

PROWLER.io Limited – Candidate Privacy Notice – UK

1. What is the purpose of this document?

PROWLER.io Limited (“PROWLER” or “We” or “Us” or the “Company”) is responsible for deciding how the personal information that you provide as part of your application for a job with PROWLER, is used. This notice provides you with key information about the use of your Data.

2. Definitions to help you understand this Privacy Notice

Defined Term	Meaning
Data	Any Personal Data, and where relevant, any Special Categories of Personal Data.
Personal Data	Any information about data subjects including candidates for employment, employees, workers and self-employed individuals who can either be directly identified from the data or indirectly identified if that information was connected with other information.
Processing	Any handling of Personal Data including (but not limited to) the collection, storage, organising, use and destruction of that data.
Special Categories of Personal Data	Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; genetic data or biometric data; and data concerning health or sex life and sexual orientation.

3. The kind of information we hold about you

In connection with your application, we will collect and store Data that is contained in:

- your CV, covering letter, on-line application;
- our correspondence with the employment agency, or search and selection business you have authorised to search for employment opportunities on your behalf; and
- any information you provide to us during a telephone or face to face interview.

This data may include:

- your name, address, contact details including email addresses and telephone numbers
- details of your skills, qualifications, experience and employment history
- information about your current level of remuneration and benefits
- information about your entitlement to work in the UK

We may also collect, store and use the following Special Categories of Data, including

- information about your race, ethnicity, religious beliefs, sexual orientation or political opinions; and
- information about your health, including any medical condition, and health.

4. How is your Data collected?

We may collect Data directly from you but also from any appointed background check provider or credit reference agency, your named referees and certain publically accessible Data sources (for example from LinkedIn).

5. How do we use your Data?

We will use the Data we collect about you to:

- assess your skills, qualifications, and suitability for the applicable role;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process; and
- keep records related to our hiring processes.

We have a legitimate interest in Processing your Data to make sound, fair and justifiable recruitment decisions, to benefit PROWLER's business. Your Data may also be Processed so as to take steps at your request, before entering a contract.

6. How do we use Special Categories of Personal Data?

We will use your Special Categories of Personal Data in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process; and
- We will use information about your nationality for the purpose of checking or assisting you to secure the right to work in the UK
- We will use information about your race or national or ethnic origin, to ensure meaningful equal opportunity monitoring and reporting.

The above Processing is being conducted for the purposes of carrying out obligations and exercising rights in the field of employment law.

7. What happens if you don't provide any relevant Data?

If you fail to provide any Data when requested (following the initial Data you are submitting on this site), we will not be able to evaluate your application and therefore process your application further.

8. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

9. Why might we share your Data?

Your Data may be shared with the following third parties for the purposes of processing your application:

- Certain third-party organisations that PROWLER will engage to help evaluate your application, all of whom are located within the EEA.
- Where we have a legal basis for doing so, we may transfer your personal data with consultants providing services to the Company. Each consultant has agreed to comply with appropriate data protection policies.
- We also share your personal data with Greenhouse Software, Inc, a cloud-based services provider located in the United States of America and engaged to help Prowler.io manage the recruitment and hiring process. The transfer will be subject to appropriate additional safeguards under the Privacy Shield and/or standard contractual clauses agreed between Prowler.io and Greenhouse Software, Inc. Details of the Privacy Shield and/or standard contractual clauses are available on request.

10. How long will we use your Data for?

If your application is unsuccessful, we will retain your Data for a period of six months after we have communicated our decision to you, unless we have a legitimate reason for retaining the Data for longer. After this period, we will securely destroy your Data.

If your application is successful, any relevant Data that you have provided as part of the application process will be transferred onto your personnel record. The remaining information shall be securely destroyed.

11. What rights do you have in connection with your Data?

Under certain circumstances, by law you have the right to:

- **Request access** to your Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Data we hold about you and to check that we are lawfully Processing it.
- **Request correction** of the Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your Data. This enables you to ask us to delete or remove Data where there is no good reason for us continuing to Process it. You also have the right to ask us to delete or remove your Data where you have exercised your right to object to processing (see below).
- **Object to Processing** of your Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your Data for direct marketing purposes.
- **Request the restriction of Processing** of your Data. This enables you to ask us to suspend the processing of Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your Data to another party.

12. Contact us

If you have any questions about this privacy notice, please contact Juha Seppa, SVP Operations and Delivery at juha@proowler.io. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.