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Finom Group

# Candidate Privacy Notice



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# 1. Introduction

This Candidate Privacy Notice (the “Privacy Notice”) explains how we collect, use, store and protect personal data about individuals who apply for employment with us or who are considered for an individual service contractor engagement. It also explains the rights available to candidates under applicable data protection laws, including the EU General Data Protection Regulation (GDPR) and, for candidates applying to our UK entity, the UK GDPR and the Data Protection Act 2018.

In this notice, “candidate”, “you” and “your” refer to applicants, prospective employees, interns, individual contractors and other individuals considered for a role or service engagement with us. “We”, “us” and “our” refer to the Finom group company that recruits for the role you apply for (named in the job advertisement or application), for example PNL Fintech B.V., Jachthavenweg 109H, 1081KM Amsterdam, the Netherlands, Trade Register number: 74178784

# 2. Who is responsible for your personal data processing

We, acting as a controller, are responsible for the personal data processed under this Privacy Notice. The controller determines why and how your personal data is processed for recruitment and pre-contractual engagement purposes.

If more than one group company takes part in the recruitment process, we will tell you in the job advertisement or in our first communication which company is the controller and, where companies share responsibility, the main points of how they divide it; you can ask us for them at any time. If a recruitment agency or other third party is involved, we will tell you whether it acts as a separate controller or only on our behalf.

# 3. Scope of this notice

This notice applies to personal data processed in connection with evaluating your suitability for employment or for entering into an individual service contract with us. It covers data collected directly from you and, where applicable, data obtained from other sources as described below.

This notice does not replace any internal data policy or other privacy information that may be provided to you if you join us or enter into a service contract with us.

# 4. Personal data we collect

We may collect and process the following categories of personal data, depending on the role, the recruitment stage and the information you choose to provide:

- **Identification and contact data** (your full name, email address, phone number, location, postal address and other contact details that you provide or that are included in your application materials).
- **Application and CV data** (information included in your CV, resume, cover letter, portfolio, application form or professional profile, such as employment history, education, qualifications, skills, languages, certifications, professional memberships, references, publications, portfolio links, current employer, notice period, salary or fee expectations, availability and any other information you include). We do not ask you for your current or past pay.
- **Interview and assessment data** (information you provide or that is recorded by us during interviews, calls, tests, technical assessments, case studies or other recruitment steps, including interview notes, evaluation comments, scoring, feedback, communications with you and information about your suitability for the role or service engagement).
- **Administrative recruitment data** (role applied for, recruitment stage, scheduling information, communications, decision status, offer details and records necessary to manage the recruitment process).
- **Compliance and verification data, where applicable** (information required to verify your identity, right to work, professional qualifications, references or other role-specific eligibility requirements, but only where such checks are relevant, proportionate and permitted by applicable law).
- Optional information you choose to share (for example your pronouns or a recording of how to pronounce your name, if our application form offers these fields). Providing it is voluntary and we do not use it to assess your application.
- Data obtained from other sources (where relevant to the role, we may also receive or collect limited professional information about you from job boards and recruitment platforms through which you apply, such as LinkedIn or Indeed; from recruitment agencies; from people who refer you; and from publicly available professional profiles, websites or portfolios).

If we receive your personal data from someone other than you, for example from a referral, an agency or a professional network, we will tell you and send you a link to this notice when we first contact you, and at the latest within one month. If we add you to our recruitment system without an application, our system sends you an email at once with a link to this notice and with the choice to keep or delete your data. If you do not respond within 30 days, your data is flagged for deletion. We contact people who have not applied on the basis of our legitimate interest in recruiting; you can object at any time by writing to privacy@finom.co, and we will stop contacting you and delete your details.

We use such information only where it is relevant to the role or service engagement, proportionate to the recruitment purpose and consistent with what you could reasonably expect in a professional recruitment context.

You are not legally required to provide most candidate personal data to us. However, if you do not provide information that is necessary to assess your application, communicate with you or take pre-contractual steps, we may be unable to continue the recruitment process or consider you for the relevant role or service engagement. When you apply through our application form, we ask you to confirm that you have read this notice.

