

Candidate Privacy Notice

This privacy notice describes how we collect and use your personal information you provide to us, in accordance with the General Data Protection Regulation. The intended audience of this notice includes candidates who wish to seek employment with Noroutine GmbH (hereinafter referred to as the "Company"). Company only processes your data when it is in our legitimate interests to do so and when these interests are not overridden by your data protection rights. Our registered office is at Berg-am-Laim Str., 64, 81673, Munich, Germany and registered under company number HBR 243905 in District Court of Munich.

Why Do We Collect Your Personal Information?

As part of any recruitment process, Company collects and processes personal data relating to job applicants to meet our legal, statutory and contractual obligations and to provide you with our services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

What Information Do We Collect?

Information collected and processed for finding you a suitable role is as follows:

- Contact information (e.g. name, postal and email addresses)
- Qualifications, skills and competencies
- CV and documents supporting your job application/s
- Employment history
- Job preferences including role, geographical areas and remuneration

Any other work-related information you may provide Information in respect to individuals who we engage is as follows:

- Passport
- DOB
- In some cases, permits and visas
- PPS number
- Details of job offers and placements
- Outcome of background and criminal record checks for certain roles
- In certain cases, medical information
- Professional references
- Financial information (including but not limited to payroll details and terms)

Candidates who would be self-employed contractors will need to provide some additional information which will include:

- Certificate of Incorporation
- Details of Public Liability Insurance
- VAT registration

What Is the Legal Basis for Processing Your Data?

The above information is used to provide our services to you in our capacity as an employment business to find you suitable work whether on a temporary, contract or permanent basis, based on your requirement.

The legal basis and purposes for processing your personal data are detailed below:

- The processing is necessary for the performance of a contract. Once the candidate has been successful in securing employment, then they are subject to a contract of employment for which certain data processing activities are essential in order to perform the contract
- In addition. Where necessary for compliance with a legal obligation e.g. application forms and interview notes are
 maintained for 24 months post application to enable feedback or challenge legal action taken against the Company
- Any requirement to include special categories of personal data per Article 9 of the GDPR will rely on the consent of the data subject.
- Any requirement to collect information from a 3rd party, will rely on your consent and you will be made aware of the collection and reasons for it.
- The data subject is informed of all processing activity and what data shall be processed for what reasons. The data subject is informed of their own rights.



Who Will We Share Your Personal Information With?

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. We will only share your personal information with the organisations we are working with when you are put forward for an opportunity. Once you have secured a placement additional information may be provided to the client to enable the placement to proceed. Such organisations will usually be located inside the European Economic Area (EEA) but may be outside of the EEA. Personal data shall not be transferred to a country or territory outside the EEA unless the European Commission ensures that country or territory has an adequate level of protection or the appropriate safeguards are in place for your rights and freedoms. Before such a transfer takes place outside of the EEA, we will provide you with further information concerning this.

Other trusted third parties that we may share your data with are companies for undertaking preengagement checks for certain roles. We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

Safeguarding Measures

Company takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place We will store your data in our an internal system only accessible by our recruitment team. Our recruitment team can search and process this data, only in order to provide you with recruitment services. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How Long Do We Keep Your Data?

Company only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. With your explicit consent, the Company will hold your data for no longer than 2 years to enable the Company to consider the applicant for future opportunities. Extensions to this time limit may be sought on a biennial basis. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your Rights

Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information:

- Request access to your personal information
- Request correction of the personal information that we hold about you
- Request erasure of your personal information
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground
- Request the restriction of processing of your personal information
- Request the transfer of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email: privacy@noroutine.me

If we receive a request from you to exercise any of the above rights, we will ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Right to Withdraw a Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email: privacy@noroutine.me

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If we receive



a request from you to exercise any of the above rights, we will ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Consequences of Not Providing Your Data to Us

You are not obligated to provide your personal information to Noroutine. However, if you do not provide the information, we may not be able to process your application properly or at all.

Automated Decision Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

How do We Inform You About Changes?

Any changes in regard to how we collect, process and retain your personal data due to revised legislation or business reasons will be published on our Web page https://noroutine.me/

Lodging a Complaint

Company only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information please contact:

Noroutine GmbH Data Protection Officer Berg-am-Laim Str. 64 81673 München

or electronically at

dpo@noroutine.me

You also have the right to complain to the supervisory authority in the Germany for data protection matters – The Federal Commissioner for Data Protection and Freedom of Information (BfDI). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the BfDI.