

1. What Does this Notice Cover?

- 1.1. This Talent Acquisition Privacy Notice ("**Notice**") is for prospective employee candidates (full or part-time), contractors, secondees or consultants or similar talent applying for a job or position with Unlimit (namely, you). Personal data in this Notice includes information that identifies or may identify you (e.g., your name, contact details, date of birth, professional experience etc.)
- 1.2. Unlimit is the Controller of your personal data processing under this Notice. Information about Unlimit and our contact details are available in paragraph 7 below and on our website www.Unlimit.com. This Notice does not form a contract of employment or otherwise.
- 1.3. We may change or amend this Notice at our discretion.
- 1.4. This Notice does not cover any instances of the processing of personal data that is:
 - outside of recruitment activities, like the use of Unlimit's products or services;
 - the processing of employees' personal data of Unlimit because this is covered by other personal data and associated documentation of Unlimit which is communicated to them at and during their tenure with Unlimit.

2. Collection and Use of Personal Data

Sources of collection – How we collect data

- 2.1. For recruiting purposes, we collect personal data from the following sources:
 - **Directly from you** during the application process for the job or position through our website, e-mail, phone, in-person correspondence, or during interviews with Unlimit. This personal data may consist of information that is required in the application form (available on Unlimit website in the section on careers) E.g., first name, surname, e-mail, phone number, address, link to a business network profile (LinkedIn or similar profiles), information contained in your CV and Cover Letter, or any supplementary information you choose to provide to Unlimit.
 - **Personal Data provided by third parties** such as from recruitment agencies or partners, employment websites, job boards, career networks, previous employers or references collected and processed under strict confidentiality. We may collect such personal data about you, subject to applicable law, to assist us in the pre-approval phase of the recruitment process.
 - **Data available on publicly accessible sources and database such** as public profiles made available by you.
 - **By visiting our offices during the interview process:** Personal data may be collected at our offices or online during an interview. E.g. if you are interviewed at our office, our offices do have security CCTV cameras which may collect photos or videos of you during your visit/interview meeting to our offices.
 - **During online interviews/meetings:** We may use an AI note-taking tool to assist with creating interview notes, summaries and transcripts for efficiency, to help improve the candidate experience, and to support the accuracy and completeness of information recorded. This may involve recording the audio of the interview/meeting for transcription and note-taking purposes. This enables our recruiters and interviewers to focus on the conversation rather than manual note-taking. You will be informed at the start of the meeting. You may opt out at the beginning and at any time during the meeting by removing the AI note-taker bot from the meeting, or by asking the recruiter/interviewer to remove or disable the AI note-taking tool.

Categories of Personal Data - what we collect/process

- 2.2. During your application process, we may collect and process the following categories and types of Personal Data:

<i>Your individual personal information</i>	First name, surname, communication language, location
<i>Your personal contact details</i>	Country of residence, e-mail address, phone number
<i>Your Identity information</i>	date of birth, gender, passport /national ID Card data, photo
<i>Your Employment and professional experience information</i>	Employment field, employment history, employer's details, professional experience
<i>Interview/meeting recordings and AI-</i>	Audio recordings of interviews/meetings, and related transcripts, notes and summaries.

generated outputs
(where used)

<i>Your Educational Information, language knowledge</i>	Level of education, qualifications, certifications; professional language/s knowledge
<i>Your place of Residence, work permit and travel-related information</i>	residence and immigration status, work permit, travel documents information
<i>Applicable Tax related information</i>	tax residence, social insurance and tax number
<i>Your Consents</i>	Any personal data that is contained in a consent form – online or by notice and subject to applicable laws.
<i>Special Categories of Personal Data (Where applicable)</i>	<p>E.g. Data concerning your health, disability status, trade union membership*</p> <p>Clean criminal record certificate (as required by law for employment/engagement-related purposes and/or for the purposes of employment/engagement by Unlimit in line with regulatory requirements related to our industry)</p> <p><i>*You are not required to submit any personal data in relation to the special categories of personal data; this type of data is subject to additional protection, and we may process it only if such personal data have been provided by you on your own initiative; in this case, we will consider the personal data is submitted for our processing based on your explicit consent.</i></p>

And any other personal data may be provided by you during the recruitment process, which is not included in the above list. Examples can include your hobbies or similar activities, but such personal data is not required for recruitment purposes.

