

Privacy Notice For European Job Applicants
Date: April 15, 2024

This European job applicant privacy notice (“Notice”) is being provided to all residents of the European Economic Area and the United Kingdom who submit information relating to an actual or potential application for employment (“you”) with the below employers:

Further Worldwide, LLC

The employers listed above (referred to as “us,” “we” or “our”) collect and use personal information about you in an employment context as described in this Notice.

Please review this Notice carefully to understand our practices and treatment regarding your personal information. We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with all applicable laws. This Notice is designed to help you understand the categories of information about you that we collect, the purposes for which those categories of information will be used and to whom your personal information is disclosed. If you have any questions, regarding our collection or processing of your information, or have any comments or questions about this Notice, please reach out through the mechanisms found in section titled [Contact Us](#).

Our Notice includes:

1. [Collection And Use Of Personal Information](#)
2. [Obtaining Consent](#)
3. [Third-Parties](#)
4. [Limitations](#)
5. [Retention Of Personal Information](#)
6. [Where Your Personal Information Is Being Stored Or Processed](#)
7. [Access And Rights To Your Personal information](#)
8. [How To Submit A Request](#)
9. [How We Process Data Rights Requests](#)
10. [Response Time](#)
11. [Costs](#)
12. [Accuracy](#)
13. [Safeguards](#)
14. [Changes To This Privacy Notice](#)
15. [Contact Us](#)

1. COLLECTION AND USE OF PERSONAL INFORMATION

During the application process, we will collect and/or process personal information about you. We will also disclose your personal information to third parties for the purposes of facilitating the evaluating and processing your application, as described below. Whenever we permit another entity to access your personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of your information is maintained.

Categories Collected The personal information we collect may include:	Sources of Collection We may collect your personal information from:	Business Purpose of Collection The purposes of collection include:	Categories of Third Parties to Whom Personal Information is Disclosed We may disclose your personal information:	Legal Basis for Processing We process your personal information based upon:
Identifier Information:*	<ul style="list-style-type: none"> ● you directly ● our background check providers ● our headhunting or employee search providers ● publicly available databases ● your former employers or references 	<ul style="list-style-type: none"> ● assess your suitability for employment for the role for which you are applying, as well as future roles that may become available ● perform recruitment related administrative functions ● to perform background checks on you ● to communicate with you in regards to your application ● as required by law ● to defend claims brought against us, to investigate violations of law or breaches of our own internal policies 	<ul style="list-style-type: none"> ● to our subsidiaries and affiliates ● to our service providers** ● to individuals or entities you authorize ● our background check providers ● as required for legal purposes ● to entities that acquire all or part of our business in a corporate transactions ● to your former employers or references 	<ul style="list-style-type: none"> ● your consent in providing this information for processing consistent with this Notice in order to process your application for employment ● our need to comply with a legal or regulatory obligation ● our legitimate interest in effectively evaluating candidates for open positions
<p>*For example, we may collect your full name, personal e-mail address, personal phone number, signature, sex, gender, date of birth/age, postal address, location and preferred language.</p>				
<p>**For example, your personal information may be made available to our human resource platform provider, recruiting vendors, background check provider, e-mail and SMS texting platform provider or auditors.</p>				
Background Check Information:†	<ul style="list-style-type: none"> ● you directly ● our background check providers ● publicly available databases 	<ul style="list-style-type: none"> ● assess your suitability for employment for the role for which you are applying, as well as future roles that may become available ● perform recruitment related administrative functions 	<ul style="list-style-type: none"> ● to our subsidiaries and affiliates ● to our service providers†† ● to individuals or entities you authorize ● as required for legal purposes 	<ul style="list-style-type: none"> ● your consent in providing this information for processing consistent with this Notice in order to process your application for employment ● our need to comply with a legal or regulatory obligation

		<ul style="list-style-type: none"> ● to perform background checks on you ● as required by law ● to defend claims brought against us, to investigate violations of law or breaches of our own internal policies 		<ul style="list-style-type: none"> ● our legitimate interest in effectively evaluating candidates for open positions
<p>†For example, we may collect your educational and employment background, history, arrest records, conviction records, credit information, disciplinary actions and news articles about you.</p> <p>†† For example, your personal information may be made available to our human resource platform provider, recruiting vendors, background check provider or our auditors.</p>				
Professional or Employment-Related Information: [†]	<ul style="list-style-type: none"> ● you directly ● our headhunting or employee search providers ● our background check providers ● publicly available databases ● your former employers or references 	<ul style="list-style-type: none"> ● assess your suitability for employment for the role for which you are applying, as well as future roles that may become available ● perform recruitment related administrative functions ● to perform background checks on you ● as required by law ● to defend claims brought against us, to investigate violations of law or breaches of our own internal policies 	<ul style="list-style-type: none"> ● to our subsidiaries and affiliates ● to our service providers** ● to individuals or entities you authorize ● as required for legal purposes ● to entities that acquire all or part of our business in a corporate transactions 	<ul style="list-style-type: none"> ● your consent in providing this information for processing consistent with this Notice in order to process your application for employment ● our need to comply with a legal or regulatory obligation ● our legitimate interest in effectively evaluating candidates for open positions
<p>†For example, we may collect your resume, date of employment, employment history, pay or salary, standard hours, bonus, termination details, business unit and location, disciplinary actions, work authorization status, employee accomplishments, assessments, reviews, and disability, military or veteran status.</p> <p>††For example, your personal information may be made available to human resource platform provider, recruiting vendors, background check provider or our auditors.</p>				
Education Information: ^{**}	<ul style="list-style-type: none"> ● you directly ● our background check providers 	<ul style="list-style-type: none"> ● assess your suitability for employment for the role for which you are applying, as 	<ul style="list-style-type: none"> ● to our subsidiaries and affiliates ● to our service providers*** 	<ul style="list-style-type: none"> ● your consent in providing this information for processing consistent with this Notice in order to

