

Privacy Notice for recruitment

Confine Visual BidCo AB and its subsidiaries (“We”, “Us” “Vizrt ” etc.) are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with our recruitment processes. This Privacy Notice applies solely to personal data collected and processed as part of our recruitment process and is provided alongside our general privacy policy, available on our [website](#). Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

We use “Workable”, an online application provided by Workable Software Limited, to manage applications and assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

Where you apply for a job opening via the application function on a job site or similar online service provider (“Partner”), you should note that the relevant Partner may process your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Notice.

Definitions

Controller: Confine Visual BidCo AB acts as the primary data controller for group-level operations. However, the specific hiring entity within the Vizrt Group that posts a job or engages you as a candidate is considered the data controller for the recruitment process and is responsible for processing your personal data in compliance with applicable data protection laws.

Personal Data: Any information that relates to an identified or identifiable individual, such as name, contact details, employment history, qualifications, or other information provided during the recruitment process.

Data Processor: A third-party service provider that processes personal data on behalf of and according to the instructions of the Data Controller, such as Workable Software Limited, our recruitment platform provider.

Processing: Any operation or set of operations performed on personal data, whether by automated means or otherwise. This includes collection, recording, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, or destruction of personal data.

GDPR: The General Data Protection Regulation (GDPR) is the European Union’s data protection law, which provides guidelines for the collection, processing, and protection of personal data within the EU.

How We Collect Your Personal Data

When we collect your personal data

We collect personal data about you when you;

- make an application through Workable or otherwise, adding personal data about you either personally or by using a third-party source such as Facebook or LinkedIn;
- use Workable to connect with our staff, adding personal data about yourself either personally or by using a third-party source such as Facebook or LinkedIn; and
- provides identifiable data in the chat (provided through the website that uses Workable) and such data is of relevance to the application procedure.

Information We collect directly from you

We collect and process some or all of the following types of information from you:

- **Application details:** Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method, including details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, answers to questions asked through the recruiting, titles, education, skills and experience that you provide to Us, as well as your video in case you conduct your interview using the Video Interview feature.
- **Communications:** If you contact Us, We may keep a record of that correspondence.
- **Application progress;** Notes and updates on your progress in our hiring process.
- **Details of your visits to Workable's Website** including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access.
- **Your video interview** in case your interview was performed through the video interview feature.

Information We collect from other sources

Workable provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

Workable's technology allows Us to search various databases – some publicly available and others not, which may include your personal data (include your CV or Resumé), to find possible candidates to fill our job openings. Where We find you in this way We will obtain your personal data from these sources.

We may receive your personal data from a third party or existing employees who recommends you as a candidate for a specific job opening or for our business more generally.

Purposes of Processing Your Personal Data

Purposes of Processing

The purpose of the collecting and processing of personal data is to manage recruiting. We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that We receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings.

Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. our legitimate interests are the recruitment of staff for our business and to simplify and facilitate recruitment.

Where you apply for a job opening through the Indeed Apply functionality, We rely on your consent, which is freely given by you during the application process, to disclose your personal data to Indeed on the basis described above.

Automated decision making/profiling

We may use Workable's technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by our staff.

Consent for Future Opportunities

If you would like us to retain your personal data after the current hiring process, so we may contact you about future job opportunities within the Vizrt Group, we will do so on the basis of your explicit consent. This data will be securely stored for 24 months unless you request earlier deletion.

Disclosure of Your Information

As set out above, We pass your information to our third party service providers, including Workable, who use it only in accordance with our instructions and as otherwise required by law.

Where you have applied for a job opening through the Indeed Apply functionality, We will disclose to Indeed certain personal data that We hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that We hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

Where you have applied to a job opening through another service provider, We may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be

the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

How We store your personal data

Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

Where We store your personal data

Where We store your personal data in our own systems, it is stored European Economic Area ("EEA"). Our transfers of Personal Data are based on Our legitimate interest in fulfilling the purposes provided above and complying with applicable legal obligations. When transferring Personal Data to countries outside the EU/EEA, we use standard contractual clauses approved by the European Commission to ensure a sufficient level of protection for your Personal Data, unless another legal basis for the transfer applies, such as an adequacy decision by the EU Commission. The standard contractual clauses can be found via the following link: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en. Upon your request, you may receive a copy of those standard contractual clauses.

In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU. The US does not have the same data protection laws as the EEA or UK. A data processor agreement, including where required, Standard Contractual Clauses to ensure your data remains protected according to GDPR standards, has been signed between Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the EEA or UK or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Retention period

We will hold all the data for 24 months [from your application], in order to [include reason for this timeperiod. We need to justify why we need to keep it for 24 months which in general unless they have provided consent to stay on for future jobs seems like a long time].

Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you or anyone acting on your behalf; or
- receipt of a written request by you to us.

Your rights

Under the GDPR you have the following rights related to our processing of your Personal Data:

Right to lodge a complaint

If you have objections or concerns about how we process your Personal Data, you have the right to contact, or lodge a complaint with, the Swedish Authority for Privacy Protection, which is the supervisory authority for our Personal Data processing, or with the competent authority in the non-EU jurisdictions in which our foreign offices operate.

Right to information and access

You can request information regarding whether we are processing your Personal Data and ask to receive a copy of your Personal Data (known as a data subject access request or DSAR) together with certain additional information regarding how we process your Personal Data.

Right to rectification

If you believe that your Personal Data is inaccurate or incomplete, you can ask for it to be corrected or completed.

Right to object

You have the right to object to the processing of your Personal Data which is based on our legitimate interest. If we cannot demonstrate compelling and legitimate grounds to continue processing the Personal Data, we must cease the processing. You always have the right to object to our processing of your Personal Data for direct marketing purposes.

Right to restriction

In some cases, you have the right to request a restriction of the processing of your Personal Data, which means that the data is marked so that, in the future, it can only be processed for certain limited purposes. This is possible, for example, if you have objected to the processing, if you have disputed the accuracy of your Personal Data, or if the processing is unlawful. By requesting a restriction of our processing, you have the right to stop us from processing your Personal Data for a certain period of time for other purposes than, for example, to defend us against legal claims.

Right to erasure

In some cases, you may request that your Personal Data be erased. The right to erasure applies, for example, to Personal Data that is no longer necessary for the purpose for which it was collected, or to Personal Data that is processed on the basis of your consent if you choose to withdraw your consent. In certain circumstances, we may not be able to delete your Personal Data, for example, if

your Personal Data is needed to comply with a legal obligation, if it is still needed for the purpose for which it was collected, or if our interest in continuing to process the data outweighs your interest in having it deleted.

Right to transfer your Personal Data (data portability)

If we process your Personal Data to fulfill a contract or on the basis of your consent, you may, in certain cases, be able to obtain the Personal Data for use elsewhere, e.g. by obtaining a copy of it in a machine-readable format and transmitting it to another data controller.

Right to withdraw consent

In those cases where we process your Personal Data based on your consent, you have the right to withdraw your consent at any time. When you withdraw your consent, we will stop any processing of Personal Data which is based on your consent.

If you would like to exercise any of those rights, please:

- contact Us using our contact details below,
- let Us have enough information to identify you,
- let Us have proof of your identity and address, and
- let Us know the information to which your request relates.

Changes

If any changes are made concerning the processing of your Personal Data, we will inform you by publishing an updated version of this privacy notice on Workable's website.

How to complain

We hope that We can resolve any query or concern you raise about our use of your information. However, if you have unresolved concerns, you have the right to file a complaint with a data protection authority,

Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to privacy@vizrt.com