Purposes and details of your Personal Data processing

- 2.3. Unlimit will process your personal data to process your application for a job position or role that you have applied for the following purposes:
- to identify and communicate with you
 - to assess your skills for the vacancy
 - to assess if you are suitable for the vacancy
 - to create accurate interview notes, summaries and/or transcripts using an AI note-taking tool to support an efficient recruitment process and allow interviewers to focus on candidates (subject to your opt-out choice). Please note that AI note taking tool is used only to support documentation of interviews/meetings. It does not make hiring decisions or determine outcomes; all hiring decisions are made with human review and oversight.
 - to comply with a legal obligation arising from the interaction between you and us
 - to file or defend legal claims (if applicable)
 - to comply with legal obligations and regulatory requirements
- 2.4. A failure to provide mandatory personal data may result in Unlimit being unable to consider your application.
- 2.5. Where you give contact details of referrers (e.g., previous employers, other professional contacts) during the application process, you agree that Unlimit can contact those referrers to get their feedback and other professional-related information about you. You also confirm that referrers are informed and have given you their consent to share their contact information. You are responsible for obtaining the permission of your referrals to be contacted by Unlimit.
- 2.6. If you have published or shared any information publicly, such as LinkedIn, Twitter or a public database/jobs portal, or even your own portfolios, this information is publicly available. You agree that Unlimit may view such databases or networks in the recruitment process. However, Unlimit usually may check only the publicly available information which is directly relevant to the job/position you are applying for.
- 2.7. Unlimit is not responsible for personal data processing practices of the third parties, including any social media networks, third-party databases and job portals. It would be best if you referred to such third parties' privacy policies and practices.
- 2.8. With your consent, Unlimit may retain your personal data and contact you for other current vacancies or future open vacancies or job positions within Unlimit Group and its affiliated entities. We keep your personal data for a period of up to one year for this. WE ask you to submit your personal data again by applying for a job or opportunity again after one year.

Legal bases – Lawful reasons for processing

- 2.9. When we process your personal data, we will rely on one of the legal processing bases below. We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data.

- 2.9.1. **Preliminary steps before entering into a contract:** to contact you and manage the recruitment process, to schedule and organize interviews, to assess the appropriateness and decide whether Unlimit will offer an employment / contractual opportunity and to take steps to enter into a contract with you.
- 2.9.2. **Because of a legal obligation:** processing of personal data for compliance with a legal or regulatory obligation that Unlimit is subject to, such as regulatory approvals for a position / senior position or cooperation with a public body/ies. We must perform such actions to carry out our legal and regulatory requirements because Unlimit operates in a regulated environment , being subject to laws and regulations associated with financial and payment services and industry. As such we may carry out background checks (including requesting a clean criminal record and bankruptcy status).
- 2.9.3. **As a legitimate interest:** in limited cases, we may process your personal data because it is necessary for us to do so to defend, prosecute or make a claim in a court of law or with another competent authority. We may also process your personal data for legitimate interests, in particular in the context of protecting our infrastructure, our offices or our staff. It also includes, where used during interviews/meetings, recording interview/meeting audio and generating transcripts, notes and summaries using an AI note-taking tool for the legitimate interests of conducting an efficient recruitment process, improving the candidate experience, and supporting the accuracy and completeness of interview documentation. We will put in place appropriate privacy safeguards to ensure, your rights and freedoms are respected. Where we rely on legitimate interests, you may object to this processing; you can also opt out of the AI note-taking tool at the beginning of the meeting or at any time during the meeting by removing the AI note-taker bot from the meeting, or by asking the recruiter/interviewer to remove or disable the AI note-taking tool.
- 2.9.4. **Your consent:** We will ask for specific permission to process your personal data for future vacancies within Unlimit group and/or its affiliated entities, or in other cases indicated in this Notice for prospective recruitment. You may withdraw your consent at any time, by contacting us using the contact details provided below. The revocation of your consent will not affect the legality of the data processed before the revocation.

3. Retention period

- 3.1. Unlimit will keep your personal data for as long as necessary to fulfill the purposes described in this Notice or as long as Unlimit is required to do so by law or in order to comply with a regulatory obligation or legitimate interest of Unlimit.
- 3.2. AI note-taker data (audio, transcripts, notes, summaries): Where used during interviews/meetings, any audio recordings and any transcripts, notes and/or summaries generated using the AI note-taking tool will be deleted immediately after a hiring decision has been made, unless a longer retention period is required by applicable law or is necessary to establish, exercise, or defend legal claims.
- 3.3. Your application (and accompanied personal data) will be retained for as long as it is necessary for the evaluation of your application and your recruitment for the relevant position or its rejection. In case of rejection, we will further hold your personal data for a period of up to one (1) year from submission for up to period of one year. We retain your personal data for that period primarily for the purpose of reaching out to you for other vacancies or job opportunities and claims treatment (if any) and similar procedures or auditing conducted on our operations (for example to show that the recruitment process is conducted fairly and transparently).
- 3.4. The retention period may be extended in case of other lawful reasons justifying longer retention (such as for disputes handling, legal proceedings, investigations purposes, legal/regulatory requirements).

