help build a picture of your capabilities and suitability for certain positions. This type of information may include your name, contact information, current company, information contained in your CV/resume (e.g. professional qualifications, previous employment history, place of residence, personal interests and experiences), information contained in your social media accounts or personal websites or accounts (e.g. LinkedIn or Twitter), information about the type of work and projects you have been involved with and any other information you may wish to provide to us as part of your application.
- **Recruitment process information:** This is information collected as a result of the recruitment process, such as your performance at assessment centres or interview and information provided by your referees. Need to know and least privilege principles are followed by the employees to access applicant's data.
- **Future opportunities information:** This is information collected in order to keep in touch with you about future job opportunities at Paramount Commerce, such as your name, email, LinkedIn profile.
- **Careers website information:** This is information related to your use of our careers website, for example your IP address. This information may be collected using cookies and similar technology.

We will indicate where the information we have requested is mandatory or optional. We will also explain the consequences should you decide not to provide information which we have indicated is mandatory. In some circumstances this may mean we are unable to process your application.

2. WHAT WILL WE DO WITH YOUR RECRUITMENT DATA?

Paramount Commerce may need to process Recruitment Data to enter into a contract with you and fulfil its obligations under that contract. In some cases, Paramount Commerce needs to process Recruitment Data to ensure that it is complying with its legal obligations, or for legitimate business interests. Specifically, the main purposes for which we use your Recruitment Data include:

- **Supporting and Processing your Application**, for example, so we can assess your ability to meet the job specification, in order to shortlist applicants and to verify references and professional qualifications provided by applicants.
- **Security Management**, for example to ensure the security of our premises, assets, information, employees and other personnel.
- **Legal and Regulatory Compliance**, for example to ensure compliance with health & safety requirements and other legal or fiscal obligations, or in connection with litigation or an internal investigation or audit and to ensure compliance with our policies regarding anti-money laundering, bribery and corruption, as well as equal opportunities monitoring.

We may verify the Recruitment Data you provide during the recruitment process and/or collect personal data about you from third party sources to assist with our “**Pre-Employment Checks**”. If this occurs, you will be told in advance which aspects of your Recruitment Data will be verified including an explanation of how the Pre- Employment Checks will be carried out (for example, contacting your referees.).

3. WHO IS YOUR RECRUITMENT DATA DISCLOSED TO?

(a) Within Paramount Commerce

We restrict access to Recruitment Data to people within our group of companies who have a “need to know” such information. For example, certain individuals within Paramount Commerce, including individuals in the HR and IT teams, may have access to your Recruitment Data if access to such Recruitment Data is necessary for the performance of their roles, for example in order to process your application and manage the recruitment process (this may include, for example, individuals in our HR team, individuals who are involved in the interview process and individuals to whom you would report if your application is successful).

(b) Outside Paramount Commerce

We may share Recruitment Data with authorised third party service providers to conduct and manage the recruitment process. For example, we may share your Recruitment Data with such service providers in order to conduct screening and verification of your application and the information you have provided to us. This may include verifying academic and professional qualifications. We will only disclose your Recruitment Data to our suppliers and other third parties where necessary and where permitted by Data Protection Legislation.

4. HOW LONG WILL WE RETAIN YOUR RECRUITMENT DATA?

We keep your Recruitment Data in accordance with our internal retention policies and procedures. Typically, if you are unsuccessful in your application with us (or if you reject the position), we will keep your Recruitment Data for six (6) months unless we have your permission to keep your Recruitment Data on file so that we may contact you again if another suitable position arises – in this situation we will retain such Recruitment Data for one (1) year.

5. WHERE DO WE STORE YOUR RECRUITMENT DATA?

Applicants in the European Economic Area (the “**EEA**”) should be aware that their Recruitment Data may be transferred to, and stored at, a destination outside the EEA. Applicant’s recruitment data is stored in the US, UK, and EU.

Paramount Commerce may transfer your Recruitment Data to countries outside the EEA for the purposes identified above, and will do so only upon receipt of assurances that this Recruitment Data will be protected as if it

were processed inside the EU. We only transfer your Recruitment Data to third parties that are GDPR compliant. If you are located in the EEA or the UK, where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by contacting privacy@paramountcommerce.com.

For the avoidance of doubt, in the event that the UK is no longer a part of the EEA, references in this paragraph to the EEA shall mean the EEA and the UK.

6. EXERCISING YOUR RIGHTS

You will have the right to request access to, rectification or erasure of, the Recruitment Data we hold about you. You will also have the right to object to or restrict certain types of processing of your Recruitment Data where we are relying on consent or legitimate interests as the legal grounds for processing.

If you notice an error in your application that you would like to correct, please contact us using the contact information below.

Any request to exercise one of these rights will be assessed by us on a case by case basis. There may be circumstances in which we are not legally required to comply with your request or because of relevant legal exemptions provided for in the Data Protection Legislation.

7. CONTACT US

Please contact us at privacy@paramountcommerce.com if you would like to find out more about any matters relating to this Notice.

If you have concerns about the way in which we have handled your Recruitment Data you should contact us at privacy@paramountcommerce.com in the first instance. If you are still dissatisfied, you have the right to complain to your Data Protection Authority. In the UK, the Data Protection Authority is the Information Commissioner's Office.

Please refer to our [Privacy Policy](#) for further details.

8. UPDATES TO THIS NOTICE

We may change this Notice from time to time in order to reflect changes in the law, regulatory guidance or our data privacy practices in compliance with the law. When this happens and where required by law, we will provide you with a new or an updated notice detailing how the use of your Recruitment Data is changing and, if necessary, obtain your consent for the further processing.

This Notice was last updated on **Aug 30, 2022**