

Concentrix

Recruitment Data Protection Notice

The Concentrix Affiliate located in Estonia that will be recruiting you for a specific job position will be the Controller responsible for the use of your Personal Data (“**Concentrix Affiliate**”, “**we**”, “**us**” or “**our**”). Concentrix Affiliate provides this Recruitment Data Protection Notice (“**Notice**”) to explain our practices of the collection, processing and use of personal data relating to candidates or other prospective employees of Concentrix Affiliate in connection with the recruitment and hiring activities.

This Notice covers the provisions of the new European General Data Protection Regulation (“**GDPR**”) and the local data protection legislation. The Notice replaces any existing Recruitment Data Protection Notice. Where a material change is made to the content of this notice, such changes shall be communicated in an amendment or supplement to this notice.

The term personal data in a broad sense can be understood as any information relating to an identifiable or non-identifiable natural person. An identifiable person is one who can be identified directly or indirectly, in particular by reference to an identifier such as name, an identification number (e.g. IP address, employee ID) or location data.

The term "processing" refers to all uses or operations carried out on personal data. The term covers all actions related to the processing of personal data such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination, transfer or any other way of making available, aligning or combining, restricting, erasing or destroying. The processing includes requesting information from a person, logging and analyzing network traffic, and accessing databases.

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1. Perimeter

This notice applies to you if you are a job applicant or other potential employee of Concentrix Affiliate.

2. Categories of personal data

Concentrix Affiliate collects, processes and uses the following categories of personal data about you, from you or from authorized third parties (e.g., individuals you have designated as references, your former employers, schools, authorities or public resources) in connection with recruitment and hiring activities (collectively, “**Recruitment Data**”):

- **General information about the applicant**, including full name, academic title(s), gender, email address;
- **Additional personal information**, including former surnames, date and place of birth, marital status, private contact information (e.g., home address, home telephone number), photo, language skills;
- **Passport and similar information (only if necessary and to the extent required by law)**, including information regarding national identity card, passport information, nationality or citizenship, work permit information (e.g., type and status, validity date), visa information (e.g., type and status, validity date), student status;
- **General contract and employment information**, including type of contract (e.g., permanent, temporary, fixed-term), employment start date, educational background, work experience and abilities (e.g., resume, previous education), job applications, employment history, references, expected compensation, any correspondence with you (e.g., mail, emails);
- **Additional information that you provide on a voluntary basis**, including information contained in the materials you provide.

Should you be successful in the application process and be granted the position, we may also process special categories of personal data and other sensitive information about you (only if required in the course of the recruitment process and to the extent permitted by applicable law), such as information regarding disability (voluntary; for additional days off) and/or information on religious beliefs and/or information about criminal convictions and offences (collectively, “**Sensitive Data**”). A dedicated Employee privacy Notice will be provided to you to further detail how we use your personal data as an employee.

3. Purposes of processing, legal bases for processing and consequences

Recruitment Data and Sensitive Data are collected, processed, and used for the following purposes (collectively, “**Processing Purposes**”). In addition, Concentrix Affiliate relies on the following legal bases for the collection, processing and use of personal data:

Purposes of the processing	Legal basis
Recruitment and hiring activities , including managing your recruitment, making a hiring decision (including assessing qualifications and following up with candidates during the application process), security assessments (including criminal and credit record checks where permitted by local law), and conducting interviews) and completing the hiring process in the event that a position with Concentrix Affiliate is suitable for you would be proposed and accepted (including onboarding and re-hire activities)	• The processing is necessary in order to take steps at the request of the data subject prior to the conclusion of a contract, (Art. 6(1)(b) GDPR) • Where applicable, your (explicit) consent that meets the requirements of local data protection law and has been obtained separately (Art. 6(1)(a) GDPR) and, for Sensitive Data, Art. 9(2)(a) GDPR) • The processing is necessary for the purposes of the legitimate interests of Concentrix Affiliate (Art. 6(1)(f) GDPR) as set out in the first column • The processing is necessary (i) for compliance with a legal obligation to which Concentrix Affiliate is subject (Art. 6(1)(c) of the GDPR and any local legislation) and/or (ii) for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR and any local legislation) • Regarding sensitive data: The processing is necessary in order to implement obligations and to exercise certain specific rights of Concentrix Affiliate or of yourself in the field of employment,

