

## LoopMe

### Recruitment Privacy Notice

Last updated: 23 September 2021

#### 1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with all applicable laws. **It is important that you read all of this Notice carefully as it sets out how LoopMe ("the Company", "we" or "us") and its Group Companies 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 enquires about or applies for a role at LoopMe, 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 (at <https://loopme.com/contact/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.

##### *Personal Information collected from you*

The types of personal information we collect and process when you apply for a role with LoopMe includes (but is not limited to):

- **Identification data and contact details** – including your name, home address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)), photograph (if submitted).
- **Employment history** – such as previous employers and job titles/positions.
- **Background information** – such as academic/professional qualifications, job qualifications, education, details included in your CV/résumé (which might include details of your personal interests, extracurricular activities, skills and achievements, family information, any memberships or other interests which constitute sensitive personal information), transcripts and employment references.
- Details of your **nominated referees** - including their name, contact details, employer and job role.
- Details of your **work permit and/or immigration/visa status**.
- **Previous applications/roles** - information relating to previous applications you have made to the Company's Group and/or any previous employment history with the Company's Group.
- **Performance on tests or trial exercises** - conducted by us or recruitment agencies to assess your skills suitability to a role.
- **Diversity information** - provided voluntarily as part of recruitment surveys.
- **Other information you voluntarily provide** - throughout the process, including through assessment centers/exercises and interviews. This may include existing and expected salary and bonus, your willingness to relocate, travel arrangements and preferences, job expectations and links to your portfolio (including any links to portfolios on social media platforms that you send us).

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 ("**Sensitive 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 Sensitive Personal Information for legitimate recruitment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role.

#### *Personal information collected from other sources*

- **Information provided via our recruitment platform providers** - (such as Workable Software Limited and LinkedIn Talent Hub), including for example the website/platform on which you saw our Ad and applied for a role.
- **References** - provided by referees, former employers or any person who refers you to us.
- **Other background information** - provided or confirmed by academic institutions, professional organisations and/or training or certification providers.
- **On occasion criminal records data** - may be obtained through criminal records checks where strictly relevant in terms of the role offered (such as certain director positions) and where permissible under applicable law).
- **Information provided by background checking agencies** - and other external database holders for example, credit reference agencies and professional/other sanctions registries.
- **Information provided by recruitment or executive search agencies** - e.g. LinkedIn Recruiter.
- **Information collected from publicly available sources** - such as work-related social media platforms you use or other information available online but only to the extent these are relevant to the role (e.g. details of your career and experience on LinkedIn).
- **Information from immigration/work permit status advisors** - who, when needed, assist in filings to obtain appropriate work permits or visas.
- Automatic collection based on your interaction with our systems or movement within our facilities: for example if you visit LoopMe premises, your entry and exit from lobbies and other areas of our facilities may be monitored by closed circuit TV cameras (CCTV); and information collected via the use of cookies, web beacons and other technologies (see Section 3 on cookies in our [privacy policy](#) for more details).

(In each case, where permissible and in accordance with applicable law).

### **3. Purposes for processing personal information**

LoopMe collects and uses this personal information primarily for purposes related to recruitment – in particular to: identify potential candidates; collect and review applications; determine your qualifications for employment; assess your suitability for a role; and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference or background checks (where applicable), operating and managing our recruiting tools and processes and to generally manage your application and the hiring process and to communicate with you about it.

If you are accepted for a role at LoopMe, the information collected during the recruitment process will form part of your ongoing staff member record, and we may use any additional personal information collected to prepare for your on-boarding as an employee, or where relevant provide immigration support such as to facilitate the filing of any necessary visas or work permits.

We may also process this information, including conducting data analytics and reporting, to monitor and improve the effectiveness of our recruiting and employee processes, software and tools, and to understand market conditions and identify trends relating to market conditions such as compensation, hiring, benefits practices and representation of underrepresented populations.

Additionally, we store this information to: maintain records of our recruiting processes and tools; protect our systems and business interests; comply with applicable legal, law enforcement and other similar requirements; meet recordkeeping and reporting obligations; conduct audits; pursue legal rights and remedies; manage any internal complaints or claims; and comply with internal policies and procedures.

All of this information will be processed in accordance with our Employment Agreements and Employee Handbooks.

If you are not successful, we may still keep your application to allow us to consider you for other suitable openings within LoopMe in the future unless you request that we delete your application. We will not retain your application for more than 3 years.

#### **4. Who we share your personal information with and transfers abroad**

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 help ensure the information is used in a manner consistent with this Notice and to maintain the security and confidentiality of the information.

##### *Transfers to other Group Companies*

Recruitment data is processed in the UK but we may share your personal information with our Group Companies in other parts of the world (where relevant to the role) in order to administer our recruitment processes and store data. Our Group Companies are currently: LoopMe Inc. (US), LoopMe LLC (Ukraine) and LoopMe Pte Limited (Singapore) (together "the Group Companies"). Our primary servers are in Frankfurt, Germany.

##### *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:

- our recruitment platform providers, e.g. Workable Software Limited and LinkedIn Talent Hub;
- recruitment or executive search agencies involved in your recruitment, e.g. LinkedIn Recruiter;
- background checking or other screening providers and relevant local criminal records checking agencies (only where relevant to the role and permissible under applicable law);
- workforce solutions providers (e.g. Entity Solutions) to the extent that we are recruiting/hiring in a region where we do not have a business entity;
- data storage, shared services, IT developers and support providers and providers of hosting services in relation to our careers website; and
- third parties who provide support and advice including in relation to legal, financial/audit, management consultancy, insurance, health and safety, security and intel and whistleblowing/reporting issues.

