



Multitude Group's Recruitment Privacy Policy

Last updated on April 02, 2024

1. Introduction

Multitude SE and its affiliates and subsidiaries (hereinafter "Multitude", "we", "us" or "our"), as properly identified to the job applicant during the application process, respect the privacy of the personal information of the individuals with whom we interact. This Recruitment Privacy Policy (hereinafter "Policy") describes the personal information that Multitude collects from job applicants in connection with our online and offline recruitment activities, and how we use and to whom we disclose that information.

Multitude has adopted a series of privacy related policies in order to address the specific privacy concerns of certain groupings of individuals and specific issues relating to the use of our website. This Policy applies only to the personal information of all individuals who seek to be employed by Multitude (hereinafter "job applicant" or "you"). Multitude is committed to being transparent towards our job applicants, therefore the rules of this Policy are followed by all Multitude companies.

2. What is personal information?

For the purposes of this Policy, personal information is any information about an identified or identifiable individual. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

3. What personal information do we collect?

We collect and maintain different types of personal information in respect of those individuals who seek to be employed by us. This includes personal information contained for example in:

- resumes and/or applications. Should your application include names and contact details of referees, then kindly note that it is your responsibility to obtain consent from your referees prior to providing us personal information about them;
- references and interview notes;
- photographs and videos;
- letters of offer and acceptance of employment; and
- background screening information.

The examples listed above contain information such as name, home address, telephone, personal email address, date of birth, personal identification number, marital status, and any other information disclosed and collected during an application for employment with Multitude.

Generally, Multitude collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, you will be informed that your personal data will be obtained by us from such sources. Where this is the case, we will



take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your consent. Where this is the case, we will inform you before we seek out this information.

4. Monitoring

Multitude uses a surveillance system within its premises to monitor and record office entry and exit points and server rooms. The areas monitored are marked with respective informative signs. Surveillance cameras are there for the protection of employees, Multitude and third parties, and to protect against theft, vandalism and damage to our goods and property. Recorded images are routinely destroyed after every 90 days and not shared with third parties unless there is a suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.

5. How do we use personal information?

Personal information is used and disclosed for our business purposes and for establishing your employment relationship with us. Such uses include:

- determining eligibility for initial employment, including the verification of references and qualifications;
- assessing qualifications for a particular job;
- protecting our rights and fulfilling our legal obligations; and
- such other purposes as are reasonably required by Multitude in connection with your application and possible employment.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

We process the personal information generated throughout the recruitment and business process based on:

- our legitimate interest to the extent these activities do not prejudice or harm your rights and freedoms;
- our legal obligations where employment law or other laws require the processing of your personal information (for example to the extent the law requires the monitoring equality of opportunity and diversity);
- your consent; and
- preparing and concluding an employment (or similar) contract with you as relevant.

6. When do we disclose your personal information?

We may share your personal information with our employees, contractors, consultants, and other parties who require such information to assist us with establishing our employment relationship with you. In some instances, such parties may also provide certain information technology and data processing services to us so that we use to operate our business.



When we share personal information with such parties, we require that they only use or disclose such personal information in a manner consistent with the use and disclosure provisions of this Policy.

In addition, personal information may be disclosed or transferred to another party (including to another member of the Multitude group) in the event of a change in ownership of, or a grant of a security interest in, all or a part of Multitude through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Policy.

Further, your personal information may be disclosed to comply with valid legal processes, e.g., court orders, and to protect the rights and property of Multitude. We do not sell personal information subject to this Policy to third parties.

7. How is your personal information protected?

We endeavor to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification, or disclosure. Despite these safeguards, no method of transmission over the Internet or data storage is fully secure. In case we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

8. How long is your personal information retained?

We retain the data of job applicants who didn't conclude an agreement with us, subject to your relevant consent, for 1 (one) additional year after the recruitment process to record your recruiting activity with us and be able to inform you of new vacancies within that timeframe, except as otherwise permitted or required by applicable law or regulatory requirements. Please note that if you enter into an employment (or similar) contract with us, different retention periods apply.

We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

9. Exercising your rights to access, rectify or erase your personal information

You can request access to, and rectification or deletion of personal information that we hold about you.

To make such a request, please contact us by e-mail recruitment@multitude.com. Please note that any such communication must be in writing. In your request, please make clear what specific personal information you would like to have accessed, rectified, or deleted.

When requesting access to, or rectification or deletion of your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, rectify or delete, as well as to search for and provide you with the personal information that we hold about you.

Kindly note that your right to access, rectify, or delete the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse your request. In addition, the personal information may have already been



destroyed, erased, or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to, or rectification or deletion of your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

We will not discriminate against you for exercising any of your rights described in this Policy.

10. Addressing your inquiries or concerns

If you have any questions about this Policy or concerns about how we manage your personal information, please contact our Data Protection Officer by e-mail dpo@multitude.com. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you.

Should you be unsatisfied with our response, you may be entitled to make a written submission to Office of the Data Protection Ombudsman, address: P.O. Box 800, 00531 Helsinki, Finland, e-mail: tietosuoja@om.fi, or supervisory authority applicable for your jurisdiction.

11. Revisions to this Policy

Multitude may from time to time make changes to this Policy to reflect changes in its legal or regulatory obligations or in the way we deal with your personal information. We will communicate any revised version of this Policy by posting relevant news to our website. The modified policy will be effective once uploaded to our webpage.