Applicant Privacy Notice

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At Technorely Inc. (hereinafter also referred to as «we», «our», «us») we deeply care about privacy. We collect and process personal data relating to applicants as part of our recruitment process.

Transparency is one of the main values of our company, and we are committed to being upfront about our privacy practices, which are designed to provide a high level of protection for your personal data.

This Privacy Notice is made in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679, dated May 25, 2018 and explains our privacy practices for applicants during the application process and after it, and outlines what information of yours will be collected by Technorely Inc. when you apply for a vacancy via the website https://technorely.com/ (hereinafter – «the Website») or other way, how the information will be used, how you can control the collection, correction and/or deletion of information and how to get in touch with us if you need. We will not use or share your information with anyone except as described in this Privacy Notice.

This Privacy Notice shall be read in conjunction with our Privacy policy and Cookie Policy.

Please read this Privacy Notice carefully to understand our views and practices regarding your personal data before applying for a vacancy. If you do not agree to the terms of this Privacy Notice, please do not apply for a vacancy.

We reserve the right to amend this Privacy Notice at any time, for any reason. Any changes we make to this Privacy Notice will be posted on this page. The date of the last revision to the Privacy Notice will be indicated by the «Last updated» date at the beginning of this page.

1. What Data Do We Collect About You?

When you apply for a vacancy at Technorely Inc, we will ask you to provide us with personal information about yourself so we can evaluate your application. If this information is not provided, our ability to consider you as a candidate may be limited. You may also provide us with your personal information that we have not specifically requested (for example, your CV may contain information about your hobbies and social preferences). All information is provided on a voluntary basis and you determine the extent of information that you provide to us.

We collect the following information about you, as our applicant:

Personal Data

The kind of personal information we collect about you may include:

- Your name, address, email address, telephone number, other contact information;
- Your employment details, previous positions, work experience, employment references, your qualifications, skills and experiences;
- Your financial expectations;
- Your educational information, including degrees and certificates;
- Any other information in your application that you choose to share with us: such as personal preferences, hobbies, social preferences, etc.

Sensitive Data

Technorely Inc. does not require sensitive personal data regarding religion, health, sexual orientation or political affiliation in connection with your application.

2. How Do We Collect Your Personal Data?

We may collect this information in different ways. For example, data might be contained in application forms (including through your usage of our Website) or CVs, which were provided directly by you, as well as obtained from your passport or other identity documents, or collected through interviews or other methods of assessment.

From time to time, we may obtain information about you from public sources or third parties. For example, we may conduct background screenings through a third-party service provider and verify information that you have in your application that relates to your past education, employment, credit and/or criminal history, as allowed by applicable law or we may look for references supplied by your former employers. You may also choose to provide us with access to certain personal information stored by third parties such as job-related social media sites (for example, LinkedIn). By authorizing Technorely Inc. to have access to this information, you agree

that Technorely Inc. may collect, store and use this information in accordance with this Privacy Notice.

3. For What Purposes Do We Collect Your Data?

The information collected by Technorely Inc. is used in accordance with this Privacy Notice and solely for the following purposes:

- To recruit, select, evaluate and appoint candidates for the positions they have applied for and for subsequent job opportunities;
- To provide general HR, Legal and Finance administration and management;
- To carry out surveys (e.g., in order to improve our recruitment process);
- To verify your background (e.g. through references you have provided);
- To communicate with you regarding the current status of your application;
- To contact you regarding our news and/or new vacancies.

We will not use your data for any purpose other than mentioned herein. We do not sell your personal information.

4. With Whom Do We Share Your Personal Information?

Your information may be shared internally within the company for the purposes of the recruitment process on a need-to-know basis.

Thus, members of the HR and Recruiting team, interviewers involved in the recruitment process, have access to your personal data. Besides, our Legal and Finance team also have access to your personal information if you become our team member.

Technorely Inc. will not share your personal information with third parties, unless your application is successful and an offer is made.

We may share your data if you are our team member (including your name, education, working experience, skills and qualifications) with our clients before your participation in a certain project.

We may also need to use third party service providers, for example, to help us manage our applicant tracking system or to help host our websites or servers.

