



Multitude Group's Recruitment Privacy Policy

Last updated on June 23, 2025

1. Introduction

Multitude AG 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.

Surveillance monitoring is only applicable in situations where a job applicant physically enters Multitude premises, for example during an on-site interview or recruitment assessment.

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. These safeguards include measures such as access controls, encryption, secure storage environments, audit logging, and regular security assessments, which are designed to ensure the confidentiality, integrity, and availability of your personal information.

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. International Data Transfers

Due to the global nature of Multitude's operations, your personal information may be transferred to, stored in, or otherwise processed in one or more countries outside of the jurisdiction in which it was originally collected. These countries may have data protection laws that differ from those of your home country and may not be deemed to provide the same level of protection as your jurisdiction.



When we transfer your personal information to other countries, we do so in a manner that ensures an adequate level of protection, in accordance with applicable data protection laws. This may include implementing appropriate safeguards such as:

- Contractual arrangements, including standard data protection clauses or other approved mechanisms where required;
- Group-wide data protection policies and intra-group data transfer agreements that reflect applicable legal obligations; or
- Transfers based on adequacy decisions, where applicable under relevant data protection laws.

We ensure that any such transfers are made in compliance with applicable legal requirements and that your personal information remains protected in accordance with this Policy.

By applying to a position with Multitude, you understand that your personal information may be processed in this manner. Where required under applicable law, we will obtain your explicit consent before transferring your data across borders.

If you wish to receive further information about the international data transfer safeguards applicable to your personal information, you may contact us using the details provided in the “Addressing your inquiries or concerns” section of this Policy.

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

Depending on your location and the applicable data protection laws, you may have certain rights in relation to your personal information. These rights may include:

- Right of access – to obtain confirmation as to whether or not we process your personal information and, if so, to request access to that data;
- Right to rectification – to request correction of inaccurate or incomplete personal information;
- Right to erasure – to request deletion of your personal information in certain circumstances;
- Right to restriction of processing – to request that we limit the use of your personal information under certain conditions;
- Right to data portability – to request that your personal information be provided to you or a third party in a structured, commonly used, and machine-readable format;
- Right to object – to object to our processing of your personal information, where permitted by applicable law;
- Right to withdraw consent – to withdraw any consent you have previously given at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- Right not to be subject to a decision based solely on automated processing, including profiling, where such decision produces legal or similarly significant effects on you, unless permitted by applicable law.

To exercise any of your rights, or to inquire about your rights, please contact us via e-mail at recruitment@multitude.com. We may request additional information from you to confirm your identity and verify your entitlement to the requested information, particularly before disclosing any personal data.

Please be aware that your rights may not be absolute. In some cases, legal or regulatory obligations, legitimate business needs, or exemptions provided under applicable data protection laws may limit



or restrict your rights. Where we are unable to fulfil your request, we will inform you of the reason for our decision, unless we are legally prohibited from doing so.

We aim to respond to all legitimate requests within one (1) month of receipt, or within any other timeframe required by applicable law. In some cases, particularly where requests are complex or numerous, we may need additional time, in which case we will inform you accordingly.

You will not be discriminated against or otherwise suffer any adverse consequences as a result of exercising your data protection rights under this Policy.

If you are dissatisfied with the way we handle your personal information or your request, you may lodge a complaint with us or the data protection supervisory authority in your jurisdiction. You can find the relevant contact details in the “Addressing your inquiries or concerns” section of this Policy.

11. Addressing your inquiries or concerns

If you have any questions about this Policy or concerns about how we handle your personal information, we encourage you to contact us. We are committed to addressing privacy-related matters in a transparent and responsible manner.

For general questions or to exercise any of your data protection rights, please contact our recruitment team at recruitment@multitude.com.

If your concern relates specifically to the handling of your personal information or the exercise of your data protection rights, you may also contact our Data Protection Officer at dpo@multitude.com.

When you apply for a position within Multitude, the specific Multitude entity to which you submit your application acts as the data controller or equivalent responsible entity of your personal information. The relevant Multitude entity is typically indicated in the job posting, application platform, or communication you receive during the recruitment process.

If you believe your rights have not been respected, or that your personal information has been processed in a way that is not compliant with applicable data protection laws, you have the right to lodge a complaint with the data protection supervisory authority in the jurisdiction where the relevant Multitude entity is located or, where applicable, in your country of residence.

We recommend contacting us first so that we can address your concern directly and efficiently.

12. 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. The modified policy will be effective once uploaded to our webpage.