

## Candidate Privacy Statement

Circles is committed to protecting the personal data of all job applicants in accordance with applicable national and international data protection laws. This policy outlines our comprehensive approach on how we collect, use, protect, and manage your personal data during the recruitment process.

### Scope of Application and Jurisdiction

This policy applies to all job applicants, candidates, internal applicants, referees, emergency contacts, and third-party agencies engaged in recruitment on behalf of Circles, across all entities and jurisdictions where Circles operates, with adherence to applicable local and international data protection requirements.

### How We Collect Candidate Data

We generally collect personal data that

- (a) you knowingly and voluntarily provide directly to us in the course of or in connection with your employment or job application with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”, which may include your job placement agent), after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or
- (b) collection and use of personal data without consent is permitted or required by applicable data protection laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

### What We Collect

The types of personal data that we may collect from you or your authorised representative as part of your job application includes, without limitation, the following:

- Name (including Given, Legal, Family, Former and alias), identification document(s), work authorisation, gender, date of birth, nationality, and country and city of birth
- Addresses (including residential, communication and permanent), telephone numbers, email address and other details as may be required such as social media profile (e.g. LinkedIn, publications)

- Resume, educational qualifications, professional qualifications and certifications and employment references
- Employment and training history
- Work-related health issues and disabilities
- Photographs
- Any additional information you voluntarily provide during the hiring process.

We will rely on the accuracy of the personal data provided by you (or your authorised representative).

## **Why We Collect It**

We collect and use your personal data to administer our recruitment activities including:

- Assessing and evaluating your suitability for employment in any current or prospective position within the organisation;
- Verifying your identity and the accuracy of your personal details and other information provided and conducting or obtaining reference and background checks;
- Taking further steps to enter into an employment contract with you, for example communicating offers of employment to you;
- Communicating with you to facilitate, manage and improve our recruiting and hiring processes.
- Fulfilling regulatory reporting obligations and ensuring compliance with employment laws, visa, and immigration requirements;
- Ensuring prevention of discrimination and promotion of equal opportunities;
- Supporting diversity, equity, and inclusion initiatives as part of our organisational commitments.

## **How We Use and Share It**

Your information may be shared internally with teams involved in the recruitment process and with trusted service providers such as for background verification or recruitment platforms (e.g., Greenhouse, Workday), strictly on a need-to-know basis.

We may share your personal information with other third parties, for example in the context of a possible sale or transfer of our business or assets to a third party, or to relevant third parties such as auditors, lawyers, insurers or professional advisors in accordance with applicable law. We may also need to disclose your personal information to comply with a subpoena, bankruptcy proceedings or similar legal process, or in response to lawful requests by public, regulatory or government authorities.

We may process your personal information outside of the jurisdiction in which it was collected for the purposes set out in this Policy, including within our Group globally and with service

providers outside that jurisdiction. Such third countries may not offer the same level of data protection as your jurisdiction. Where your personal information is transferred to a jurisdiction without adequate privacy laws, we have policies and procedures, have established safeguards to protect the personal information that is transferred in accordance with applicable data protection laws, including but not limited to: standard contractual clauses, binding corporate rules or other internal policies for transfers within our corporate group and privacy certification frameworks.

## **Retention of Data**

We will retain your personal data only as long as necessary for recruitment purposes in accordance with legal and compliance requirements. If you are not selected, we may retain your information for a limited time to consider you for future opportunities, unless you request otherwise.

If your application is successful, personal information processed during the recruitment process will be added to your employee record and processed in accordance with our Employee Personal Data and Privacy Policy.

## **Your Rights**

You have the right to request access to, correct, or delete your personal data, and/or withdraw consent at any time by writing to our Data Protection Officer at:

- [dpo@circles.co](mailto:dpo@circles.co)
- For Jetpac Roles: [dpo@jetpacglobal.com](mailto:dpo@jetpacglobal.com)

Upon receipt of your written request, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us.

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

Please note that withdrawing consent may affect our ability to process your application. Withdrawing consent also does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

We are committed to the secure and irreversible deletion of personal data that is no longer necessary for the purposes for which it was collected or otherwise processed. Such deletion shall be carried out through appropriate technical and organizational measures, including secure digital deletion employing overwriting protocols, physical destruction of paper records,

and obtaining certificates of destruction from authorized vendors. Additionally, we conduct regular audits to verify compliance with applicable data retention and deletion policies.

## **Security Measures**

We take data security seriously and have implemented appropriate technical and organizational measures to protect your personal data. While no method of storage or transmission is completely secure, we strive to safeguard your data to the best of our ability.

## **Children and Young Applicants**

We are committed to protecting the personal data of children and young people (under 18 years old) in compliance with applicable laws and best practices. While our recruitment processes are typically directed at adults, the Group welcomes and takes in interns as attache to gain work experience as part of their studies/graduation. If you are under 18, please read the following carefully before submitting your personal data:

If you are under the minimum age for consent in your jurisdiction, you must obtain verifiable consent from a parent or legal guardian before submitting any personal information to us.

We collect only the essential data needed for evaluating your candidacy and all personal data used in the recruitment process will be handled via enhanced security measures.

Any processing involving the personal data of young applicants is conducted in their best interests, ensuring fairness and transparency. We refrain from any profiling or automated decisions that could significantly affect the young applicant.

We retain personal data of young applicants only for so long as necessary for legitimate recruitment purposes. If consent is not properly obtained, or if the application is unsuccessful, the data will be securely deleted promptly, unless retention is legally required.