In addition, we may need to share your personal information with a regulator or otherwise to comply with the law.

5. What Are the Legal Grounds for Our Processing of Your Data?

Technorely Inc. relies on a number of legal bases to collect and process your personal data. The processing of personal data is necessary:

- o for the recruitment, selection, evaluation and appointment of new team members and the management and administration of the recruitment and HR process, to the extent these activities do not prejudice or harm your rights and freedoms;
- o for compliance with a legal or regulatory obligations, laws or to exercise or defend any impending or asserted legal claims;
- o for the purposes of the legitimate interests pursued by us or another person, provided that this will only be in circumstances in which those legitimate interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal data.

6. How Long Do We Store Your Data?

This depends on whether your application is successful or not.

Besides, we will only retain your personal data for as long as necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If your application is successful, the personal data gathered during the recruitment process will be transferred to your personnel file and retained during your services provision to Technorely Inc. After the end of our cooperation, your personal information will be subject to deletion and/or erasure.

If your application is unsuccessful, we will hold your data on file for 6 months. At the end of that period, your data is deleted and/or destroyed (unless we need to retain it for longer to exercise or defend any legal claims).

7. Where Do We Store and Process Your Data?

Your information collected by us is stored and processed in Europe, where Technorely Inc. maintains its servers.

If you are located in the European Union or European Economic Area, please note that we will not transfer information, including personal data, to a country outside of the European Union or European Economic Area.

8. How Do We Store and Protect Your Data?

The security of your personal information is important to us. Technorely Inc. protects your personal information in the same way that it protects its own confidential information, such as storing it on secure servers that only select personnel of Technorely Inc. have access to, compliance with internal policies and controls to help prevent access by any unauthorized parties, as well as to ensure that your data is not lost, accidentally destroyed, misused or disclosed

We apply generally accepted industry standards to deal with any personal information breach and will notify you and any applicable regulator of a breach when legally required to do so.

Technorely Inc. is concerned with protecting your privacy and data, but, unfortunately, no method of transmission over the internet or method of electronic storage is 100% secure. We cannot ensure or warrant absolute security of any information you transmit to us or guarantee that your information may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards.

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. What Are Your Data Protection Rights?

GDPR provides users with rights related to their personal information. Consistent with law, Technorely Inc. would like to make sure you are fully aware of all of your data protection rights.

- **Right to Access & Portability**: you can request access to your personal information, as well as a copy of your personal information in an easily accessible format and information explaining how that information is used;
- **Right to Rectification**: you can request that any inaccurate or incorrect personal data about you that we are processing be rectified;
- **Right to Deletion:** under certain circumstances, you have the right to request the deletion of your personal data, except information we are required to retain by law, regulation, or to protect the safety, security and integrity of Technorely Inc.;
- **Right to Erasure**: you can request that we erase your personal data under certain circumstances (e.g. if the personal data has been provided by you and it is no longer necessary for us to continue to process it):
- **Right to Object Processing**: in some cases, where we process your personal information based on our legitimate interests or in the public interest, you can object to such processing. In such cases, we will cease processing your information unless we have

compelling legitimate grounds to continue processing or where it is needed for legal reasons;

- **Right to Restrict Processing**: in some cases where we process your personal information, you may also have the right to restrict or limit the ways in which we use your personal data;
- **Right to Withdraw Consent**: where we rely on consent, you can choose to withdraw your consent to our processing of your information, after which the processing shall be stopped.

You will not have to pay a fee to access your personal information (or to exercise any of the above-mentioned rights). However, Technorely Inc. may charge a reasonable fee or refuse to comply with your request if your request is clearly unfounded, repetitive or excessive.

We try to respond to all legitimate requests within one month. However, it may need more time if your request is complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Privacy Notice Contact Information

In case if you wish:

- To revoke your consent to any relevant processing of personal data;
- To exercise your right of access to your personal data,

as well as if you have any questions regarding this Privacy Notice or the use of your information, please contact us at the address below. We always welcome feedback.

Our full details are:

Technorely Holding Inc.

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email: info@technorely.com