	social security, and social protection legislation (Art. 9(2)(b) GDPR and the provisions of the GDPR and the corresponding provisions of the local data protection legislation)
To comply with applicable laws and employment-related requirements and manage those requirements, such as employment and immigration laws	• The processing is necessary in order to comply with the applicable legislation that Concentrix Affiliate must comply with (Art. 6(1)(c) GDPR) • The processing is necessary for the purposes of the legitimate interests of Concentrix Affiliate (Art. 6(1)(f) GDPR) as set out in the first column • Regarding Sensitive Data: The processing is necessary in order to implement obligations and to exercise certain specific rights of Concentrix Affiliate or of yourself in the field of employment, social security, and social protection legislation (Art. 9(2)(b) of the GDPR and the corresponding provisions of the local data protection legislation).
To communicate with you, within the Concentrix Group, and/or with third parties	• The processing is necessary in order to take steps at the request of the data subject prior to the conclusion of a contract, (Art. 6(1)(b) GDPR) • The processing is necessary in order to comply with the applicable legislation that Concentrix Affiliate must comply with (Art. 6(1)(c) GDPR) • The processing is necessary for the purposes of the legitimate interests of Concentrix Affiliate (Art. 6(1)(f) GDPR) as set out in the first column
To respond to and comply with requests and legal requirements from regulators or other authorities	• The processing is necessary for the purposes of the legitimate interests of Concentrix Affiliate (Art. 6(1)(f) GDPR) as set out in the first column • The processing is necessary in order to comply with the applicable legislation that Concentrix Affiliate must comply with (Art. 6(1)(c) GDPR) • Regarding Sensitive Data: The processing is necessary in order to implement obligations and to exercise certain specific rights of Concentrix Affiliate or yourself in the field of employment, social security, and social protection legislation (Art. 9(2)(b) GDPR and the provisions of the GDPR and the corresponding provisions of the local data protection legislation)

The provision of Recruitment Data and Sensitive Data as described in this notice is partly a legal requirement, partly a (pre-)contractual requirement under our recruitment website, and partly a requirement to carry out the recruitment and hiring process with you. Generally, you are required to provide this Recruitment Data, except in limited cases where we indicate that certain information is provided freely (e.g., in connection with employee benefits). Failure to provide Recruitment Data and Sensitive Data may prevent Concentrix from carrying out

recruitment and hiring activities as they relate to you and may cause Concentrix Affiliate to terminate and disregard your application for potential employment with Concentrix.

4. Categories of Recipients and International Transfers

You should expect us to transfer your Recruitment Data and Sensitive Data (in particular with respect to Sensitive Data only to the extent permitted by applicable law) to third parties for processing as follows:

- **Within the Concentrix Group:** Our parent company, Concentrix Corporation (44111 Nobel Drive, Fremont, California 94538, USA) and each of its subsidiaries and affiliated entities (Concentrix Corporation and each of its subsidiaries and affiliated entities, included in the Concentrix Group, referred to as the “**Concentrix Subsidiary Entities**”; as a whole, the “**Concentrix Group**”) may receive your personal data if this is necessary for the purposes of the processing set out above, in particular for general human resources management, monitoring and in the course of the recruitment process and/or keep your information in the Concentrix talent pool to inform you about further and future job offers in the Concentrix Group.
- **With certain entities in the process of being acquired or already acquired:** If Concentrix Affiliate, as an entity where you are seeking employment, is sold or transferred in whole or in part, or if the Concentrix Group acquires and integrates the entity where you are seeking employment (or if a transaction of this nature is contemplated), your personal data will be transferred to that other entity (e.g., the prospective new employer, newly acquired entity or prospective acquired entity) prior to the transaction (e.g., during the due diligence phase) or after the transaction, subject to rights under applicable law, including in jurisdictions where the other entity is located.
- **With Data Processors:** Certain third-party service providers, such as affiliated or unaffiliated IT support or HR support providers, will receive your personal data to process such data under the appropriate instructions (“**Processors**”) necessary for the purposes of the processing, in particular to conduct recruitment and hiring activities, comply with applicable laws and employment-related requirements, as well as other activities. Processors will be subject to contractual obligations and must implement appropriate technical and organizational security measures in order to protect personal data, and to process it only as instructed.

Access to your personal data is limited to those who need to know it in order to carry out their job responsibilities. Concentrix will also disclose your personal data, to the extent required or permitted by law, to legal or business consultants, government authorities and courts.

5. International Transfers

You should expect that the recipients identified above, who will receive or have access to your personal data, will be located inside or outside the European Economic Area (“**EEA**”).

