

CG-DPR-GUI-003	PRIVACY WEB NOTICE
Rev 01	CLINGLOBAL RECRUITMENT PRIVACY WEBSITE NOTICE

1 PURPOSE

When applying for a position at Clinglobal or any of our partner companies, Applicants need to Consent for the collection and processing of their Personal Data. This document serves to inform Applicants about the specific details of how their Personal Data will be collected, used, stored, and processed throughout the entire recruitment process.

2 SCOPE

This Privacy Notice applies to Applicants who have submitted their applications for positions at Clinglobal and Partner Companies through the Company Human Resources Management System (HRMS) for publicly posted vacancies, as well as to Company personnel involved in the recruitment process.

The Company reserves the right to update this Privacy Notice periodically to align with best practices in data management, security, and control, and to maintain compliance with any changes or amendments to applicable laws and regulations. The most recent version of this Privacy Notice will be accessible on the Clinglobal website.

3 DEFINITIONS

Company	Clinglobal and its Partner Companies
Applicant	The person who has expressed interest in a job vacancy by formally submitting an application or resume for the position.
Consent	Any freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her.
Controller	The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law.
Data Subject	An identifiable natural person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
Data Protection Laws	The relevant local data protection legislation in the country where Clinglobal and Partner Companies operate.
Partner Company	Any Company, Trust or entity that chooses to adopt this Notice by publishing vacancies on the HRMS.
Personal Data	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly

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	or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
Processing	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
Processor	A natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Controller.
Regulator	The information or data protection Regulator established in terms of a regulation or relevant legislation.
Sensitive Personal Data	Sensitive Personal Data is information on racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, health, sex life and sexual orientation, and genetic or biometric data.
Third Party	A natural or legal person, public authority, agency, or body other than the Data Subject, Controller, Processor, and persons who, under the direct authority of the Controller or Processor, are authorized to process Personal Data.

4 PROCEDURES/USE

All job vacancies within the Company are posted on the Company's HRMS, which can subsequently be advertised on the Company website, social platforms, and other public and internal communications. Applications for vacant positions, which contain the Personal Data of Applicants (the Data Subject), are processed within the HRMS by Clinglobal, the Controller.

4.1 Collection of Personal Data

The Personal Data collected and processed by the Company during the recruitment process depends on the specific purpose for which it is needed. We only gather and process Applicant data that is essential for recruitment purposes.

Applicants provide Personal Data directly when submitting their applications through the HRMS. This data is typically found in the uploaded *Curriculum Vitae* (CV) or resume, as well as in the answers provided in the application form.

The Company may collect, process, and maintain the following categories of Applicant Personal Data:

4.1.1 Categories of Personal Data

- **Contact details:** First name, surname, address, email address, telephone number, *et cetera*.

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- **Individual details:** Gender, nationality, date of birth, age, language, marital status, *et cetera*.
- **Educational and professional background:** CV/resumé, academic and professional qualifications, employment history, interview notes, training information, *et cetera*.
- **National identification details:** Personal Identification or passport number inclusive of citizenship details.
- **Special categories of Personal Data/ Personal Data on vulnerable persons:** Personal Data concerning health and disability.
- **Criminal conviction record:** Personal Data related to criminal offences.
- **References:** Personal Data shared regarding the Applicant by references provided by the Applicant.
- **Other Data:** Information the Applicant may choose to share such as skills, experience, hobbies and social preferences.

Sensitive Personal Data collected by the Company, falling into special categories of Personal Data, is typically obtained on a voluntary and consensual basis. Applicants are not obligated to provide this information unless it is specifically required for the recruitment process. For instance, the Company may request health or disability information if it is relevant to the recruitment requirements for a position or if the Applicant requests accommodation.

When data provided by the Applicant contains details of racial or ethnic origin, political opinions or beliefs, religious beliefs, membership in a trade union or political party, physical or mental health or condition, sexual orientation, commission or alleged commission of an offense or related proceedings, the Applicant expressly authorizes the Company to handle such data in accordance with this guideline.

4.2 Personal Data Use

The Company will solely utilize Applicant Personal Data for the explicit purpose for which it was collected or as agreed with the Applicant. In the event that an Applicant is hired by the Company, additional necessary Personal Data may be collected in connection with their employment.

