

Applicant Privacy Notice

Effective date: 7 July 2023

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1. Purpose and Scope of Notice

Keywords Studios Group (“**Keywords**”, “**we**”, “**us**” or “**our**”) knows that you care about how your Personal Data is used and shared, and we take your privacy seriously. When we reference **Personal Data**, we mean any information which Keywords has or obtains or which an individual provides to us from which that individual can be directly or indirectly personally identified or as that term (or similar term) is defined under applicable law.

Accordingly, we have implemented this Applicant Privacy Notice to explain how your Personal Data will be handled by Keywords where:

- you participate in a Keywords recruitment initiative;
- you voluntarily submit your CV/resume to a representative of Keywords on an ad hoc basis;
- you apply for an advertised job with Keywords in; and/or
- a recruiter provides your CV/resume to Keywords and we arrange a job interview with you.

Overall, your Personal Data will be under the responsibility of Keywords and the specific data controller of your Personal Data is the member of Keywords to whom your Personal Data is sent. For more information about Keywords, including a full list of entities in Keywords, please refer to Keywords’ contact page (www.keywordsstudios.com/contact). These entities within Keywords have put in place procedures to ensure that your Personal Data is protected, as can be seen in further detail in our general Privacy Notice that is available on our website: <https://www.keywordsstudios.com>.

If you are a California resident, please see our **CA Applicant Privacy Notice** on page 6 of this Applicant Privacy Notice.

This notice applies to any and all job applications submitted, and recruitment initiatives coordinated by Keywords. If you have any questions or concerns about this notice, please contact us at privacy@keywordsstudios.com.

IMPORTANT: When you provide your CV to a recruiter who subsequently sends it to us, we encourage you to read the relevant recruiter’s data protection notice to understand how your Personal Data is processed by the recruiter (as a separate and independent controller to us).

2. Application of this Notice

This notice applies to the way we collect and process your Personal Data from the time you provide Personal Data in an application up to the point at which you commence employment with us (if at all). Once you commence employment, the way we process your Personal Data will be governed by our Employee Privacy Notice (which will be made available to you when you commence your employment with Keywords).

3. What Personal Data We Process

As part of the recruitment and job application process, we collect the Personal Data that you submit to us, which may include:

- personal details such as your name, gender, residential address, email address, contact telephone numbers, nationality, marital status, country of birth or previous criminal convictions (where permitted by applicable law);
- details about your previous employment such as your length of service and your role;
- details about your qualifications such as your skills, education, the languages you speak (including your proficiency), your eligibility to work in a particular country (e.g., your citizenship or visa details), your experience in the job you apply for and other industries;
- details about your preferences such as positions you may be interested in, information about when you may be available to interview and/or start work for Keywords (i.e. your current notice period) or work on ongoing basis (e.g. full or part time or on weekends), whether you are open to relocation or working remotely, whether you are willing to travel for work and whether you have your own transport;
- details you may provide to us in response to our queries or questions at interview stage (including information about you which we generate throughout the interview and/or recruitment process); and
- details about you which we gather from publicly available sources such as the internet and your social media accounts where such searches are relevant to the job you have applied for within Keywords.

If you apply for a position through LinkedIn, we may use the information you have previously provided to LinkedIn to populate your application. We will ask you to authorise LinkedIn to share your Personal Data with us for this purpose.

It is necessary for us to process your Personal Data in order to assess your job application and/or include you in a recruitment initiative. Ultimately, it may also be necessary for us to process your Personal Data in order to take steps to offer and enter into a contract of employment with you. In the event that you do not wish to provide us with your Personal Data for the purposes outlined in this notice, we will not be able to assess your job application and/or include you in a recruitment initiative and/or offer you a contract of employment.

Please note that should you include information you think is relevant to your job application or the recruitment initiative, including cover letters, references from your previous employers and other documents that are likely to contain your Personal Data, we will hold and process any such Personal Data in accordance with the terms of this notice.