Please do not provide personal data that is not relevant to the recruitment process, especially sensitive information. We do not ask you to provide special category data, such as information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for identification, sex life or sexual orientation. If you voluntarily include such information in your CV, application materials or interview responses, we will handle it with additional safeguards and only to the extent necessary for the recruitment process or as otherwise permitted by applicable law. If you need a reasonable accommodation during the recruitment process, we may, where necessary and permitted by applicable law, and where required, with your explicit consent, process limited health-related information for that purpose.

# 5. Why we process your personal data and our lawful bases

We process candidate personal data for the purposes and lawful bases set out below. More than one lawful basis may apply depending on the recruitment stage and the specific activity.

| **Purpose** | **Examples of personal data used** | **Lawful basis under GDPR** |
|---|---|---|
| Receiving and managing your application; communicating with you; scheduling interviews or assessments. | Identification and contact data; application and CV data; communications; scheduling data. | Article 6(1)(b): steps taken at your request before entering into an employment or service contract |
| Assessing your qualifications, skills, experience, suitability and fit | CV data; interview data; assessment results; notes and feedback from hiring managers or interviewers. | Article 6(1)(b): pre-contractual steps.<br>Article 6(1)(f): our legitimate interest in selecting suitable |

| Purpose | Examples of personal data used | Lawful basis under GDPR |
|---|---|---|
| for a role or service engagement. | | candidates and ensuring effective recruitment decisions. |
| Making a hiring or engagement decision; preparing and, where applicable, negotiating an employment offer or service contract. | Application data; interview and assessment data; salary or fee expectations; availability; offer and negotiation records. | Article 6(1)(b): steps before entering into an employment or service contract. |
| Conducting limited verification checks, such as right-to-work, references, qualification checks or role-specific background checks, including, for certain roles, a certificate of conduct or criminal record check, where applicable. | Identification data; professional history; references; eligibility or verification information relevant to the role. | Article 6(1)(b): pre-contractual steps where checks are necessary for the role.<br>Article 6(1)(c): legal obligation where checks are required by law. For criminal record checks, we rely on Article 10 GDPR together with the national law that requires or permits the check.<br>Article 6(1)(f): legitimate interest in verifying suitability and reducing recruitment risk, where lawful and proportionate. |
| Maintaining recruitment records, documenting decisions and protecting our legal rights. | Recruitment file; decision records; interview notes; correspondence; relevant audit trail. | Article 6(1)(f): our legitimate interest in maintaining appropriate records and establishing, exercising or defending legal claims.<br>Article 6(1)(c) may apply where record-keeping is legally required. |

| Purpose | Examples of personal data used | Lawful basis under GDPR |
|---|---|---|
| Keeping candidate data for a limited period so we may contact you about relevant future opportunities. | Identification and contact data; CV/application data; role preferences; recruitment outcome and relevant notes. | Article 6(1)(a): your consent, which we ask for separately (in the application form or, if we added you without an application, by email) before keeping your data after the recruitment process ends, so that we can consider you for other roles. |
| Using recruitment tools with artificial intelligence features to organise applications and summarise interview feedback (see Section 10). | CV and application data; interview notes and feedback. | Article 6(1)(f): our legitimate interest in an efficient and consistent recruitment process. Every hiring decision is made by people. |
| Improving our recruitment process, for example through reports on our hiring process and optional candidate surveys. | Administrative recruitment data; survey answers, if you choose to reply. | Article 6(1)(f): our legitimate interest in improving our recruitment process. |
| Ensuring the security, integrity and proper operation of our recruitment systems and communications. | System logs, access records, email metadata, security records and other technical information related to recruitment systems. | Article 6(1)(f): our legitimate interest in protecting our systems, information and recruitment process. |

Where we rely on legitimate interests, we have considered the relevance of the processing to the recruitment process, the limited nature of the data used, candidates' reasonable expectations and the safeguards described in this notice, including retention limits and the right to object.

# 6. Who may receive your personal data

Within our organisation, your personal data may be accessed by HR personnel, recruitment personnel, hiring managers, interviewers, authorised members of management, legal/compliance personnel and IT/security personnel where access is necessary for their role.

