

CANDIDATE PRIVACY NOTICE

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Validato Ltd., Claridenstrasse 34, 8002 Zurich, Switzerland (including any group company of Validato Ltd. located in the European Economic Area) provides background check services to clients. In connection with these services, Validato processes personal data relating to candidates solely on behalf of and on the documented instructions of the relevant client.

This notice explains how your personal data is collected, used, stored and protected during the background check process. We have taken technical and organizational measures to ensure compliance with the Swiss Data Protection Act, EU General Data Protection Regulation (GDPR) and the United Kingdom General Data Protection Regulation (UK GDPR), as the case may be.

1 Controller

The controller of your personal data for the background screening is the client that has requested the screening (the "**Client**"). The identity of the relevant Client will be communicated to you at the start of the screening process and, in any event, before any background screening is initiated.

You may request the identity of the Client at any time by contacting us at: gdpr@validato.com.

2 Processor and sub-processors

Validato acts solely as a processor on behalf of the Client and processes your personal data only on the Client's documented instructions and only for the purposes of providing the background screening service to the Client.

Validato may engage affiliated companies and carefully selected third-party service providers acting as sub-processors to support the delivery of the screening service. These sub-processors may include providers of hosting, IT infrastructure, secure storage, communications, identity verification support, customer support and other services necessary to provide the screening service. All sub-processors are contractually bound to data protection and confidentiality obligations consistent with applicable data protection law. For confidentiality and security reasons, Validato does not generally publish the identity of individual sub-processors to candidates, but provides information about the relevant categories of recipients in this notice.

3 What personal data we collect

The categories of personal data we collect and process may vary depending on the specific engagement and are defined in the Data Processing Agreement (DPA) concluded with the Client. The following is an indicative list:

Identification & Contact Data

- Full name, date of birth, nationality
- Email address, phone number, home address

Professional & Educational Background

- CV / résumé, cover letter
- Work history, references, qualifications, certifications
- LinkedIn profile or other professional profiles (if provided)

Background Check Data *(processed only with your explicit consent – see Section 5)*

- Identity verification
- Employment and education history verification
- Financial / credit check data
- Criminal record data *(where legally permitted)*

Swiss candidates: Criminal record data is subject to enhanced protection.

EU/EEA candidates: Criminal record data is subject to enhanced protection.

4 Sources of personal data

Depending on the screening requested by the Client, Validato may process personal data obtained from the following sources, where permitted by applicable law:

- directly from you;
- from the Client;
- from former employers, educational institutions and referees relevant to the screening;
- from publicly available sources; and
- from official records or carefully selected third-party providers supporting the screening process.

5 Purposes and legal basis for processing

Validato processes your personal data solely on behalf of the Client for the purpose of carrying out the background screening requested by the Client.

The applicable legal basis for the screening is determined by the Client in accordance with applicable law and may vary depending on the jurisdiction, the role and the type of screening concerned. Where required by applicable law, certain checks will only be carried out on the basis of your explicit consent. In such cases, you will be informed of:

- the identity of the Client;
- the specific checks to be carried out; and
- how you may withdraw your consent where withdrawal is available under applicable law.

Where you withdraw consent, this will not affect the lawfulness of processing carried out before the withdrawal.

6 How we share your data

Your personal data may be disclosed to:

- the Client, as controller of the screening process;
- Validato group companies acting on behalf of Validato in the provision of the service;
- categories of sub-processors providing services such as hosting, IT infrastructure, secure storage, communications, customer support, and identity verification support; and
- competent authorities, courts, regulators, or law enforcement bodies where required by applicable law or binding order.

Validato does not sell your personal data.

7 International data transfers

Where personal data is transferred outside Switzerland or the European Economic Area, Validato ensures that appropriate safeguards are in place as required by applicable law.

Depending on the transfer scenario, these safeguards may include an adequacy decision, standard contractual clauses or another lawful transfer mechanism recognised under applicable data protection law.

You may request further information about the applicable transfer safeguards by contacting us at gdpr@validato.com.

8 Data retention

Candidate personal data is retained for a **maximum of 130 days** (including backups) from the date the background check report is generated, after which it is securely and irreversibly deleted.

Limited records demonstrating compliance, such as audit or deletion logs, may be retained for longer where necessary; such logs are anonymised and cannot be linked to any individual data subject.

9 Your rights

Subject to applicable law, you may have rights of access, rectification, erasure, restriction, objection, data portability, and, where applicable, the right to withdraw consent.

As the Client is the controller for the screening process, requests relating to these rights should in principle be directed to the Client. If you contact Validato, Validato may forward your request to the relevant Client and assist the Client in responding, as appropriate.

10 Supervisory authorities & complaints

If you believe that your personal data has been processed in breach of applicable data protection law, you have the right to lodge a complaint with the competent supervisory authority.

You may also contact Validato at gdpr@validato.com and/or the relevant Client in the first instance so that the matter can be reviewed.

11 Automated decision-making

Validato **does not carry out any automated decisions** that produce legal or similarly significant effects concerning you, nor **does it carry out profiling** for such purposes. Any technology-assisted output used in the screening process is subject to human review before any results are communicated.

12 Data Security

Validato implements appropriate technical and organisational measures designed to protect personal data against unauthorised access, loss, misuse, alteration, or

disclosure. These measures include, as appropriate, access controls, encryption, and secure storage.

13 Changes to this notice

We may update this notice from time to time to reflect changes in applicable law or the way the services are provided. The most recent version will always be available to you through the relevant screening process or upon request at gdpr@validato.com.