- With regard to **Concentrix Subsidiary Entities** recipients located outside the EEA, some are located in countries that have adequacy decisions in accordance with Art. 45 GDPR (“hereafter “**Adequate Countries**”) such as the UK. For Concentrix Affiliates/Subsidiary Entities located in non-EEA countries or non “**Adequate Countries**”, the transfers of your personal data is based on an Intra-Group Data Transfer Agreement embedding the local EEA Authorities standard contractual clauses or on Binding Corporate Rules (Controller) formally approved by the European data protection authorities. The relevant Concentrix recipients using the BCR-Controller are listed in Appendix 1 of the BCR-Controller available if you click [here](#)).
- **Other recipients involved in the recruitment process (which are not part of the Concentrix Group)**, are located in non-EEA and non-Adequate Countries (e.g., our IT Workday storing the data in the US, potential recruitment agencies). In such case we have implemented all necessary steps to ensure that transfers out of the EEA are adequately protected in accordance with applicable data protection legislation. Such transfers are based on the standard data protection clauses adopted by the European Commission or by a supervisory authority (Article 46(2)I or (d) of the GDPR

6. Retention Period

Your personal data is stored by Concentrix Affiliate and/or our service providers, to the extent strictly necessary

for the performance of our obligations and exclusively for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. When Concentrix Affiliate no longer needs to use your personal data, we will delete it from our systems and records and/or take appropriate steps to anonymize it so that it no longer identifies you (unless we need to retain your information to comply with legal and regulatory obligations to which we are subject).

As a general rule, Concentrix Affiliate may retain your personal data for 2 years if you consent to this in order to be considered for other positions at Concentrix Affiliate or at another company of the Concentrix Group. In case of an unsuccessful application, we will delete your Recruitment Data and Sensitive Data 6 months after a negative hiring decision by Concentrix Affiliate or after you have rejected an offer from Concentrix Affiliate. Sensitive Data may be deleted earlier than the 6-month time-period above-mentioned should you have withdrawn your application beforehand.

If you accept an offer from Concentrix Affiliate, your Recruitment Data and Sensitive Data will be retained in accordance the applicable data retention period mentioned in the Employee Privacy Policy that will be provided to you.

7. Your rights

Right to withdraw your consent: If you have given your consent in relation to certain types of processing activities, you may withdraw that consent at any time and this withdrawal will take effect at a later date. Such withdrawal will not affect the lawfulness of processing prior to the withdrawal of consent. You can withdraw your consent in the following ways: email at dpo@concentrix.com.

Additional Data Privacy Rights: In accordance with data protection law, you have the right to: (i) request access to your personal data; (ii) request rectification of your personal data; (iii) request erasure of your personal data;

(iv) request restriction of the processing of your personal data; (v) request data portability; and/or (vi) object to the processing of your personal data. Below you will find further information about your rights insofar as the GDPR applies. Please note that these rights may be limited under applicable local data protection law.

- **Right to request access to your personal data:** In accordance with applicable data protection law, you have the right to request confirmation from us as to whether your personal data is being processed and, where applicable, to request access to your personal data. The information on access covers, among other things, the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of others may restrict your right of access.
You also have the right to obtain a copy of the personal data being processed free of charge. If you request additional copies, we may charge you a reasonable fee based on the amount of the administrative fee incurred.
- **Right to request rectification:** In accordance with applicable data protection legislation, you have the right to ask us to rectify your inaccurate personal data. For the purposes of the processing, you have the right to complete incomplete personal data, including by providing an additional statement.
- **Right to request erasure (right to be forgotten):** In accordance with applicable data protection legislation, you have the right to ask us to erase your personal data, and we may be obliged to erase it.
- **Right to request restriction of processing:** In accordance with applicable data protection legislation, you have the right to ask us to restrict the processing of your personal data and we may be obliged to comply with your request. In this case, the respective data will be marked and can only be processed by us for certain purposes. Since Concentrix processes and uses your personal data primarily for the purpose of carrying out the (pre)contractual recruitment relationship with you, Concentrix will in principle have a legitimate interest in the processing that will prevail over your restriction request, unless the restriction request relates to marketing activities.
- **Right to request data portability:** In accordance with applicable data protection legislation, you have the right to receive the personal data concerning you, and which you have provided to us, in a structured, commonly used and machine-readable format, and you may have the right to transmit such personal data to another entity without objection from us, when the processing is carried out by automated means

and is based on consent, in accordance with Art. 6(1)(a) GDPR, Art. 9(2)(a) GDPR, or on the basis of a contract concluded pursuant to Art. 6(1)(b) GDPR.

- **Right to object:**

In some cases, you have the right to object, on grounds relating to your specific situation, to the processing of your personal data, in which case we are obliged to stop processing your personal data.

If you have a right to object and exercise this right, we will no longer process your personal data for these purposes. You can exercise this right by contacting us as set out in section 8 below.

More specifically, you will not have such a right to object if we process your personal data as part of the hiring process.

To exercise your rights, please contact us as set out in Section 8 below.

You also have the right to lodge a complaint with the competent data protection supervisory authority in the respective member state (e.g. your place of residence, work or alleged violation of the GDPR).

8. Questions & Contact Information and/or Exercising your Rights

If you have any questions about this Notice or would like to exercise your rights as set out above in Section 7, please contact us at dpo@concentrix.com.