The Company will refrain from employing Applicant Personal Data in any automated individual decision-making processes that could significantly impact the Applicant.

Below, we outline the legal basis for processing Personal Data for each specific purpose. Please note that the Company may process Applicant Personal Data based on more than one lawful ground, contingent on the particular purpose for which the data will be used.

Purpose of processing	Legal basis of processing
As required for the recruitment process: <ul style="list-style-type: none"> • for communicating with the Applicant • to analyze qualifications, previous employment, and references 	<ul style="list-style-type: none"> • The processing is necessary to perform a contract or to take steps at the Applicant request, before entering a contract, namely the contract of employment.

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Purpose of processing	Legal basis of processing
<ul style="list-style-type: none"> to conduct candidate screening and assess candidate credibility based on job related questions. to set out job terms and conditions 	<ul style="list-style-type: none"> For our legitimate interests, namely for the proper administration of business and to ensure appropriate job candidates are being recruited.
<ul style="list-style-type: none"> to know whether there are previous criminal convictions and/or credit ratings recorded against the Applicant. to assess whether the Applicant is medically fit for duty, and to cater for special accommodations in case the Applicant provides additional data about health condition/s 	<ul style="list-style-type: none"> The processing is necessary for the assessment of the working capacity of an employee. The processing is necessary for the purpose of carrying out Company obligations and of exercising specific rights in relation to employment. Consent
<ul style="list-style-type: none"> Storing Applicant CVs/resumes and contact details to contact the Applicant in the event there are future job opportunities. 	<ul style="list-style-type: none"> Consent

Applicants should contact the DPO if in need of details about the specific legal ground the Company relies on to process Applicant Personal Data where more than one ground has been mentioned.

4.2.1 Cross border transfers

The Company has established global data security practices to ensure the appropriate protection of Personal Data. Personal Data may be transferred, accessed, and stored globally as needed for the purposes and disclosures specified in this Notice.

In cases where recipients of such data are in foreign countries, including our affiliates and other third parties, the Company has implemented and executed agreements for the international transfer of Personal Data (Cross-border Agreements). These agreements enable the processing of Applicant Personal Data and incorporate the requirements of the European Union Model Clauses for the transfer of Personal Data.

4.3 Voluntary Disclosure of Personal Data

The Applicant is responsible for the data provided or made available and must ensure its honesty, truthfulness, accuracy, and freedom from any misleading information. The data should not contain material that is obscene, defamatory, infringing upon the rights of third parties, malicious code, or anything that is otherwise legally actionable.

Additionally, if an Applicant provides data regarding any other person, such as individuals listed as references, they are responsible for providing necessary notices and obtaining the required Consent for the Company to collect and use that data as described in this Notice.

Company employees who have access to Applicant Personal Data are bound by confidentiality requirements and are only permitted to use the data for its intended purposes.

With the exception of situations stated otherwise in this Notice or when required for legal or regulatory purposes, the Company treats Applicant Personal Data as confidential and will not disclose it to third

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parties without the Applicant's explicit Consent. Personal Data is not shared with service providers or other Third Party for recruitment purposes unless the employment application is successful, and the Company extends an offer of employment.

However, the Company may share Applicant Personal Data with public and government authorities when required by applicable laws and regulations for reasons of national security and/or law enforcement.

4.4 Security of Personal Data

The Company has implemented appropriate security measures to safeguard Personal Data from accidental or unlawful destruction, loss, alteration, or any unauthorized disclosure or access. Security procedures may be applied to Company facilities and computer systems to monitor and maintain security. Any monitoring of facilities, systems, or assets is conducted in compliance with applicable laws.

The Company has established procedures to address any suspected data security breaches. In cases where legal requirements necessitate it, the Company will notify the Applicant and the Data Protection Officer (DPO) of any suspected breaches.

4.5 Applicant Data Protection Rights

Under Data Protection Laws, Applicants have specific rights related to the Personal Data they provide. These rights depend on the reasons for processing Personal Data.

4.5.1 The right of access to own Personal Data

Applicants have the right to request a copy of their Personal Data held by the Company. To make this request, contact the DPO and specify the desired data. The Company will take reasonable steps to confirm the requester's identity before disclosing any Personal Data. Accessing Personal Data is typically free, but the Company may charge a reasonable fee for unfounded, repetitive, or excessive requests or may refuse unreasonable requests.

