

# **Global Candidate Privacy Notice – Applications via Ashby**

This Privacy Notice explains how, when and why we collect and use your personal data when you interact with Kandou via the applicant tracking system, Ashby Inc., as a candidate.

‘Personal data’ is any information or set of information that can identify you as an individual such as your name, address, telephone number, email address as well as any other information about you that Kandou/Ashby Inc. may obtain from you directly or indirectly.

We are committed to being transparent in the way we collect and use your personal data and how we protect it. We also recognise your need for reasonable control of your personal data.

- Who is responsible for your data?
- Why do we process your data?
- What personal data do we collect and why?
- The Legal basis
- AI Assisted recruitment tools and automated processing
- AI Notetaker: interview recording, transcription and summaries
- Who do we share it with?
- International transfers and Ashby Inc. storage
- How long do we store your personal data?
- Your rights
- Indirect sources
- Changes to this notice

## **1. Who is responsible for your data?**

The controller responsible for processing your personal data is:

**Kandou Bus S.A.**  
Rue des Jordils 1B  
1025 Saint-Sulpice  
Switzerland

Email: [hr@kandou.ai](mailto:hr@kandou.ai)

For questions about this notice or your data protection rights, please contact us at [hr@kandou.ai](mailto:hr@kandou.ai).

## **2. Why do we process your data?**

We process your personal data to:

- receive and administer your application;
- assess your qualifications and suitability for the role;
- communicate with you and arrange interviews;
- collect and evaluate job-related interview feedback;
- conduct checks that are permitted or required by applicable law;
- prepare and document recruitment decisions and, where relevant, an employment offer;
- protect the security of our recruitment systems and prevent misuse; and
- where separately permitted, contact you about future opportunities.

We use **Ashby Inc.** as our cloud-based Applicant Tracking System (ATS) to manage these activities. Ashby processes personal data on our behalf under a Data Processing Agreement (DPA) and does not make our recruitment decisions independently.

## **3. What personal data do we process?**

Depending on your application and applicable law, we may process:

- name and contact details;
- CV, résumé, cover letter, application form, employment history and qualifications;
- interview notes, assessments and job-related feedback;
- communications and scheduling information;

- right-to-work or work-authorisation information where required and lawful; and
- technical and security information, such as account, access, timestamp and audit-log data.

Please provide only information relevant to the application. Do not include special-category data or other sensitive information unless we specifically request it or it is necessary for a lawful accommodation process.

If you voluntarily provide diversity or accommodation information, we process it only where permitted by applicable law, for the stated purpose, with restricted access and, where appropriate, your consent or another specific legal basis.

#### **4. The Legal basis**

The legal basis depends on the purpose and the applicable law. It may include:

- taking steps at your request before entering into an employment contract;
- compliance with legal obligations, such as employment, immigration or equal-treatment requirements;
- our legitimate interests in managing recruitment, maintaining security and improving our processes, where those interests are not overridden by your rights; or
- your consent for genuinely optional processing, such as retention in a talent pool, optional diversity information or interview recording where consent is required.

Where consent is used, you may withdraw it at any time. Withdrawal does not affect processing carried out before withdrawal and does not affect processing based on another lawful basis.

#### **5. AI-assisted recruitment tools and automated processing**

We use AI-assisted features available in Ashby Inc. to support, but not replace, human recruitment decisions. Depending on the role and the configuration in use, these features may include:

- **AI-Assisted Application Review:** evaluating and ranking applications against recruitment criteria set by Kandou Bus S.A. during the initial review stage;

- **Enhanced Resume Parsing:** extracting, structuring and organising information from CVs and résumés;
- **Candidate Assistant:** analysing candidate profile information to support recruitment-related interactions;
- **AI-assisted interview and candidate summaries:** generating summaries or other internal recruitment-support outputs from information entered or generated during the recruitment process; and
- **Talent Rediscovery:** identifying potentially relevant former candidates from our database if and when this feature is activated and used.

These tools may analyse information contained in your application and related recruitment records and may generate recommendations, rankings, extracted information or summaries. Authorised HR personnel, hiring leads remain responsible for reviewing relevant AI-generated output, applying human judgement and making the final recruitment decision. We do not make a recruitment decision solely by automated processing where that decision would produce legal or similarly significant effects.

