

## Candidate Privacy Notice

### What is the purpose of this document?

Sparta Systems, Inc. is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is relevant to you because you are applying for work with us (whether as an employee or worker). It makes you aware of how and why your personal data will be used (namely for the purposes of processing your job application) and how long it will usually be retained for.

If you are resident in the EU or are applying for a position from or to the EU, this privacy notice provides you with certain information that must be provided under the General Data Protection Regulation (GDPR).

If you are not resident in the EU or are not applying for a position from or to the EU, some of the provisions of this notice may not apply to you; however, in this instance our policy is always to comply with all applicable privacy and data protection laws in your jurisdiction, when processing your personal data.

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, employment history, qualifications.

- Any supplementary information that you may provide to us via our recruitment portal.
- Any information you provide to us during an interview.

## How is your personal information collected?

We may collect personal information about candidates from some or all of the following sources:

- You, the candidate.
- Your named referees, from whom we collect the following categories of data: information specific to job-related performance, qualifications and skills.
- Data from a public accessible source, which may include but is not limited to LinkedIn and Google.

## How we will use information about you?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the role(s) for which you are applying since it would be beneficial to our business to appoint someone to that role / those roles.

We will process your personal information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and confirm what further information and/or checks we may need before confirming your appointment (depending on the country of employment). For US candidates, once an offer has been extended, we will run a background check through a third-party background screening company.

We also need to process your personal information to decide whether to make you an offer of employment.

## If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application expeditiously or at all. For example, if we require references for a role and you fail to provide us with relevant details, we will not be able to take your application further.

## How we use particularly sensitive personal information

We will use your particularly sensitive personal information 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, for example whether adjustments need to be made during a test or interview or to plan possible employment accommodations.
- For US candidates, we will use information about your race or national or ethnic origin and gender to ensure meaningful equal opportunity monitoring and reporting. For EU candidates, such personal data will only be used where statutory reporting is required.

## Information about criminal convictions

If you are a US candidate, we may process information about criminal convictions.

If we make the decision to offer you a position, we will conduct a background check with a third-party screening company relative to criminal convictions history, specifically related to the position at Sparta Systems for which you are being considered.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## Automated decision-making

If you are resident in the EU or are applying for a position from or to the EU, you will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## Data sharing

### Why might you share my personal information with third parties?

We will only share your personal information with our affiliates (and for our US candidates, our background screening provider) for the purposes of processing your application. All other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from [compliance@spartasystems.com](mailto:compliance@spartasystems.com).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Data retention

### How long will you use my information for?

Unless applicable law permits to retain the data for a longer period, we will retain your personal information for a period of twelve months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy and applicable laws.

## Rights of access, correction, erasure, and restriction

### Your rights in connection with personal information

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information 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 personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [compliance@spartasystems.com](mailto:compliance@spartasystems.com) in writing.

## Right to withdraw consent

Where we process your personal information on the basis of your consent only, you have the right to withdraw such consent at any time. To withdraw your consent, please contact [compliance@spartasystems.com](mailto:compliance@spartasystems.com). Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

## Data protection contact

We have appointed a Director, Compliance to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Director, Compliance at [compliance@spartasystems.com](mailto:compliance@spartasystems.com). You have the right to make a complaint at any time to the applicable national data protection authority for data protection issues.