

Scalapay S.L. – Privacy Notice

Scalapay S.L., a single-member company, with its registered office in Barcelona, Spain, at Calle Muntaner, 305 P. Pr Pta. 2, 08021, n. NIF B67934109, (hereinafter also “**Scalapay**”), in its capacity as data controller, respects privacy and is committed to protecting the personal data of candidates applying for job positions at Scalapay or at other companies within the Scalapay group (hereinafter, the “**Group**”).

This privacy notice (hereinafter, “**Notice**”) shows the purposes, and the method of collection, management and protection of candidates’ personal data.

Scalapay undertakes to process your personal data in accordance with the General Data Protection Regulation (UE Regulation 2016/679), commonly known as “**GDPR**”, the Spanish Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (“**LOPDGDD**”), as well as any other applicable data protection legislation. In particular, the processing carried out by Scalapay will be based on the principles of lawfulness, fairness, transparency, purpose limitation, storage limitation, data minimization, accuracy, integrity and confidentiality.

1. PRIVACY NOTICE PURPOSE

This privacy Notice is provided pursuant to Article 13 of the GDPR and is intended to inform you about how Scalapay processes your personal data collected through your use of the “Careers” section of our website and/or through third-party recruitment and selection platforms (such as, by way of example, LinkedIn o LinkedInRecruiter), including any data you may provide as part of your application for a Scalapay job position.

It is important that you read this Notice, together with any other privacy notice we may provide from time to time in order to supplement, update or further explain how we collect and process your personal data. We will seek to coordinate these notices so as to ensure that, at any given time, they clearly and transparently reflect the conditions applicable to the processing of your personal data and remain easily accessible.

2. DATA CONTROLLER

Scalapay acts as data controller, and it is responsible for your personal data.

We have appointed a Data Protection Officer (the “**Data Protection Officer**” or “**DPO**”), who may be contacted by data subjects for any queries relating to the processing of personal data carried out by the data controller, at the following address: dpo@scalapay.com.

0. WHAT PERSONAL DATA DO WE COLLECT?

This section describes the categories of personal data that we process. Section 4 will explain the purposes for which we process these categories of personal data.

We collect your personal data when you use our website and/or when you submit your application for job positions published by the Group on third-party recruitment platforms (such as, by way of example, LinkedIn or LinkedInRecruiter).

If you visit our website or download our app, your browser automatically transmits certain data, such as the date and time you accessed our web pages, the type and settings of your browser, your operating system and your IP address. For further details relating to the processing of personal data collected through our website, we invite you to refer to the cookie policy available on the website www.scalapay.com/cookies.

On third-party recruitment platforms (such as, LinkedIn or LinkedInRecruiter) Scalapay collects the personal data you include in your *curriculum vitae* and/or in any other document requested for the submission of your application.

Through your website and through the collection of applications, we process the following personal data regarding the following categories of data subjects:

Data of candidates for job positions	
Name and Surname	
Date of birth	
Place of birth	
Residence	
E-mail address	
Phone number	
Educational certifications	

Professional certifications
Previous work experience
Any other data voluntarily provided when submitting the <i>curriculum vitae</i>

Scalapay will not require you to provide any special category data (such as data related to your health, religious beliefs or political opinions). Should you nonetheless decide to voluntarily include this category of personal data, Scalapay will limit the processing strictly to the purposes indicated in Section 4 below. At this stage of the recruitment and selection process, Scalapay only needs to collect data relating to any potential status as a protected category, without further details; therefore, we invite you not to include any special category data in your *curriculum vitae*.

0. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

We limit the collection of your personal data to the amount and type strictly necessary for the purposes for which they are processed, as described in the table below.

We restrict, protect and monitor our IT resources to prevent unauthorized access, damage, loss or destruction, whether physical or electronic. We retain your personal data only for the period described below, which is necessary to respond to your requests or otherwise required by law. Where your personal data are retained for historical or statistical purposes, we adopt appropriate measures to ensure anonymization or the impossibility of any further use of your personal data for new purposes.

To facilitate your understanding of the purposes, legal basis and the conditions under which we process your personal data, the table below sets out the categories of data processes, the purposes of the processing, the "legal basis" authorizing each processing activity and conferring lawfulness, as well as the applicable retention period:

Categories of data	Purpose of processing	Legal Basis	Retention period
<ul style="list-style-type: none"> - Data relating to educational qualifications and previous professional experience - Other data voluntarily provided when submitting the <i>curriculum vitae</i> 	<ul style="list-style-type: none"> - Assessment of your profile, aptitudes and professional skills - Recruitment and selection of personnel 	Art. 6, sec. 1, letter b) GDPR: performance of a contract to which the data subject is a party or the taking of pre-contractual measures at the data subject's request	In light of the complexity of the selection process, up to a maximum of 12 months from the submission of the <i>curriculum vitae</i>
Identification and contact data	Planning and management of the recruitment and selection process	Art. 6, sec. 1, letter b) GDPR: performance of a contract to which the data subject is a party or the taking of pre-contractual measures at the data subject's request	In light of the complexity of the selection process, up to a maximum of 12 months from the submission of the <i>curriculum vitae</i>

The processing of personal data for the purposes described in the table above is necessary for the performance of pre-contractual measures taken at your request pursuant to Article 6, section 1, letter b) of the GDPR within the context of

the recruitment and selection process. Where applicable, such processing may also be based on Scalapay's legitimate interest in managing and organizing its recruitment processes, pursuant to Article 6, section 1, letter f) of the GDPR.