	<ul style="list-style-type: none"> • our headhunting or employee search providers • publicly available databases 	<ul style="list-style-type: none"> • well as future roles that may become available • perform recruitment related administrative functions • to perform background checks on you • as required by law • to defend claims brought against us, to investigate violations of law or breaches of our own internal policies 	<ul style="list-style-type: none"> • to individuals or entities you authorize • as required for legal purposes • to entities that acquire all or part of our business in a corporate transactions 	<ul style="list-style-type: none"> • process your application for employment • our need to comply with a legal or regulatory obligation • our legitimate interest in effectively evaluating candidates for open positions
<p>*For example, we may collect your resume, curriculum vitae, transcripts, educational background, educational records and participation in ongoing education and training courses.</p> <p>**For example, your personal information may be made available to our human resource platform provider, our employee data hosting vendor, our employee intranet platform provider, our employee background check provider or our auditors.</p>				
Inferences: *	<ul style="list-style-type: none"> • you directly • our headhunting or employee search providers • our interviewer or recruiting professional • your former employers or references 	<ul style="list-style-type: none"> • assess your suitability for employment for the role for which you are applying, as well as future roles that may become available • perform recruitment related administrative functions 	<ul style="list-style-type: none"> • to our subsidiaries and affiliates • to our service providers** • to individuals or entities you authorize • as required for legal purposes • to entities that acquire all or part of our business in a corporate transactions 	<ul style="list-style-type: none"> • your consent in providing this information for processing consistent with this Notice in order to process your application for employment • our legitimate interest in effectively evaluating candidates for open positions
<p>** For example, we may collect your behavioral information, attitude information or abilities and/or preferences.</p> <p>*** For example, your personal information may be made available to our human resource platform provider, recruiting vendors, background check provider or auditors.</p>				
Sensitive Personal Information (identity information) †	<ul style="list-style-type: none"> • you directly 	<ul style="list-style-type: none"> • perform recruitment related administrative functions • to perform background checks on you • as required by law • to defend claims brought against us, to investigate 	<ul style="list-style-type: none"> • to our subsidiaries and affiliates • to our service providers‡ • to individuals or entities you authorize • as required for legal purposes 	<ul style="list-style-type: none"> • your consent in providing this information for processing consistent with this Notice in order to process your application for employment

		violations of law or breaches of our own internal policies	<ul style="list-style-type: none"> • to entities that acquire all or part of our business in a corporate transactions 	<ul style="list-style-type: none"> • our need to comply with a legal or regulatory obligation • our legitimate interest in effectively evaluating candidates for open positions
<p>[†]For example, we may collect your Social Security number, driver’s license number, state identification card and number, nationality, place of birth and racial or ethnic origin.</p> <p>[#] For example, your personal information may be made available to our human resource platform provider, employee data hosting vendor, employee intranet platform provider, employee background check provider or auditors.</p>				

2. OBTAINING CONSENT

Except when otherwise permitted by law or binding regulation, we will obtain the requisite consent from you prior to collecting and, in any case, prior to using or disclosing your personal information for any purpose other than as disclosed in this Notice. You may provide your consent to us orally, in writing, by electronic communication, through your actions or any other means reasonably capable of conveying your consent. However, your refusal to provide consent for collection (or your withdrawal of previously given consent) or to give your personal information when requested, can interfere with our ability to effectively evaluate your application for employment and may to the rejection of your application.

3. THIRD PARTIES

We remain responsible for all personal information communicated to other entities for processing on our behalf. As such, we ensure that other entities that are engaged to provide products or services on our behalf and who are provided with personal information are required to observe the intent of this Notice by having comparable levels of security protection or, when required, by assuring us (through a confidentiality agreement) that they will not use or disclose the personal information for any purpose other than the purpose for which the personal information was communicated. You can find specific details about to whom we discloses your personal information in the section titled [Collection And Use Of Personal Information](#).

4. LIMITATIONS

We only collect the personal information necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal information except for the purposes for which it was collected, new purposes to which you have consented, or as required or otherwise permitted by applicable law. We do not as a condition of your application for employment, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal information beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law or regulation.

5. RETENTION OF PERSONAL INFORMATION

We generally retain your information as long as reasonably necessary to administer the evaluation of your application for employment, comply with applicable law or our document retention policy. This means that we may retain your personal information even if we reject your employment application. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means and the applicable legal requirements.

