

## **Prospective Employee Privacy Notice**

Effective Date: July 31, 2020

This Prospective Employee Privacy Notice (“Prospect Privacy Notice”) applies to prospective employees and tells you how SevenRooms Inc. (“SevenRooms”, “we” or “us”) processes personal data in connection with the talent sourcing, application and selection process. It also describes your data protection rights, as set out more fully in the Your Rights section.

We may also provide you with additional information when we collect personal data, where we feel this would be helpful to provide relevant and timely information. For purposes of this Prospect Privacy Notice, “personal data” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data or that may independently, or in connection with other information, be attributed to you or used to identify you.

### **What Personal Data Do We Collect?**

SevenRooms collects and processes the following types of personal data about you in connection with its talent sourcing, application and selection process:

- Contact details: such as your name, home address, email address, phone number;
- Information relating to your career: such as job history, academic background, qualifications, professional and personal competencies and skills, job expectations;
- To the extent permitted under law in your jurisdiction, information about your history of remuneration & benefits and your salary expectations;
- Information relating to your employment references (you will have ensured you have obtained consent from your references prior to providing us the information);
- Information collected as part of the hiring process such as assessments and aptitude tests;
- Identification information, as part of the pre-hiring process: such as copies of identification documents, immigration status, and where permitted under law in your jurisdiction, information concerning your race and ethnicity (for diversity monitoring purposes); and
- Any other information you submit to us as part of the recruitment process.

SevenRooms is committed in leveraging each applicant’s skills and competencies to find the right match for a role in the organization as opportunities arise. Most often, the personal data we collect from employees and employee applicants is collected from them directly. In some cases, we may collect personal data about employees and employee applicants from third parties, for example, when we perform background checks that are necessary for the role to be performed by the employee. In most circumstances, we will get your permission before we collect personal data about you from a third party.

If we ask you to provide any other personal data not described above, then the personal data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect it.

If you are hired, SevenRooms will retain your personal data for the course of the employment relationship and, to the extent permitted by law in the applicable jurisdiction(s), after termination of employment. The protection of your personal data will then be governed by the SevenRooms Employee Handbook 2020 containing privacy provisions for employees.

If your application is not successful, we may retain and use your personal data for a further fixed period in accordance with our record retention protocols in order to consider you for other job opportunities where permitted by applicable law and/or for as long as necessary to comply with legal record retention requirements. If you do not wish us to retain your personal data, please contact us at the email address set forth in the Contact Us section below. Please note, however, that some information may be retained as necessary to comply with our legal obligations and otherwise as permitted under applicable law.

### **Why Do We Collect, Use and Store Personal Data?**

SevenRooms processes your personal data for the following purposes:

- As required to establish and perform the employment contract. This includes processing your application for a specific job;
- For our legitimate interest in recruiting and hiring qualified applicants, complying with laws and regulations that govern our conduct in the countries where we operate, and administering SevenRooms and its programs in an efficient, ethical, and appropriate manner. We process information we collect from or about you to serve such interests, including for the purposes listed below where our interests are not overridden by your data protection rights:
  - Sourcing talent and administrating the recruitment process;
  - Managing the selection process and making an appropriate employment offer;
  - Protecting our legitimate business interests and legal rights;
  - Analyzing and monitoring the diversity of our applicants in accordance with applicable laws (including, for example, for purposes of compliance with equal opportunity employment laws); and
  - Carrying out background checks to verify the details you have supplied during the recruitment process;
- Where required by applicable laws, immigration documentation is processed to ensure the candidate is entitled to work on the territory where the job is located; and
- To comply with specific provisions of law concerning personal data processing at work or for reasons of substantial public interest as determined by local law.

## **International Transfers**

Personal data will be transferred to our parent company, subsidiaries, joint ventures, or other companies under common control (“affiliates”) and service providers, including transfers outside the EU and the UK and/or Switzerland, to countries with respect to which an adequacy determination has been made by the European Commission or where SevenRooms has adequate safeguards in place or, in the case of the U.S., subject to Privacy Shield. Personal data will be stored and processed manually and electronically through global systems and tools for the purposes above.

## **How Is Your Personal Information Shared?**

We share some of your information with our affiliates to administer and manage the talent sourcing and recruitment process. Where this requires us to transfer your personal information from inside the EU to a non-EU jurisdiction, please refer to the International Transfers Section above for further details on cross-border transfers.

Your personal data will also be shared with companies providing services under contract to the SevenRooms companies such as software and data storage providers. In addition, it may also be shared with government authorities, regulators and/or law enforcement officials if required for the purposes above, if mandated by law and if required for the legal protection of SevenRooms’ legitimate interests in compliance with applicable laws.

We may share some or all of your personal data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, personal data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the personal data collected by us and will assume the rights and obligations regarding your personal data as described in this Prospect Privacy Notice.

We do not sell or otherwise make available your personal data to another business or third party for consideration.

## **How do we protect your personal data?**

SevenRooms has taken appropriate technical, administrative, physical and procedural security measures, consistent with local and international information practices, to protect your personal data from misuse, unauthorized access or disclosure, loss, alteration, or destruction. These measures include:

- Physical safeguards, such as locked doors and file cabinets, controlled access to our facilities, and secure destruction of media containing personal data;

- Technology safeguards, such as use of anti-virus and endpoint protection software, passwords, encryption, and monitoring of our systems and data centers to ensure compliance with our security policies;
- Organizational safeguards, through training and awareness programs on security and privacy, to ensure employees understand the importance and means by which they must protect personal data, as well as through privacy policies and policy standards that govern how SevenRooms treats personal data.

## **Your rights**

You have the right to ask SevenRooms for a copy of your personal data, to correct, delete or restrict processing of your personal data; and to obtain the personal data you provide in a structured, commonly used machine-readable format.

In addition, you can object to the processing of your personal data in some circumstances (in particular where we don't have to process the personal data to meet a contractual or other legal requirements).

Where we have asked for your consent, you may withdraw consent at any time. If you elect to withdraw your consent to our processing of your personal data, this will not affect any processing which has already taken place at that time.

There are exceptions to these rights such that access may be denied, for example, if making the information available would reveal personal information about another person or if SevenRooms is legally prevented from disclosing such information. Relevant exemptions are included in both the General Data Protection Regulation (Regulation EU 2016/679) and in local data protection laws. We will inform you of relevant exemptions we rely upon when responding to any request you make.

If you have unresolved concerns, you have the right to complain to the data protection authority in the country where you live, work or where we are located (if such an authority exists in such jurisdictions). You may also be able to seek a remedy through the courts if you believe that your rights have been breached.

Any aptitude tests taken form part of the application process but are not solely determinative of your outcome or success.

It is important that we maintain up to date records of key information on you. Please notify us of any changes in your personal data as soon as they occur (e.g., change of address).

Where we require personal data to comply with legal or contractual obligations, then provision of such personal data is mandatory. If such personal data is not provided, then we will not be able to manage the recruitment process or meet obligations placed on us.

You can exercise your rights by using the contact details below.

### **Updates To This Prospective Privacy Notice**

This Prospect Privacy Notice may be updated periodically. We will update the date at the top of this Prospect Privacy Notice accordingly. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Prospect Privacy Notice as required by applicable law.

### **Contact Us**

The data controller for your personal data will be SevenRooms Inc. and, if applicable, the SevenRooms affiliate company that you are applying to for a job.

If you have questions about this Prospect Privacy Notice or wish to contact us for any reason in relation to our personal data processing, please contact us at [privacy@sevenrooms.com](mailto:privacy@sevenrooms.com) or at the address or telephone number set forth below.

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