We may also disclose personal information to third parties on other lawful grounds, including:

- where you have provided your consent;
- to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a summons, subpoena, government audit or search warrant;
- in response to lawful requests by public authorities (including for tax, immigration, health and safety, national security or law enforcement purposes);
- as necessary to establish, exercise or defend against potential, threatened or actual legal claims;
- where necessary to protect your vital interests or those of another person; and/or

- to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, provided that your information is only used for the purposes disclosed in this Privacy Notice.

In some cases, the sharing described above may result in your personal information being **transferred internationally, including from the United Kingdom and/or the European Economic Area (EEA) to a country outside it**. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our primary servers are located in Germany, and our Group Companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken several measures to help ensure that your personal information will be protected in accordance with this Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our Group Companies, which require all group companies to protect personal information they process from the EEA or the UK in accordance with applicable data protection laws.

## 5. Legal basis for processing personal information

In the EEA or the UK we must satisfy a "legal basis" for processing your information. Our legal basis for collecting and processing your personal information as part of the recruitment process depends on the personal information concerned and the purpose for which we use it. We normally rely on the following:

- our legitimate interests (as summarised above in Section 3) - which are not overridden by your data protection interests or fundamental rights and freedoms, particularly taking into consideration the safeguards that we put in place, for example, those outlined in Section 4 above;
- to comply with applicable legal obligations such as immigration and/or employment laws and regulations;
- to take steps prior to entering an employment contract with you, where you are considered for employment;
- where we have your consent to do so. Note, where we have requested your consent to process your personal data, you have the right to withdraw your consent at any time;
- to protect the rights and legitimate interests of LoopMe or its Group Companies, our employees, applicants and others, as required and permitted by applicable law.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

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

## 6. 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:

- in accordance with the retention periods set out in the LoopMe Employment Contracts and Employee Handbooks (where you become our employee); or
- for a period of up to 3 years after confirmation that your application was unsuccessful unless you request that we delete your application.

## 7. Your data privacy rights

If you are a resident in the EEA or UK, you have the following rights:

- the right to request access to, correction of, updates to, or deletion of your personal information;
- the right to object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your information;
- where we process your personal information on the basis of consent, the right to withdraw your consent at any time;
- the right to complain to a data protection authority if you believe that the processing of your personal data is in violation of the applicable legislation. For more information, please contact your local data protection authority.

If you are in the UK, or the EEA, the controller of your data is LoopMe UK Limited. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. If you have any questions or would like to exercise any of these rights please contact us at [privacy@loopme.com](mailto:privacy@loopme.com).

## 8. California Consumer Privacy Act (CCPA) Candidate Privacy Statement

This Privacy Statement ONLY applies to California consumers and supplements the Privacy Statement.

### Personal Information We Collect

We collect information that identifies, relates to, describes, or could reasonably be associated or linked, directly or indirectly, with a particular consumer or household ("CCPA personal information"). We have collected the following categories of CCPA personal information from consumers within the last twelve (12) months:

- **Identifiers:** "Identifiers" covers a broad range of information, including name, email address, postal address and telephone number. In connection with our recruitment activities, we collect some CCPA personal information in this category including name, email address, phone number and postal addresses as part of the application process. If we require a background check, we may collect information like your social security number to run such checks. We collect IP addresses when you connect to our job sites. If you click on a recruiting post we place on sites like LinkedIn, we may create an identifier that helps us know that you interacted with our post. These sorts of identifiers are connected to your recruiting file.
- Characteristics of protected classifications under California or federal law includes a broad range of information such as race, citizenship status, sex, gender identity and disability. As described above, when you apply for a job we may in some circumstances request information of this nature such as racial/ethnic origin, gender and disabilities on a voluntary basis.
- **Internet or other electronic network activity information:** Where the job application process is online, we may collect CCPA personal information in this category, such as your interactions with our job sites.
- **Audio, electronic, visual or similar information:** If you visit LoopMe facilities, your entry and exit from lobbies and other areas of our facilities may be monitored by CCTV.
- **Professional or employment-related information:** As part of the candidate screening process, we collect CCPA personal information in this category, such as information on your CV/résumé.

### Uses of CCPA personal information

We use categories of personal information listed above for the purposes noted above in Section 3 above.

### Sources of CCPA personal information

Our sources of information, including any CCPA personal information you provide to us, are detailed above at Section 2.

### Your rights under the CCPA

As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request information about how we have collected and used your Personal Information during the past 12 months including: the categories of Personal Information we have collected; the sources from which we collected Personal Information; the business or commercial purpose for collecting and/or selling Personal Information; the categories of third parties with whom we share Personal Information; whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third party recipient; whether we have sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** If we sell your Personal Information, you can opt-out. In addition, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California's "Shine the Light" law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination.

#### **How to exercise your rights**

You may request to exercise your California privacy rights described above by:

- calling us toll free on 1-866-I-OPT-OUT and entering service code 815# to leave us a message;
- emailing [privacy@loopme.com](mailto:privacy@loopme.com);
- sending a request by mail to LoopMe Limited, 107 Cheapside, EC2V 6DN, Attn: Privacy; or
- submitting a request by completing the webform found [here](#).

#### **9. Contact details**

If you have any questions, comments or requests regarding our use of your personal information or this Privacy Notice, please feel free to contact us/our data protection officer at [privacy@loopme.com](mailto:privacy@loopme.com).