If you voluntarily decide to include special category data in your *curriculum vitae* (such as any possible status as a protected category), the processing of such data will be limited to recruitment purposes and will be lawful pursuant to Article 9, section 2, letter e) of the GDPR.

Scalapay also informs you that, for the purposes described above, your personal data will be processed using IT, telematic and manual tools, in compliance with applicable confidentiality and security rules.

1. WHAT HAPPENS IF YOU DO NOT PROVIDE YOUR PERSONAL DATA?

Providing your personal data is optional and voluntary. However, failure to provide such data will make it impossible for you to submit your application and to be considered in the relevant selection process.

2. INTERNATIONAL TRANSFERS

Some of the third-party providers we rely on are located outside the European Economic Area ("EEA"), which means that processing your personal data may involve a transfer of data outside the EEA. Whenever we transfer your personal data outside the EEA, we ensure that a level of protection equivalent to that within the European Union is guaranteed by implementing at least one of the following safeguards:

- Adequacy decisions: where the transfer of personal data is made to countries deemed by the European Commission to provide an adequate level of data protection;
- Standard Contractual Clauses: where no adequacy decision exists, we use specific contractual clauses approved by the European Commission to ensure the same level of data protection as that required within the EU.

3. WHO MAY WE SHARE YOUR PERSONAL DATA WITH?

Within Scalapay' organization, candidates' personal data may be processed by personnel tasked with carrying out specific processing activities.

Beyond this, we may share your personal data with the categories of recipients and for the purposes listed below, in compliance with the principles of data minimization and purpose limitation and by implementing appropriate security measures. In particular:

- We may share your personal data with other companies within the Scalapay Group for purposes related to managing the recruitment process, evaluating your professional profile and, where necessary, considering your placement within one of the Group companies. These companies will process your data as independent data controllers or, where applicable, as data processors, always in compliance with applicable law and solely for the purposes indicated here.
- We may share your personal data with service providers and subcontractors engaged in recruitment and selection purposes. These include authorized entities such as software providers, data storage providers, headhunters and recruitment platforms. They may process personal data solely to the extent necessary to perform their assigned tasks and in compliance with applicable law.

Scalapay undertakes to adopt the necessary contractual, legal, technical and organizational measures to ensure an adequate level of protection for your personal data.

4. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your personal data only for as long as necessary to fulfil the purposes for which they were collected, including any legal, accounting or reporting obligations. In determining the appropriate retention period, we consider various factors, such as the amount, nature and sensitivity of the personal data; the potential risk of harm from unauthorized use or disclosure; the purposes for which the data are processed and whether those purposes can be achieved through other means.

More information on specific retention periods can be found in the table in Section 4.

5. HOW DO WE PROTECT YOUR PERSONAL DATA?

We apply appropriate technical and organizational measures to ensure the security of your personal data. In particular, we limit the collection of data to what is strictly necessary for the purposes indicated and for the time needed to achieve

them. We also protect and monitor all our information resources to prevent accidental or unlawful access, damage, loss or destruction, whether in physical or electronic form.

6. YOUR RIGHTS

You may exercise your rights in relation to your personal data as recognized under data protection law. Below is a summary of these rights:

10.1. Right to be informed

The GDPR recognizes the right of individuals to be informed about the collection and use of their personal data as a fundamental transparency requirement in the processing of personal data. This Notice and our cookie policy satisfy this requirement.

10.2. Right to access to personal data

Also known as a “data subject access request”, this right allows you to obtain a copy of your personal data held by the data controller and to verify that the data is being processed lawfully.

10.3. Right to rectification of personal data

This right allows you to request the correction of incomplete or inaccurate personal data held by Scalapay. Following your request, we may need to verify the accuracy of the new data provided.

10.4. Right to erasure of personal data

This right enables you to request the deletion of your personal data where there is no valid reason for us to continue processing them.

You may obtain erasure of your personal data in the cases provided under Article 17 of the GDPR. However, please note that in some circumstances we may not be able to comply with your request for legal reasons (for example, where the processing and retention of the data are necessary to comply with a legal obligation or to establish, exercise or defend a legal claim), which will be communicated to you at the time of your request.

10.5. Right to object to the processing of personal data

Under the conditions set out in Article 21 of the GDPR, you may object to the processing of your personal data if you believe that such processing affects your fundamental rights and freedoms, and where the processing is based on legitimate interest (Art. 6, section 1, letter f) GDPR) by us or a third party.

Additionally, you may object where your personal data is used for direct marketing purposes.

10.6. Right to request restriction of processing of personal data

You may request the suspension of the processing of your personal data where one of the conditions expressly provided for under Article 18 of the GDPR applies. In particular, you may request the restriction of processing where you contest the accuracy of the data, object to the processing, or request that your data be retained solely for the purpose of establishing or defending a legal claim.

10.7. Right to data portability

You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, and to request that such data be transmitted to you or to another data controller, under the conditions set out in Article 20 of the GDPR.

This right applies only to data processed by automated means and based on your consent or on a contract to which you are a party.

10.8. Right to lodge a complaint with a supervisory authority

We remind you that you always have the right to lodge a complaint with the competent supervisory authority for the protection of personal data. In Spain, the competent supervisory authority is the Spanish Data Protection Authority (Agencia Española de Protección de Datos – AEPD), with registered office at Calle Jorge Juan, 6, 28001 Madrid, or by email at the following address: aepd@aepd.es.

7. CONTACT DETAILS

To exercise your rights or to request information about how we process your personal data, you can contact us by email at the following address: dpo@scalapay.com.