

# **Applicant Privacy Notice**

## **Data Controller**

Provable Labs takes precautions for the security and privacy of your personal data. This Privacy policy's purpose is to explain how and why we collect your personal data, and what we use it for.

In the context of General Data Protection Regulation, the Data Controller is:

Provable Labs B.V.

Keizersgracht 555

Amsterdam, The Netherlands

For all inquiries and complaints regarding the security and privacy of your data please contact: <a href="mailto:privacy@provablelabs.com">privacy@provablelabs.com</a>

## Data Privacy

Provable Labs uses Comeet, an application developed by Comeet Technologies Inc. (in further text "Comeet"), as part of our selection process.

Comeet, acting as a Data Processor, processes all personal data at our request and based on our instructions.

Provable Labs and Comeet have a contract of personal data processing to secure and protect your right to data privacy.

For additional information we'd like to refer you to Comeet's Privacy Notice: https://help.comeet.co/en/articles/3134994-privacy-notice

#### Personal Data Processed

- The data you fill out / provide in your job application include: name, surname, title, personal photo, position, hyperlinks to online profiles (eg., LinkedIn, Github, etc.), address, email address, Skype username, phone number, educational background, work experience, CV;
- Additional information you provided as part of your job application;
- The source who submitted your candidacy (eg., Recruiting Agency, Referral);
- The email correspondences between you and Provable Labs, and between Provable Labs and the source who submitted your candidacy;
- Information from your references;

Your personal data can also originate from other sources, such as online profiles (eg., LinkedIn, Github, etc.).

## **Analytical Information**

When you submit your application through a webform we will collect statistical and analytics information, including: IP address from which you accessed the webform, time and date of access, type of browser used, language use, links clicked.



## Data collection purpose

The collected data will be used for the selection process. This process may include the following:

- Verification of the entered data;
- Reference checks;
- Assessment of the qualifications and skills needed to perform the job you are applying for;
- Communication concerning the process (e-mails, phone calls, SMS messages, WhatsApp);
- Filling out questionnaires and tests;
- Fulfilling legal regulations.

The collected data will, once pseudonymized, also be used for reporting and analytical purposes to improve the quality of the selection process at Provable Labs.

#### **Data Access**

The access to your personal records is limited to Provable Labs employees who participate in the selection process.

The data is stored within the European Union, and access to it is secured with the highest level of technical standards and practices.

#### **Data Retention**

We will retain your personal data for an initial retention period of 6 months, after the latest of adding your data to Comeet, and the last activity performed regarding your candidacy.

Once that initial retention period has passed, your data will be pseudonymized for reporting purposes and in case you subsequently apply to another position.

All your data except for hiring steps, activities and source will be deleted, while distinctly identifying data, such as: email address, LinkedIn profile or phone number are hashed such that the data that remains can be restored if you subsequently apply to another position or if you are subsequently submitted for a position by others.

We may ask for your consent to keep your data for a longer period of time after the initial retention period, so that it can more easily contact you about opportunities in the future. In that case, the legal basis for retaining your data beyond the initial retention period is your consent. If you've given your consent, you can withdraw it at any time by contacting us.

Note that in any event, a backup copy of your data will be kept for a period of up to two months following pseudonymization, for purposes such as disaster recovery.



# Your Rights

You have the right to access, update or delete your information and obtain a copy of your information.

You may ask to receive a copy of your personal information that is stored, or request to have your information updated, corrected or deleted. You are also entitled to obtain your information in a structured, commonly used and machine-readable format, and have the right to transmit those data to another data controller.

You have a right to submit a complaint to the relevant supervisory data protection authority.

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in particular in the Member State of your residence, place of work or place of alleged infringement of the GDPR.

For a list of supervisory authorities in the EU, click <a href="here">here</a> (PDF document).