We may also disclose candidate personal data where required by law, where necessary to protect our legal rights or where necessary in connection with a corporate transaction, reorganisation, audit or legal proceeding.

P**rocessors and service providers**

We use service providers that process candidate personal data on our behalf and only under our instructions. Our applicant tracking system is provided by Greenhouse Software, Inc., which acts as our processor. Other service providers may include our HR information system (for candidates who are hired), email and cloud productivity providers, video conferencing and interview tools, assessment or testing providers, scheduling tools, IT hosting, maintenance and security providers, and recruitment agencies where they act on our behalf.

We require processors to implement appropriate technical and organisational measures and to process personal data only in accordance with a written data processing agreement.

Recipients that act as separate controllers

Job boards and professional networks through which you apply or which you use to contact us (for example LinkedIn or Indeed) process your data under their own privacy notices. A recruitment agency that introduces you to us may also act as a separate controller; if so, its own privacy notice applies to its processing. Authorities, courts and professional advisers may receive your data where required by law or necessary to establish, exercise or defend legal claims.

Cookies on our career site

Our career site and the pages through which you apply may use cookies or similar technologies. Where they do, we describe them in the cookie information shown on the site and ask for your consent where the law requires it.

# 7. Where your personal data is stored and transferred

We store candidate personal data mainly in the European Union. Our applicant tracking system provider, Greenhouse Software, Inc., hosts our recruitment data in a data centre in Germany. Greenhouse and some of its sub-processors, including providers of artificial intelligence services and interview recording, may access or process the data in the United States. These transfers rely on the EU-U.S. Data Privacy Framework, under which

Greenhouse is certified, with Standard Contractual Clauses as a fallback. Some of our other service providers, such as email, cloud productivity or video conferencing providers, may also process data outside the European Economic Area under similar safeguards.

Some of our team members, for example in the United Kingdom, may also access candidate data from outside the European Economic Area. Where this happens, we rely on an adequacy decision (such as the one for the United Kingdom), Standard Contractual Clauses or another transfer mechanism permitted by law, together with appropriate safeguards. If you apply to our UK entity, transfers of your data from the United Kingdom to the European Economic Area are permitted under UK adequacy regulations. You can ask us for more information about these safeguards using the details in Section 13.

# 8. How long we keep your personal data

We keep candidate personal data only for as long as necessary for the purposes described in this notice, subject to applicable legal requirements and the retention periods below.

If the recruitment or engagement process is successful, we keep your recruitment data for the duration of the recruitment process. Once an employment or service contract is concluded, the relevant data becomes part of your employee or contractor file and is kept in accordance with our internal retention policies and the onboarding documents provided to you. We delete or anonymise the remaining data in our applicant tracking system within 12 months after your start date.

If the recruitment or engagement process is unsuccessful, we keep your personal data for 12 months from the end of the recruitment process if you have consented to this (see below). If you have not consented, or if you withdraw your consent, we delete or anonymise your personal data promptly after the recruitment process ends or after you withdraw your consent, unless a longer period is required or permitted by applicable law. By consenting, you allow us to keep relevant candidate data for 12 months so that we can consider you for other roles and contact you about them. We ask for this consent when you apply, through a separate unticked box in the application form, or by email if we added you without an application. Giving consent is optional and does not affect your application, and you can withdraw it at any time by writing to privacy@finom.co. About 14 days before the 12 months end, we will ask whether you want us to keep your data for another 12 months; if you do not reply, we delete or anonymise it.

Where certain recruitment-related records are necessary for legal, compliance or dispute-related purposes, we may retain them for the period required by applicable law or for the applicable limitation period for relevant claims. This retention is necessary to comply with legal obligations and to establish, exercise or defend legal claims.

When personal data is no longer required, we will delete it, anonymise it or securely restrict access in accordance with our retention and deletion procedures.

# 9. How we protect your personal data

We apply appropriate technical and organisational measures designed to protect candidate personal data against unauthorised access, loss, misuse, alteration or disclosure. These measures may include access controls, need-to-know permissions, secure storage, logging, confidentiality obligations, secure communications and internal policies for handling personal data.