We do not use AI-assisted tools to assess protected characteristics or to make decisions based on irrelevant personal characteristics. Interview assessments must remain objective and job-related.

Where required by applicable law, you may request further information about the logic involved, the expected consequences and your rights concerning this processing. You may also contact us at [hr@kandou.ai](mailto:hr@kandou.ai) with questions or to challenge a decision.

## **6. AI Notetaker: interview recording, transcription and summaries**

Where enabled for a particular interview, Ashby's AI Notetaker may automatically record, transcribe and summarise the interview. The recording, transcript and summary may be used to support accurate interview documentation and job-related assessment.

You will be informed **before the interview** if AI Notetaker will be used. Where required by applicable law, we will obtain your consent before recording or transcribing the interview. If consent is required and you do not provide it, we will offer an appropriate alternative process where reasonably practicable, such as taking manual notes without recording.

Recordings, transcripts and summaries are accessible only to authorised persons involved in the recruitment process and are deleted in accordance with the retention periods in Section 9, unless a longer period is required by law or necessary for a legal claim. You may

contact [hr@kandou.ai](mailto:hr@kandou.ai) with questions about a specific interview recording or to exercise your rights.

## **7. Who do we share it with?**

Your data may be accessed by authorised HR personnel, the Hiring Lead and interviewers involved in the relevant role, and Legal, IT or security personnel where necessary. We may also disclose data to service providers supporting recruitment, such as Ashby, background-check providers or recruitment agencies, where there is a lawful basis and appropriate contractual safeguards.

We do not make your application publicly available and do not sell your personal data.

## **8. International transfers and Ashby Inc. storage**

Your personal data is stored and processed in the United States by **Ashby, Inc.**, our ATS provider. Ashby states that it is an active participant in the EU-U.S. Data Privacy Framework, including the UK and Swiss Extensions. For transfers covered by the relevant Framework, the Framework provides the applicable adequacy mechanism for transfers to the United States.

A DPA is in place between Kandou Bus S.A. and Ashby, Inc. The DPA governs Ashby's processing, security obligations, sub-processors and assistance with data protection compliance. Where a transfer is not covered by an adequacy decision or the relevant Data Privacy Framework, we will use another legally recognised transfer mechanism, such as Standard Contractual Clauses or an equivalent safeguard.

Ashby may also use approved sub-processors. Information about relevant sub-processors and processing locations can be obtained from [hr@kandou.ai](mailto:hr@kandou.ai), subject to applicable confidentiality restrictions.

## **9. How long do we store your personal data?**

Unless a longer period is required or permitted by applicable law:

- unsuccessful application data is retained for **12 months after the recruitment process ends**;
- interview notes, recordings, transcripts and summaries are retained for **12 months from the relevant interview date**; and
- data retained for future opportunities is kept only for the period stated when consent is collected or otherwise permitted by law.

Successful applicants' data is transferred to the relevant employee HR process and retained under the applicable employee privacy notice and retention schedule. We may retain limited information longer where it is necessary to establish, exercise or defend legal claims or comply with a legal obligation.

## **10. Your rights**

Subject to applicable law, you may have the right to:

- obtain access to your personal data;
- request correction of inaccurate or incomplete data;
- request deletion of your data;
- request restriction of processing;
- object to processing based on legitimate interests;
- receive or request portability of data where applicable; and
- withdraw consent where processing is based on consent.

To exercise a right, contact [hr@kandou.ai](mailto:hr@kandou.ai). We may need to verify your identity. We will respond within the period required by applicable law, normally one month under the GDPR, subject to permitted extensions.

## **11. Indirect sources**

If we receive your personal data from a recruiter, referral, job board or another source rather than directly from you, we will provide any additional information required by applicable law, including the source and relevant categories of data.

## **12. Changes to this notice**

We may update this notice when our recruitment processes, systems, providers or legal obligations change. The current version will be made available through the careers site or Ashby candidate portal.

By submitting an application, you confirm that you have had the opportunity to read this Candidate Privacy Notice. This acknowledgement is not, by itself, consent to processing unless a separate, clearly identified consent is requested.