



# Candidate Privacy Statement

Effective March 1, 2024

This Privacy Statement describes how accesso Technology Group, plc and its affiliates (*accesso*) collect and process personal data about you, how we use and protect this information, and the rights that may be available to you under applicable law in relation to this information. Accesso respects the privacy of all applicants and is committed to protecting the information you share in accordance with applicable privacy laws. accesso handles the Personal Data you submit when applying for job opportunities (whether as an associate or contractor) or provided by third parties for recruitment purposes.

This privacy statement describes the following:

- Personal data we use.
- How we use your personal data and the basis on which we use it
- Your rights over your personal data
- Data sharing
- Data security and storage
- International data transfer
- Contact us and changes to the Privacy Statement

This privacy statement describes the handling of personal data obtained about internal and external job applicants, including referral and applicants who have applied directly through *accesso's* career page as well as through third party agencies and recruiters on behalf of candidates. This privacy statement also describes the handling of personal data of any prospective candidates, such as those individuals who expressed an interest in receiving news and details about future *accesso* opportunities. Personal data is information, or a combination of pieces of information, that could reasonably allow you to be identified.

## 1. PERSONAL DATA WE USE

We will collect your personal data from you directly and potentially from other sources.

1.1 Data we collect directly from you:

The categories of data that we collect directly from you include:

1) Identifiers:

- a) personal (e.g., name) and contact details (e.g., phone number and email address)

2) Gender

3) Professional and Employment-Related Information:

- a) information contained in your resume or CV, and other documents related to the application or recruitment process (e.g., cover letter, transcripts)
- b) any other information you may choose to voluntarily submit to us in connection with your application (e.g., information contained in a cover letter, information disclosed in an interview or information you volunteer regarding your criminal records history, compensation history, or personal situation)
- c) languages and other relevant skills
- d) awards and professional memberships
- e) Professional and other work- related licences, permits and certifications where you provide them on your resume.
- f) Eligibility to work in the country where job applied for is located.

4) Educational Information:

- a) educational details (e.g., educational history, qualifications, certifications, skills) and job history (e.g., previous employment, roles, performance history)

5) Internet Activity Information:

- a) We may also collect information about you using cookies and similar technologies when you use or browse our website. See our [Privacy Policy](#) for further information about how this works.

We do not require, but you may also choose to voluntarily provide additional relevant data as part of your application. accesso does not collect Sensitive Personal Data for purposes other than where it is legally required or permitted by applicable data privacy regulations, such as furtherance of its diversity and anti-discrimination policies. Except where applicable law recognizes other valid grounds for such collection, storage, and use. accesso requires that consent be obtained for the collection, storage, and use of an applicant's Sensitive Personal Data. Categories of Sensitive Personal Data that accesso may receive from applicants include:

- Race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or criminal charges or convictions.

You are responsible for information you provide to *accesso* and for its accuracy, and for not knowingly omitting any relevant information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.

## 1.2 Data we collect from other sources:

We may collect the following data about you from other sources:

### 1) Professional and Employment-Related Information:

- a) background check data, potentially including your criminal records history, employment history, educational history and/or compensation history, from employment screening agencies, publicly available registers or databases, former employers and/or educational institutions (as allowed by local laws)
- b) information about your performance from references, or former employers you work with and/or with whom you may have worked in the past who may provide feedback about you (post offer acceptance)
- c) information about you from *accesso* employees who interview you and who may provide feedback about you.

### 2) Internet Activity Information:

- a) publicly available information from websites or social media, including information that you choose to voluntarily submit to us in connection with your application (e.g., when applying through LinkedIn)

## **2. HOW WE USE YOUR PERSONAL DATA AND THE BASIS ON WHICH WE USE IT**

We limit our use of your personal data. We aim to only collect and use your personal data for specific, necessary reasons and aim to explain our use of your personal data. For example, we use your personal data to:

- (a) create and manage the recruitment process, job applications and a database of interested individuals.
- (b) assess and evaluate your skills, qualifications and interests against the position applied for and/or other positions within *accesso*.
- (c) communicate with you via text messages in relation to your expressed interest in *accesso*, job opportunities, application, or the recruitment process.
- (d) keeping records related to our hiring process.

- (e) Providing any service available to you on our careers site.
- (f) conducting interviews
- (g) verify your information, including through reference checks and, where applicable, background checks
- (h) detect, prevent and respond to fraud or potentially illegal activities (such as intellectual property infringement), misuse of the recruitment system, this Candidate Privacy Statement or other *accesso* policies.
- (i) perform audits, assessments, maintenance, and testing or troubleshooting activities related to our recruitment processes.
- (j) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.
- (k) respond to your enquiries and requests.

We must have a legal basis to process your personal data. In most cases the legal basis will be one or more of the following:

- (a) to comply with our contractual obligations to you or to take steps to enter into a contract with you
- (b) to comply with our legal obligations
- (c) with your consent
- (d) to meet our legitimate interests, for example to conduct our recruitment processes efficiently and fairly or to manage applicants effectively. When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy or other fundamental rights and freedoms are not overridden by our legitimate interest to comply with our legal obligations, for example obtaining proof of your right to work status to enable us to meet relevant obligations

When we are required by local law to collect certain personal data about you, your failure to provide this data may prevent or delay the fulfilment of our legal obligations and may impact our ability to employ you. If we ask for your consent to process your personal data, you may withdraw your consent at any time by contacting us using the details at the end of this privacy statement.