4. Who receives your Personal Data

- 4.1. Your personal data may be processed locally in the EEA/local country of our operation or in another country where our partners or we operate worldwide, as permitted by law. Unlimit safeguards that access to personal data is granted only to role-based authorised personnel and on a need-to-know basis. During the process, information is shared internally within Unlimit with the relevant hiring manager(s), and executive personnel and may be shared with such relevant personnel as legal, IT and data protection function staff.
- 4.2. Unlimit may share information within Unlimit Group and its affiliated entities as described in this Notice. Your Personal Data may be processed either by the Unlimit company involved in your recruitment, or in any jurisdiction where we operate, or our third-party service providers operates.
- 4.3. If third parties or processors process your personal data on our behalf for the purposes described in this Notice, we aim to take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Notice.
- 4.4. Unlimit uses a specialized HR management system and software for efficient assessment and recruitment processes. Such processors and service providers are carefully selected and required to provide sufficient assurances under applicable data protection law (including, being bound contractually to confidentiality, security and data protection obligations).
- 4.5. Your personal data may be transferred from the European Union/European Economic Area (EU/EEA) or from another country that restricts transfers of personal information to third countries or to international organisations if the transfer is necessary within for the processing purposes as described in this Notice and subject to compliance with the requirements of applicable data protection law. Where such data transfer take place, we ensure that appropriate safeguards are in place for that transfer and storage as required by applicable data protection law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA. These safeguards will include imposing contractual obligations on the recipient of your personal data or ensuring that the recipients are subscribed to international frameworks that seek to ensure adequate protection, including, but not limited to, by concluding Standard Contractual Clauses adopted by European Commission.
- 4.6. Unlimit may disclose your personal data to pursue its legal obligations, legitimate interests, or where it is required under applicable law, e.g., in the context of audits, or to legal and other advisors. Unlimit may also share your personal data if Unlimit is under a duty to disclose personal data to comply with any legal or regulatory obligation.

5. Your Rights as the data subject

Data Subject Rights

5.1. Certain rights are afforded to you as the data subject under applicable data protection law. Please note that your rights are not absolute and may be limited due to a legal basis relied upon by us to process your personal data. To exercise your rights, please contact us via contact details provided below in this Notice.

Under EU Regulation 2016/679 (General Data Protection Regulation) you are afforded with the following rights:

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| 6.2.1. | Subject access | You can request a copy of the personal data retained and a confirmation from us whether personal data is processed or not. |
| 6.2.2. | Request correction of incorrect personal data | You can request a correction of incorrect or incomplete personal data kept by us. |
| 6.2.3. | Request the restriction of processing of your personal data | You may request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, e.g., if you want us to establish its accuracy or the reason for processing it. |
| 6.2.4. | Object to the processing of personal data | 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 can object to the processing of Personal Data by us. However, we may continue processing if we demonstrate that we have compelling legal grounds for processing which override your rights or that processing is necessary to establish, exercise or defend a legal claim, or for compliance with legal obligations. |
| 6.2.5. | Withdrawal of consent | Where Your Personal Data processing is based on your consent, you have the right to withdraw this consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. |
| 6.2.6. | Right to erasure | You can request erasure of your Personal Data (depending on the circumstances in place) where: <ul style="list-style-type: none">- Processing is no longer required for the reasons the data was collected or processed- We are relying on consent as a legal basis, and you withdraw your consent- You have objected to the processing of data- The data has been unlawfully processed- Required by law |

We may continue to retain your data if another legitimate reason for doing so exists, superseding any right to erasure request.

Exercising your rights and right to raise a complaint

- 5.2. To exercise your data subject rights, or if you have any questions about this Notice, please send an e-mail to our data protection office at dpo@Unlimit.com.
- 5.3. If you are based in the European Union, you may also submit a complaint to the Commissioner for Personal Data Protection. Information on filing is available on the [Commissioner's website](#).

6. This Notice and Changes to this Notice

- 6.1. The most recent version of this Notice will be available on our website www.Unlimit.com.
- 6.2. Unlimit may revise or update this Notice from time to time. In such a case, we make the most recent version of the Notice available on our website www.Unlimit.com, informing you accordingly by displaying in the updated version and relevant date of update.

7. How to contact us

7.1. The Controller of your personal data processing is Unlimit EU Limited, Cyprus, with the contact details as below:

Unlimit Head Office
Address: 125, Georgiou Griva Digeni, Limassol, 3101, Cyprus
Tel.: +35725388600
The Unlimit Group's supervisory authority is the Commissioner for Personal Data Protection in Cyprus.

7.2. For questions related to data protection, please get in touch with our Data Protection Officer directly as follows:

Data Protection Office
Unlimit
125 Georgiou Griva Digeni, Limassol, 3101, Cyprus
E-mail: dpo@Unlimit.com