



# Privacy Notice



## WHAT IS THE PURPOSE OF THIS DOCUMENT?

Exness Global Ltd is a “data controller” which means that we are responsible for deciding how we hold and use personal information about you. You are being notified about this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (EU) 2016/679 (GDPR).

Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Notice applies to the personal data of our candidates, worker or contractor, and other people whom we may contact in order to find out more about our candidates or whom they indicate as a referee.

We may amend this Privacy Notice from time to time. Therefore, please visit [exness-careers.com](https://exness-careers.com) if you want to stay up to date as we will post any changes here.

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 purpose 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 on our application form, including name, surname and email;
- The information you have provided in your curriculum vitae or letter of intent along with any photos and comments relevant to the application;
- Any information you provide to us during an interview including information in the recommendation letter;
- Any information you provided via an email to us;
- Any information included as part of the application process, such as test results (grades, diplomas etc)

We may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests: Name, contact details, education details, employment history, referee details, immigration status (whether you need a work permit), details about your current remuneration, pensions and benefits arrangements, information on your interests and needs regarding future employment, extra information that you choose to tell us, extra information that your referees choose to tell us about you.

We need a small amount of information from our workers and contractors to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

If you would like a more detailed description of the personal data that we collect about you, please see further below in this document.

Our offices have CCTV cameras positioned at the entrances and in line with the relevant law, therefore CCTV footage and other information obtained through electronic means (in and out date/time, Images/live camera feed) may be collected if you visit our premises for legitimate interest for the security and safety of the Company's premises and assets.



## **HOW IS YOUR PERSONAL DATA COLLECTED?**

We collect personal information about candidates from the following sources:

- You, the candidate
- You, the worker or contractor
- Executive search and recruitment agencies, staff outsourcing entities or personal recommendations, from which we collect the following categories of data: CV and contact details
- Your named referees, from whom we collect the following categories of data: your CV (if applicable) and contact details
- If you “like” our page on Facebook or LinkedIn or “follow” us on Instagram we will receive your personal information from those sites.

## **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 work or role you have applied for;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Track your application and keep records related to our hiring processes;
- Comply with legal and regulatory requirements;
- To help us to establish, exercise and defend legal claims;
- Store your details on our database, so that we can contact you in relation to recruitment;
- To prevent unauthorised access or control access to our offices and to ensure the security, the safety of staff and visitors, as well as property and information located or stored on the premises;

We will not process your data for sending you targeted, relevant marketing materials or other communication which we may consider to be of interest to you. For marketing related activities, we will require your specific consent.

It is our legitimate interest to decide whether to appoint you to (role or work) since it would be beneficial to our business to appoint someone to that (role or work).



We also need to process your personal information to decide whether to enter into a contract of service or contract for services with you.

Having received your CV and/or letter of intent, we will then process that 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 (or work). If we decide to offer you the role (or work), we will then take up references before confirming your appointment.

### **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 qualification or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with the relevant details, we will not be able to take your application further.

We envisage that we will not process information about criminal convictions for the purpose of recruitment.

### **AUTOMATED DECISION MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making

### **DATA SHARING**

We will only share your personal information with any member of our group (together “Exness companies”), with search consultancy, our software providers, and tax, audit, or other authorities for the purposes of processing your application. All our third-party service providers and 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 specific purposes and in accordance with our instructions.

**Transfer of data.** As Exness operates a business internationally, we may transfer your personal data outside the European Economic Area (the “EEA”) to other Exness companies and software service providers. For example, your personal information may



be processed by staff in the Exness companies operating outside the EEA who for/with us or other Exness companies, by Greenhouse Software, Inc, provider of our candidate's software application and by Bamboo HR, our HR system. To the extent we transfer your personal information outside the EEA, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place. Moreover, we will ensure that the processors in third countries are obliged to comply with the European data protection laws or other countries' law which are comparable and to provide appropriate safeguards in relation to the transfer of your data in accordance with the provision of the GDPR.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and 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.

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**

We will retain your personal information for a period of 2 years after we have communicated to you our decision about whether to appoint you (to role or work). After this period, we will securely destroy your personal information in accordance with our data retention policy unless the law or other regulation requires us to preserve it (for example in the event of a legal claim, to be able to show that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way). In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes.

## **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, you contact us at [dataprotection@exness.eu](mailto:dataprotection@exness.eu).

### **Contacting us about this Privacy Notice or making a complaint**

If you have any queries about the content of this Privacy Notice, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us at email:

[dataprotection@exness.eu](mailto:dataprotection@exness.eu)

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint directly with our supervisory authority, the Office of the Commissioner for



Personal Data Protection (the “Commissioner”). Further information is available on the Commissioner website at <http://www.dataprotection.gov.cy>.

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