

APPLICANT DATA PROTECTION NOTICE

This Applicant Data Protection Notice describes how **Vivid Money GmbH** (“Vivid Money”, “we”, “us”) handles personal data you submit when applying for a job. Please read this document carefully to understand how and why we collect, process, share and protect the information you provide.

Data Controller and How to Contact Us

The controller responsible for the collection and processing of your personal data in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) is:

Vivid Money GmbH

Kemperplatz 1

10785 Berlin, Germany

Commercial Register HRB 209049 B

If you have any questions about this notice or if you believe that your personal data is not handled in accordance with the applicable law, you can contact us at privacy@vivid.money.

Personal data we collect about you

When you apply for a job at Vivid Money, we ask you to provide us with your personal data so we can evaluate your application. If this data is not provided, our ability to consider you as a candidate may be limited. You may also provide us with the personal data that we have not specifically requested (for example, your CV or cover letter may contain information about your hobbies, social preferences, etc). That information is provided on a voluntary basis and you determine the extent of it.

Personal data we collect about you may include:

- Personal details: full name, address, telephone number, email, date of birth, preferred language.
- Education details: educational background, including degrees, certificates, transcripts.
- Employment details: work experience, including company, position, dates of employment, references, current salary, expected salary. Please note that it is your responsibility to obtain consent from your references prior to providing us with their personal data (for example, names, contact and position details).
- Social media pages and other open sources (e.g. LinkedIn).
- Sensitive personal data: we usually do not request or require sensitive personal information regarding religion, health, sexual orientation or political affiliation in connection with your application. If you have a disability and would like us to consider an accommodation, you may provide that information during the recruitment process.

- Where applicable, we may be obliged to seek information about your criminal convictions and offences. If we do, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.
- Any other information you choose to share with us - such as personal or social preferences, hobbies, etc.

How we use your personal data

Vivid Money will use your personal data for the following purposes:

- recruitment, selection, evaluation and appointment of job candidates for the job you have applied for and for subsequent job opportunities;
- general HR administration and management (in case you become a Vivid Money employee);
- application analysis such as verification of your employment references, background checks and related assessments;
- compliance with corporate governance and legal requirements (for example, our obligations in employment and the safeguarding of your fundamental rights);
- communicate with you and to inform you of the current status of your application and future opportunities (unless you have told us that you do not want us to keep your information for such purposes).

Profiling and automated decision making

We do not make any automated decisions in relation to your application without human involvement.

Who we share your personal data with

We share your personal data only with those who really need it in order to perform their tasks and duties, and to third parties with a legitimate business need. We may disclose your personal data to the following types of third parties:

Service providers

We may share your personal information with third parties who provide services to us such as recruitment agencies, consultants and attorneys. If your personal data is shared in this way, we do so only on a “need-to-know” basis and we will seek to ensure it is only used in connection with the functions or services these parties will be performing for us and that your personal data is treated by them in a confidential manner. These service providers that we use may change, but we will always seek to ensure that any third parties who handle your personal data will do so in a manner consistent with this Data Protection Notice and in accordance with applicable law.

Vivid Money group companies

We may share your personal data with employees across Vivid Money when it is necessary, for example, if the vacancy you are applying for requires collaboration with colleagues from other companies in the Vivid Money group.

Other third parties

We may also disclose your personal data to other third parties including:

- As necessary to comply with our legal obligations, including in order to respond to a lawful government request, court order, administrative or judicial process (such as a subpoena or a search warrant);
- As necessary to establish, exercise or defend our legal rights;
- As necessary to protect your vital interests (for example, we may need to share your personal information with third parties in the event of an emergency);
- Where we obtained your consent.

Lawful basis for processing

For the purposes described above, we process your personal data (i) for the performance of a contract or in order to take steps at your request prior to entering into a contract; (ii) on the basis of our legitimate interests - for example, recruitment, selection, evaluation of potential employees; (iii) legal obligation - in cases such as immigration/visa status verification or accommodations for disabled applicants.

How long we keep your personal data

Your personal data will be retained for as long as necessary to determine if your application has been successful. In this case, your data will be added to your employee file.

If your application is unsuccessful, we will keep your details on file for six months after the position you applied for was filled, in order to consider you for future employment opportunities. At the end of that period, or if you object to this processing earlier, we will delete your information. With each update of your applicant profile or each new job application the six-month period begins anew.

International transfers

Our partners, subsidiaries, affiliates and third parties, to which your personal data can be disclosed may be located throughout the world, including outside the EEA; therefore, the data may be sent to countries with different data protection laws than your country of residence. In such cases, we take measures to ensure that your personal data receives a comparable level of protection - for example, we use the Standard Contractual Clauses approved by the European Commission, or other applicable mechanisms.

Your rights

Data Protection laws provide you with rights to help you understand and control how your personal data is used. These are your rights:

- Right **to be informed** about why and how we are processing your personal data - we hope we achieved this by providing you with this Data Protection Notice.
- Right **to have access** to your data - you have the right to ask us if we are processing your personal data, why we are doing so, under what lawful basis, the categories of your personal data, whether the data is being sent outside the EU, who we share your data with, how long we keep it, and request a copy of the data we are processing. If you are unable to find sufficient information in our Data Protection Notice, please contact us at *privacy@vivid.money*.
- Right **to object** to some processing - direct marketing, or if processing is based on legitimate interests.
- Right **to have your data deleted** - otherwise known as “right to be forgotten”. You can exercise this right if you withdraw your consent and there is no further legitimate interest in our processing of your data, your objection to processing under legitimate interests outweighs our interests, the processing is no longer necessary, there is a law that requires the data to be deleted, or the processing is unlawful. If you would like to exercise this right, please contact us at *privacy@vivid.money*.
- Right **to restrict processing** - if the personal data we are processing is inaccurate, if our processing is unlawful, if the data is no longer necessary for the original purpose of processing but needs to be kept for potential legal claims, or you have objected to processing carried out under legitimate interests and we’re still in the process of determining whether there is an overriding need to continue processing.
- Right to **data portability** - you can ask for your data that we process using a computer, which you provided to us on the basis of consent or because it was necessary for a contract.
- Right to ask us about **automated decision-making** - we don’t do that, but if we did, you would have the right to ask us to explain the logic involved in making any automated decisions and for the decision to be reviewed by a human being, if that decision had an effect on your rights or freedoms.
- Right to **rectification** - if any of your personal data that we hold is inaccurate, you can request to have it corrected.
- You have the **right to lodge a complaint** with the appropriate data protection authority if you have concerns about how we process your personal data. However, we would appreciate it if you contacted us first and gave us an opportunity to resolve the issue.

Reasonable access to your personal data will be provided upon request made to us at privacy@vivid.money. If access cannot be provided within a reasonable time frame, we will let you know the date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied.

Security of your information

To help protect the personal data you provide, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your data. We commit to taking appropriate disciplinary measures to enforce our employees' data protection responsibilities.

Your responsibilities

You are responsible for the information you provide to us and that it is honest, truthful, accurate and not misleading in any way. If you provide information concerning any other person such as individuals you provide as references, you are responsible for providing any notices and ensuring your referee consents to our collecting and processing that information as described in this Data Protection Notice.

Changes and updates to this Data Protection Notice

As our organization changes from time to time, this notice is expected to change as well. It may also be supplemented by other statements as needed to comply with new or local requirements in the country where you live, or where employee representation agreements exist. If material changes are made to how we process your personal data, you will be provided with a copy or information on how to access the updated notice.