4.5.2 The right to rectification of own Personal Data

Applicants can request updates or corrections to their Personal Data if it is inaccurate or incomplete. The Company will verify the identity of the Applicant before making changes to the retained data. Requests for correction or any other Personal Data-related inquiries can be directed to the DPO.

4.5.3 The right to erasure of own Personal Data

Applicants may request the Company to delete their Personal Data under specific circumstances, including when the data is no longer needed for recruitment, when Consent has been withdrawn, if the Applicant objects to data use, if the data was collected unlawfully, or when a legal obligation exists. Personal Data will not be retained longer than necessary unless required for legitimate business or legal purposes. Upon the specified expiration date, Personal Data will be securely destroyed according to the Company retention periods.

4.5.4 The right to restriction of processing

Applicants can request the Company to limit how their Personal Data is used or prevent its deletion. To exercise this right, contact the DPO and state the reasons for the request. Restriction may apply in various situations, such as disputing data accuracy or wanting data to be retained for legal claims.

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4.5.5 The right to object to processing

Applicants also have the right to object to the processing of their Personal Data in specific circumstances, including tasks in the public interest, the Company's legitimate interests, scientific or historical research, statistical purposes, or direct marketing. The Company currently processes Personal Data for legitimate interests only. To object to further data processing, contact the DPO and explain why the Company should cease using the data in this manner. Unless the Company has a strong legitimate reason to continue using the data despite the objection, data processing will stop according to the objection.

4.5.6 The right to data portability

The right to data portability allows Applicants to request the transfer of their Personal Data from one organization to another or to themselves. This right applies when the Company processes information based on the Applicant's Consent or contract performance, and the processing is automated. To exercise this right for data provided to the Company, contact the DPO. The Company will ensure that the Personal Data is provided in an accessible and machine-readable format.

4.5.7 The right to withdraw Consent

If the legal basis for the Company's processing of the Applicant's personal information is Consent, the Applicant has the right to withdraw that Consent at any time. The withdrawal will not affect the lawfulness of processing that occurred before the withdrawal.

4.6 Personal Data Retention

Where the Company collects and processes the Applicant's Personal Data for a specific purpose, it will not retain that data for longer than necessary to fulfill that purpose, unless there are legitimate business or legal reasons requiring otherwise. To the extent permitted or required by law, the Company may delete the Applicant's Personal Data at any time. Consequently, Applicants are advised to keep a copy of any data they submit to the Company.

The Company will maintain all recruitment data, including unsuccessful applications, for a period of 3 years. At the end of this period, applications will be deleted or destroyed. If an Applicant's employment application is successful, Personal Data collected during the recruitment process will be transferred to a personnel file and retained during employment. The specific durations for which employee Personal Data will be held are outlined in related employee policies.

During the recruitment process, Applicants may submit requests to access or correct their submitted Personal Data or any other requests concerning their Personal Data to the DPO at dpo@clinglobal.com.

4.7 Dispute Resolution

If the Applicant has any complaints regarding the Company's compliance with this guideline, they should report it to the DPO. The DPO will investigate and attempt to resolve complaints and disputes concerning the use and disclosure of Personal Data in accordance with this Notice. If the Applicant believes that the Company has not handled their requests appropriately, they have the right to lodge a complaint with the DPO.

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5 REFERENCES

Relevant local legislation in the country of operation:

- European Union, General Data Protection Regulation 2016 (GDPR)
- Mauritius, Data Protection Act 2017 (DPA)
- South Africa, Protection of Personal Information Act 2013 (POPI)
- Morocco, Law No 09-08 (of 18 Feb 2009) relating to protection of individuals with regard to the processing of Personal Data and its implementation Decree n° 2-09-165 (of 21 May 2009)
- New York State, Information Security Breach and Notification Act, NYS Stop Hacks and Improved Electronic Data Security Act (SHIELD) Subdivisions 1, 2, 3, 5, 6, 7, 8, 9, and 10 of section 899-aa of the general business law
- United States, The Health Information Portability and Accountability Act, as amended (HIPAA) (29 U.S. Code § 1181 et seq.)
- United States, EEOC Privacy Act of 1974, 5 USC 552a
- Sri Lanka, Personal Data Protection Act, No. 9 of 2022