6. WHERE YOUR PERSONAL INFORMATION IS BEING STORED OR PROCESSED

Your personal information is being stored or processed in the European Union, United States, United Kingdom where our administrative and data centers are located. If you are a resident of the European Union, please note that the United Kingdom has been recognized by the European Commission as providing an adequate level of privacy protection to data subjects. Similarly, the European Union has been recognized by the UK as providing an adequate level of privacy protection to data subjects. However, United States's adequacy determination is still being resolved by both the UK and EU. Therefore, the United States may not have privacy laws that are as strong or comprehensive as the privacy laws in your own country.

Your personal information may also be stored in a multi-tenant cloud environment hosted by our service providers.

7. ACCESS AND RIGHTS TO YOUR PERSONAL INFORMATION

Depending on your country of residence, you may have data rights as provided by various laws, regulations and codes, which can include the European Union's General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. An interactive map showing the various privacy and protection laws around the world can be found [here](#).

Subject to the exceptions provided by applicable law or regulation, and depending on your country of residence, you may have the following rights regarding your personal information:

- if we process your personal information based on your consent, you have the right to withdraw your consent at any time for further processing;
- you have the right to request access to, rectification or deletion of your personal information;
- you have the right to object to the processing of your personal information;
- you have the right to request us to transfer your personal information to another controller; and
- you have the right to request us to restrict the processing of your personal information.

Finally, you have the right to raise a complaint with us or the appropriate data protection authority of your country of residence if you feel that our processing of your personal information violates your individual rights, is not in line with this Notice or violates the privacy principals, laws or regulations of your country of residence.

- You can contact our privacy officer by using the information provided under [Contact Us](#). We will promptly investigate any complaint and will respond within the timeframes describe in this Notice.
- If you are a resident of the European Union, you can find your appropriate data protection authority by following this [link](#).
- If you are a resident of the United Kingdom, you can contact your data protection authority through the information provided in this [link](#).

8. HOW TO SUBMIT A REQUEST

You can submit your request to exercise a data right through:

- **Filling-out** the Data Subject Request form ([linked here](#))
- **Calling** us toll-free at 1-(844)-441-9869 PIN: 243012
- **E-mailing** us directly at dataprivacy@gofurther.com

Please be as specific as possible in your request so that we can meet the applicable handling timelines. Where we are the data controller with regards to the personal information that we process, you may exercise your rights as a data subject directly with us. Where we are collecting your personal information on behalf of another entity (i.e., we are not the data controller), we will provide you with the identity of the data controller to the extent we are required to do so by law.

9. HOW WE PROCESS DATA RIGHTS REQUESTS

Not all individuals about whom we possess information will have access to these rights and we may not be able to provide these rights to everyone due to legal and jurisdictional limitations. We may not be able to comply with your request for a number of reasons, including:

- you do not live in a jurisdiction that grants you the specific right that you have requested;
- the information that you've requested is not subject to the regulation that grants you the right to make a request in relation to your personal information;
- we are prevented by law, regulation or rule from complying with your request;
- we are not able to comply with your request without incurring disproportionate burden or expense; or
- if complying with your request conflicts with our ability to administer your employment or to establish, defend or administer legal claims.

If any of the above reasons apply, we will let you know in our response to your request. Note that we may be required to gather additional information from you in order to process your request. We will only use this information in the context of evaluating and responding to your request. If you fail or refuse to provide the necessary information, we may not be able to process your request.

10. RESPONSE TIME

We will make every reasonable effort to respond to your written request not later than 30 days after receipt of such request. We will advise you in writing if we cannot meet your request within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority, as detailed in this Notice, with respect to this time limit.

11. COSTS

We expect to be able to respond to your request without charge as a general matter. However, where allowed by law, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

12. ACCURACY

We will use reasonable efforts to ensure that your personal information is kept as accurate, complete and up to date as possible. We do not routinely update your personal information in our possession, unless such a process is necessary. In order to help us maintain and ensure that your personal information is accurate and up to date, you must inform us, without delay, of any change in the data that you have provided to us.

You can at any time, challenge the accuracy or completeness of the personal information we have about you, subject to the exceptions provided by applicable law. If you demonstrate that the personal information we have on you is inaccurate or incomplete, we will amend the personal information as required. Where appropriate, we will transmit the amended data to third parties to whom we have communicated your personal information.

13. SAFEGUARDS

We use security safeguards appropriate to the sensitivity of personal information to protect it from loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These safeguards include physical measures, such as restricted access to offices and equipment, organizational measures, such as security clearances and publishing this policy to appropriate personnel with instructions to act in

accordance with its principles (for example, limiting access on a “need to know” basis), and technological measures, such as the use of passwords and/or encryption.

14. CHANGES TO THIS PRIVACY NOTICE

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. You will be able to see when we last updated this Notice because we will include a revision date at the top. The latest version of this Notice is available on our [application portal](#).

15. CONTACT US

To submit questions or to inquire about or submit a request relating to data rights, you can contact us by:

- **Calling** us toll-free at 1-(844)-441-9869 PIN: 243012
- **E-mailing** us directly at dataprivacy@gofurther.com