4. Why we process your Personal Data

If you are from a region that requires a legal basis for processing personal data (such as the European Union or the UK), our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it but we will only process your Personal Data if we have a lawful basis for doing so. In such circumstances, the table below details how Keywords will use your Personal Data for our commercial or business purposes (“**Purposes**”) and the context for which we use your Personal Data (“**Legal Basis**”).

Legitimate interests	
Legal Basis	We may obtain, collect and process your Personal Data where it is necessary for the purpose of facilitating the recruitment process.
Purposes	<p>We obtain, collect, and process your Personal Data to:</p> <ul style="list-style-type: none"> • Process your job application, including to contact you in relation to interviews and/or offer you a job after the interview stage; • Assess your Personal Data against vacancies which we think may be suitable for you; • Verify details you have provided to us using third party sources; • Request information from third parties such as qualifications and references; • Carry out background checks; • Retain your information (should you be unsuccessful) in order to contact you in relation to future vacancies within Keywords that may be of interest to you; • Maximise the number of potential candidates who are informed about job opportunities; • Collect feedback on and evaluate the recruitment process; and • Promote internal and external recruitment events.
Compliance with a legal obligation	
Legal Basis	It is necessary to process your Personal Data in order to comply with legal obligations imposed on us as an employer under applicable EU Member State, European Union law or UK law.
Purposes	<p>We obtain, collect and process your Personal Data in order to comply with the following legal obligations to:</p> <ul style="list-style-type: none"> • Comply with local laws in Europe, the European Union or the UK relating to employment, equality and health & safety; • Comply with Irish, UK and European Union tax laws; and • Comply with other applicable local laws in Europe, European Union and the UK.

Where required by applicable law, we will only use your Personal Data for the purposes for which we collect it (as outlined in this section), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you as and when required by applicable data privacy laws and we will explain the legal basis that allows us to do so.

5. Disclosure of Personal Data

We may disclose some or all of your Personal Data to the following parties:

- internal business units such as Human Resources, IT, Finance/Payroll, Keywords managers, system administrators and support staff who have advertised a vacancy within their unit or who will interview you;
- your previous employers where you have provided them as a reference;
- recruitment agencies;

- members and shareholders of Keywords;
- outsourced service providers who assist Keywords with recruitment initiatives and campaigns such as Workable; and
- professional advisors such as legal advisors, consultants and accountants.

6. Transfer of your Personal Data

We may transfer your Personal Data outside the European Economic Area ("EEA") to other members of Keywords and to other entities ("Recipients"). Certain Recipients (our third party service providers and other companies within Keywords' group) who process your Personal Data on our behalf may transfer your Personal Data outside the EEA to a country that does not provide an adequate level of protection to your Personal Data. Where such transfers occur, it is our policy that: a) they do not occur without our prior written authority; and b) that an appropriate transfer agreement such as the Standard Contractual Clause Contracts or other approved transfer mechanisms approved by the European Commission and supervisory authorities (such as the Data Protection Commission) is put in place to protect your Personal Data.

7. Retention of your Personal Data

Where you are a **successful job applicant**, the Personal Data generated by us and provided by you over the course of the job application/recruitment process will be retained by us for the purpose of your contract of employment. Such Personal Data will be retained in accordance with our Employee Privacy Notice (which will be available to you when you commence employment).

Where you are an **unsuccessful job applicant** and unless otherwise agreed, we will retain your Personal Data for a period of up to **12 months** after you attend an interview or submit a job application for the purposes of both contacting you in relation to future vacancies within Keywords which we think may be of interest to you and for the purpose of defending potential employment equality claims which you may bring against us.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

8. Your Rights and How to Exercise Them

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at privacy@keywordsstudios.com.

- **Access:** You may at any time request a copy of your Personal Data from Keywords. This right can be exercised by writing to us at privacy@keywordsstudios.com.
- **Rectification, Erasure & Restriction:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you the right to correct any inaccuracies in, and in certain circumstances, to request erasure, or restriction on the use, of your Personal Data, and to object to certain uses of your Personal Data, in each case subject to the restrictions set out in applicable data privacy laws. Further information on these rights, and the circumstances in which they may arise in connection with Keywords' processing of Personal Data can be obtained by writing to us at privacy@keywordsstudios.com.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right has the right to change your

mind and withdraw consent to future processing of Personal Data by writing to us at privacy@keywordsstudios.com.

- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** Where Keywords is relying on a legitimate interest, in order to use and disclose Personal Data, you may object to such use or disclosure of your Personal Data, and we will cease to use and process the Personal Data for that purpose, unless we can show there are compelling legitimate reasons for processing to continue or we need to use the Personal Data for the purposes of legal claims.
- **Right to File Complaint:** You have the right to lodge a complaint about Keywords' practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

9. Changes to this Applicant Privacy Notice

We may need to change this Privacy Notice from time to time to reflect changes in technology, law, business operations or any other reason we determine is necessary or appropriate, but we will alert you to any material changes by placing a notice on the Website, by sending you an email and/or by some other means.

10. Contact Information

Please refer to our general Privacy Notice (accessible on our website: www.keywordsstudios.com) for this information.

CCPA Applicant Privacy Notice

This California Applicant Privacy Notice and Notice at Collection (“**CA Applicant Notice**”) provides specific information for residents of California who apply to work with Keywords. This CA Applicant Notice is intended to satisfy our notice requirements under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (Cal Civ. Code § 1798.100 *et seq.*) (“**CCPA**”) and explain how your Personal Data will be handled by Keywords. Personal Data, as used in this CA Notice, also includes “personal information,” as that term is defined under applicable state privacy laws.

1. Scope

This CA Applicant Notice applies to applicants and other candidates for employment who are California residents and who apply to a position with Keywords. This CA Applicant Notice does not address or apply to our collection of Personal Data that is not subject to the CCPA.

For purposes of this CA Applicant Notice, Personal Data does not include the following:

- **Publicly Available Information.** Information that is lawfully made available from government records, or information we have a reasonable basis to believe is lawfully made available to the general public by you or by widely distributed media or by a person to whom you have disclosed the information and not restricted it to a specific audience.
- **Protected Health Information.** Information governed by the Health Insurance Portability and Accountability Act (“**HIPAA**”).
- **Deidentified or Aggregated Information.** Information that is deidentified or aggregated.
- **Information Covered by the Fair Credit Reporting Act (“FCRA”).** Information provided or issued by consumer reporting agencies that are subject to the FCRA (e.g., information contained in background check reports we obtain as part of our applicant screening process).

2. What Personal Data do We Process?

As more fully described in the ***What Personal Data We Process*** section of the Applicant Privacy Notice above, we collect (and have collected within the last twelve (12) months) the following categories of Personal Data:

- **Identifiers.** Such as real name, alias, job title, address, unique personal identifier, online identifier, email address, date of birth, social security number, driver’s license number, and other government identifiers.
- **Characteristics of Protected Classifications.** Such as age (40 years or older), race, ancestry, national origin, citizenship, physical or mental disability, sex, veteran or military status, and other characteristics of protected classifications under California or federal law.
- **Internet or Other Electric Network Activity Information.** Such as information about applicants’ interaction with our portals, website, applications, or advertisements, including, but not limited to, browsing history, clickstream data, and search history.
- **Audio, Electric, Visual, or Similar Information.** Such as information collected via call recordings, recorded meetings, videos, photographs, and video footage to secure our offices and premises.
- **Employment-Related Information.** Such as previous positions held, skills and experience, job duties, certifications, and licenses.
- **Education Information.** Such as education records, including grades, transcripts, student disciplinary records, or any other related information you chose to provide.
- **Sensitive Personal Information.** Such as your social security number, driver’s license number, race or ethnic origin, medical condition, and physical or mental disability.

- **Inferences and Preferences.** Such as inferences and preferences reflecting an Applicant's preferences, characteristics, attitudes, behaviours, and abilities.