To the extent that applicable law requires a legal basis to process Personal Data, *accesso* relies on legitimate interest for the processing of applicant Personal Data collected from *accesso*'s career site, and consent where such data is collected from an employment service provider (unless applicable law recognizes other valid grounds)

*accesso* must make a decision to appoint an applicant to a vacant role, we will need to process your Personal Data to decide to make an offer and, if you accept the offer, to enter into an employment agreement with you. Information about you will be added to our applicant database and will be used for the purpose of considering whether your profile meets the requirements of a vacant role at *accesso*. If we choose to make you an offer, the Personal Data you have submitted may be incorporated into our HR Information System and may be used to manage the new hire process. If you become an associate, your Personal Data will be managed in accordance with the *accesso* Associate Privacy Notice.

*accesso* undertakes that it will not process applicants' Personal Data so as to discriminate against them on prohibited grounds. *Accesso* will conduct the recruitment process in a fair and transparent way.

### **3. YOUR RIGHTS OVER YOUR PERSONAL DATA**

You have certain rights regarding your personal data, subject to applicable local laws. These include the following rights to:

- access your personal data.
- fix any errors with your personal data.
- in some instances, erase or delete your personal data.
- receive your personal data in a usable electronic format and transmit it to a third party (right to data portability)
- restrict the processing of personal data (including Sensitive Personal Data, as applicable)

*accesso* will accommodate such rights to the extent recognized by (and in accordance with) applicable law. If you would like to exercise any such right, please contact us at [PrivacyContact@accesso.com](mailto:PrivacyContact@accesso.com). You may also contact us at this email address if you have any questions, concerns or objections about how we process your Personal Data or about this privacy notice. Please note that certain Personal Data may be exempt from access, correction, deletion, or objection rights pursuant to law. If you are not satisfied with our response to your request, you may make a complaint to the relevant privacy statutory body in your country of residence. *accesso* will not discriminate against you for exercising your rights and choices.

We encourage you to contact us to update or correct your information if it changes or if the personal data, we hold about you is inaccurate.

## 4. DATA SHARING

While we do not sell or market your personal data, we may share your personal data with third parties in limited situations, including with:

- Service providers and business partners. We may share your personal data with our service providers and business partners that perform business operations for us. For example, we may partner with other companies for text messaging, to host the recruitment process and analyze data to improve performance or engage third parties to audit our systems, products, or practices. All third-party service providers are required to take appropriate security measures to protect your Personal Data in alignment with our contractual obligations and the law. We do not allow our third-party service providers to use your Personal Data for their own purposes. For those third parties acting as data processors, we only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

*accesso* will exercise appropriate due diligence in the selection of such third-party service providers and require appropriate contractual measures, that such third-party service providers maintain adequate technical and organizational security measures in compliance with applicable legal requirements in order to safeguard the applicant Personal Data, and process it as instructed by *accesso* and for no other purposes.

- Law enforcement agency, court, regulator, tax authority, government authority or other third party. We may share your personal data with these parties, if necessary, to comply with a legal or regulatory obligation, or otherwise to protect our rights, your rights, or the rights of any third party.

## 5. DATA SECURITY

Security is an integral part of our business model and we put significant resources into making sure your data is protected. This involves technical measures (such as implementing security software) and organizational measures (such as only allowing staff to access your data if there is a business need to do so). These measures are aimed at ensuring the on-going integrity and confidentiality of personal data. We evaluate these measures on a regular basis to ensure the security of the processing. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will retain your personal data for a period of time that enables us to:

- Maintain business records for analysis, understanding market trends and/or audit purposes.
- Comply with record retention requirements as required by local law or other relevant legal or regulatory requirements.

- Defend, establish, exercise, or bring any existing or potential legal claims. To show in the event of a legal claim that we have not discriminated against candidates on prohibited grounds and we have conducted the recruitment exercise in a fair and transparent way.
- Ensure fraud detection and prevention.
- Respond to any queries or complaints you may have.
- With your consent, suggest roles that may be of interest to you.

We will delete your personal data when it is no longer required for these purposes. If there is any personal data that we are unable, for technical reasons, to delete entirely from our systems, we will ensure that appropriate measures are taken to prevent any further processing or use of the personal data.

## **6. INTERNATIONAL DATA TRANSFER**

If you are an individual located in the European Economic Area, the United Kingdom, Canada or another jurisdiction outside of the United States with laws and regulations governing personal data collection, use, and disclosure that differ from United States laws, please be aware that information we collect (including through the use of methods such as cookies and other web technologies) may be processed and stored in the United States or in other countries where we or our third-party service providers have operations. We only transfer your data internationally when we are satisfied that adequate levels of protection are in place to protect the integrity and security of any information being processed, in compliance with applicable data protection laws. To provide adequate protection for international transfers, accesso utilizes transfer mechanisms recognized by your home country, which may include executing appropriate Standard Contractual Clauses.

accesso commits to comply with the EU-U.S. Data Privacy Framework, the Swiss-U.S. Data Privacy Framework, and the UK Extension to the EU-U.S. Data Privacy Framework (collectively, the “DPF”) and certifies its adherence to the DPF Principles as set forth by the U.S. Department of Commerce.

## **7. CONTACT US AND CHANGES TO THE PRIVACY STATEMENT**

If you have questions or concerns regarding the way in which your personal data has been used or about this privacy notice, please contact the Privacy Team at [PrivacyContact@accesso.com](mailto:PrivacyContact@accesso.com).

This policy was last updated March 1<sup>st</sup>, 2024. We reserve the right to amend this privacy notice at our discretion and at any time and will notify you by email or through a notice on our website homepage. Changes to this policy will be posted on our careers page. Please check back regularly to ensure you are familiar with our current practices.

