

## **Data Protection Policy**

Brickken Solutions S.L., a company based in Llacuna Street, number 162, module 302 (Barcelona), 08018, Spain with VAT number B67557603 (hereinafter referred to as the “**Company**”) is the Data Controller of your personal data ( “**You**”) and is committed to respecting your data, processing it with the utmost care, and providing the highest level of protection in accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, the “GDPR”) and applicable national legislation.

This data protection policy provides information about the personal data we collect and the purposes for which we process it, along with your rights and how you may exercise them. Please read the following carefully to understand our views and practices regarding your personal data and how we handle it. Any questions regarding the processing of your personal data can be sent to the following email address: [dpo@brickken.com](mailto:dpo@brickken.com)

### **1. Purpose of Processing and Legal Basis**

The Company collects and uses your personal data in the context of your application for a current or future job opening at the Company. The legal basis for processing your personal data in connection with an active job application is the performance of a pre-contractual measure (Article 6.1(b) of the GDPR). The legal basis for processing your personal data (storage) for the purpose of future vacancies is your consent (Article 6.1(a) of the GDPR). Certain information (e.g., visa status, work permits, etc.) is collected and processed to comply with a legal obligation

### **2. Personal Data Processed**

The Company processes the following personal data during a recruitment process:

- Personal identification data;
- Email address;
- Phone number;
- Demographic characteristics;
- Nationality and, if necessary, proof of identity, work permit, and residence document (mandatory inspection under foreign labor law);
- Curriculum vitae, cover letter, educational/professional qualifications and experience;
- Information shared in job interviews, CVs, or correspondence;
- Photographs;
- Psychological data;
- Salary Expectation;
- Hobbies and interests;
- Publicly accessible information about you on the Internet;

- References (only with your consent);
- Data from your visit to our website or our Recipients' websites (e.g., traffic data, location data, weblogs, etc.);
- Social media data (LinkedIn).

### 3. Recipients

The Company may grant subcontractors access to your personal data to process it on our behalf and in accordance with our instructions. Depending on your own circumstances, one or more of the following may be recipients of your data:

- **PayFit Recursos Humanos SL**, HR platform, Calle Pamplona, 104 Barcelona, 08019, Spain. VAT.B67154237
- **Google Cloud EMEA Limited**, cloud-based productivity and email services provider, Velasco, Clanwilliam Place, Dublin 2, Ireland. VAT IE3668997OH
- **Bigle Iberia SL**, Legal Documents Management. Ronda Sant Pere, 52 08010, Barcelona, Spain. VAT.B66387317

### 4. Automated Decision-Making/Profiling

Some of our service providers allow us to identify suitable candidates based on criteria we have explicitly defined, or which are typical for the position being applied for. The process of identifying suitable candidates is automated; however, any hiring decisions are made by our staff. This process is carried out based on legitimate interest in helping identify the candidates most likely to be hired. It does not assess an individual's key characteristics and is fully anonymous.

### 5. Security

The Company has adopted appropriate measures to ensure that all your personal data is stored securely, including safeguards to prevent accidental loss, unauthorized use, or access. We limit access to your personal data to those with a genuine business need to know. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

The Company also has procedures in place to handle any suspected data security breaches. We will notify You and any applicable regulator of a suspected data breach where we are legally required to do so.

### 6. Retention Period

If your application is successful, all the information obtained about you during the recruitment process will be included in your employee file. If your application is not successful, we will not retain your personal data for longer than 5 years, unless, after this period has elapsed, you provide your renewed consent in accordance with Articles 6(1)(a) and 7, which establish, respectively, the lawfulness of processing based on the data subject's consent and the conditions under which such consent is considered valid.

### 7. Your Rights

Under the GDPR, You have certain rights concerning the processing of your personal data:

- **Right to be informed:** You have the right to receive clear, transparent, and easily understandable information about how we use your personal data and your rights.
- **Right of access:** You have the right to access your personal data.
- **Right to rectification:** You have the right to have your personal data corrected if it is inaccurate or incomplete.
- **Right to erasure:** You can request deletion of your personal data when there is no compelling reason for us to continue processing it. This is not an absolute right and exceptions apply.
- **Right to restrict processing:** You have the right to “block” or suppress further use of your personal data. When processing is restricted, we may still store your personal data but may not use it further.
- **Right to data portability:** You have the right to obtain and reuse your personal data for your own purposes across different services.
- **Right to object to processing:** You have the right to object to certain types of processing.
- **Right to lodge a complaint:** You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection authority.
- **Right to withdraw consent:** If You have given consent to anything we do with your personal data, You have the right to withdraw that consent at any time.
- **Right not to be subject to automated decision-making:** You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects (or similarly significant effects) concerning You.

The Company usually responds to requests and provides information free of charge, although we may charge a reasonable fee to cover administrative costs for:

- unfounded or excessive/repetitive requests; or
- multiple copies of the same information.

You can send your communications and exercise your rights by sending a written request to the following email address: **dpo@brickken.com**. In some cases, the request may be denied if it seeks the deletion of data required to comply with legal obligations.

## **8. Complaints to the Data Protection Supervisory Authority**

The Company intends to respond to any concerns or questions you raise about the use of your personal data. Every data subject has the right to lodge a complaint with supervisory authority. If you believe our processing of your personal data violates any data protection laws, you may exercise your right to file a complaint with the supervisory authority in the Member State where you reside, work, or where the alleged violation occurred.