3. Disclosure of Personal Data to Third Parties and Other Recipients

The categories of Personal Data we may have disclosed for a business purpose in the preceding twelve (12) months include:

- Identifiers;
- Characteristics of protected classifications;
- Internet or other network activity information;
- Audio, electronic, visual, or similar information;
- Employment-related information;
- Education information
- Inferences; and
- Sensitive personal data.

The categories of third parties and other recipients to whom we may have disclosed Personal Data for a business purpose may include:

- Affiliates and subsidiaries;
- Business partners;
- Vendors and service providers;
- Data analytics and marketing providers;
- Government entities (as and when required); and
- Operating systems and platforms.

4. Sources of Personal Data

We generally collect Personal Data from the following categories of sources:

- Directly or indirectly from you;
- Recruiters;
- Service providers;
- Social media sites (e.g., LinkedIn).
- Affiliates and subsidiaries; and
- Advertisers and analytics providers.

5. Purposes of Collecting and Disclosing Personal Information.

As more fully described in the ***Why We Process Your Personal Data*** section of the Applicant Privacy Notice above, in general we collect and otherwise process Personal Data for the following business or commercial purposes:

- **Recruiting and hiring purposes**, including applicant screening, conducting background checks, evaluation of qualifications and eligibility for employment, communicating with applicants, scheduling interviews, making job offers, promoting recruitment events, notifying you of other potential opportunities with Keywords, and to obtain feedback.
- **Complying with legal obligations, including** supporting our equal opportunity employment practices, for health and safety purposes, and for tax, accounting, and recordkeeping purposes.
- **Defending and protecting our rights**, including managing and responding to legal disputes and to otherwise establish, defend, or protect our rights or interests, or those of others.

Sensitive Personal Data. We do not collect, use, or disclose sensitive personal data beyond the purposes authorized by the CCPA.

6. Sale and Sharing of Personal Information

The CCPA, define "sale" as disclosing or making available Personal Data to a third-party in exchange for monetary or other valuable consideration, and "sharing" as disclosing or making available Personal Data to a third-party for purposes of cross-contextual behavioural advertising. We do not "sell" or "share" any applicant Personal Data. We also do not sell or share Personal Data about individuals we know are under age sixteen (16).

7. Retention of Your Personal Data

We retain your Personal Data as described above in the **Retention of your Personal Data** section of the Applicant Privacy Notice above.

8. Your Privacy Rights and Choices

California residents have the following rights regarding their Personal Data, subject to certain exceptions and qualifications under the CCPA.

- **Access and Data Portability.** You may have the right to request details about the Personal Data we have collected about you, such as whether we have collected Personal Data about you, the categories of sources, the purposes for which we have collected the Personal Data, the categories of recipients and the specific pieces of Personal Data we have collected. You may also have the right to receive a copy of your Personal Data in a readily usable format.
- **Correction.** You may have the right to request we correct incorrect or inaccurate Personal Data, subject to restrictions regarding the determination of accuracy of the existing Personal Data.
- **Deletion.** You may have the right to request deletion of your data unless an exception applies. Examples of exceptions include when we need to keep data to continue providing the Service, meet legal obligations, detect fraud, investigate violations of our Terms of Use (which is available on our website: www.keywordsstudios.com) or address security issues.
- **Opt-Out of Sale, Sharing, or Targeted Advertising.** We do not "sell" or "share" applicant Personal Data or use it for targeted advertising purposes, so there is no need to exercise your right to opt-out.
- **Limit Use and Disclosure.** We do not engage in uses of sensitive Personal Data that would trigger a *right to limit use and disclosure of sensitive personal information* under applicable state privacy law.
- **Opt-Out of Profiling with Legal or Significant Effects.** You may have the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects. However, as stated above, we do not engage in such activities as described under applicable state privacy law, so there is no need to exercise this right.
- **Non-Discrimination.** We will not discriminate against you in terms of price or service level for exercising any of the rights described in this section.

9. Exercising Your Privacy Rights

Please refer to the **California Privacy Notice** section of our general Privacy Notice (accessible on our website: www.keywordsstudios.com) for this information.