# 10. Automated decision-making

We do not make recruitment decisions based solely on automated processing, including profiling, that produces legal effects concerning you or similarly significantly affects you. Every hiring decision is made by people at Finom.

We use some tools with artificial intelligence features to help our recruiters, for example to extract information from CVs into our applicant tracking system, to summarise interview feedback and scorecards, to answer a recruiter's questions about a candidate using the candidate's profile, applications, interviews and scorecards, and to help draft job descriptions, interview questions and messages. These tools are provided by Greenhouse and its artificial intelligence service provider. These tools support our team but do not decide who moves forward. We use them on the basis of our legitimate interest in an efficient recruitment process. Our applicant tracking system provider and its artificial intelligence service providers may not use your personal data to train their models. If you prefer that such tools are not used to review your application, tell your recruiter, use the opt-out option shown on the job posting where available, or write to privacy@finom.co; this will not affect your application, and we will then review it without these tools.

If we record or transcribe an interview with an AI note-taking tool, we will tell you in advance, for example when you schedule the interview, and you can decline without any effect on your application. Recordings, transcripts and summaries are available only to the people involved in your recruitment, are used only for the hiring decision and are kept for a limited period. Please do not share sensitive information, such as information about your health or religion, during an interview unless you need us to make a reasonable accommodation.

For some roles we may use a tool in our applicant tracking system (Talent Matching, provided by Greenhouse and its artificial intelligence service provider) that compares the skills and experience in a CV with the requirements of the job and places each application in a match category (for example Strong, Good, Partial or Limited), with a short explanation of the reasons. The match category is based only on job-related criteria set by our recruiters and not on protected characteristics such as gender, age or ethnicity. It is an aid for sorting applications: recruiters read every application themselves, no application is rejected or moved forward on the basis of the match category alone, and a person makes every decision. We use it on the basis of our legitimate interest in handling many applications consistently and

efficiently. If we use this tool for a role, the job posting says so. If you do not want it to be used on your application, you can opt out through the option shown on the job posting, tell your recruiter or write to privacy@finom.co; a person will then review your application without the tool, and this will not affect your application. You can also ask us for a human review of any outcome, express your point of view and contest the decision.

# 11. Your rights

Subject to the conditions and limitations under applicable law, you may have the following rights in relation to your personal data:

| **Right** | **Description** |
|---|---|
| Access | You may request confirmation of whether we process your personal data and obtain a copy of that data. |
| Rectification | You may ask us to correct inaccurate or incomplete personal data. |
| Erasure | You may ask us to delete personal data where the legal conditions for deletion are met. |
| Restriction | You may ask us to restrict processing in certain circumstances. |
| Objection | You may object to processing based on legitimate interests. |
| Portability | Where processing is based on consent or contract and carried out by automated means, you may request a copy of data you provided in a structured, commonly used and machine-readable format. |
| Withdraw consent | Where processing is based on consent, you may withdraw consent at any time. Withdrawal does not affect processing carried out before withdrawal. |
| Complaint | You may lodge a complaint with the competent data protection supervisory authority in your EU Member State, including the authority of your habitual residence, place of work or place of the alleged infringement. For processing carried out by PNL Fintech B.V., the lead supervisory authority is the Dutch Data Protection Authority (Autoriteit |

| Right | Description |
|---|---|
| | Persoonsgegevens). If you apply to our UK entity, you may also contact the UK Information Commissioner's Office (ICO). |

To exercise your rights, please contact us using the details in Section 13. We may need to verify your identity before responding to your request, and we answer within one month.

# 12. Updates to this notice

We may update this notice from time to time to reflect changes in our recruitment process, systems, legal requirements or privacy practices. The latest version will be provided or made available to candidates as appropriate.

# 13. Contact details

If you have any questions about this notice or how we process your personal data, or if you wish to exercise your rights, please do not hesitate to contact our DPO at privacy@finom.co. We are committed to ensuring that candidates understand how their personal data is used and processed and are available to provide additional information where reasonably required.