



Candidate Privacy Policy

Purpose

Klue (“we”, “us”) is committed to protecting the privacy of information we gather about applicants, and we greatly appreciate your trust. This Privacy Policy sets out the basis on which personal data collected from, or provided by you in connection with our recruitment processes will be processed. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided in your curriculum vitae and cover letter.
- The information you have provided on our application form, including but not limited to, as applicable, name, title, address, telephone number, personal email address, physical address, date of birth, gender, employment history, qualifications, work authorization information, any applicable certifications.
- Any information you provide to us during an interview.
- Any information relevant to our diversity, equity and inclusion (“DE&I”) initiatives, which will be gathered and held separately from applications to ensure meaningful equal opportunity monitoring and reporting, and which will not impact your candidacy.

How your personal information is collected

We collect personal information about candidates from the following sources:

- You, the candidate.
- Lever, an online software product that we use to assist with our recruitment process. We use Lever to process personal information as a data processor on our behalf. Lever is only entitled to process your personal data in accordance with our instructions.

- Published information on job boards such as LinkedIn, Glassdoor, etc..

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role you've applied for and other roles.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Internal monitoring and analysis of our outreach and growth in DE&I.

Data security

Clue is SOC 2 compliant. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will retain the right to contact you up to 12 months from the time of your application, and will securely hold your personal information for a period of 36 months from the time of your application. After this period, (or sooner upon receipt of your request), we will securely destroy your personal information.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under data protection laws, you have several important rights. In summary, those include rights to:

- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process

it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your situation which makes you object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please see the 'Contact Us' section below.

Right to withdraw consent

When you submitted your application, you provided consent to us processing your personal information for the purposes of the recruitment in question. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please email people@klue.com. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Contact Us

Any questions or requests relating to this Privacy Policy or your personal information should be directed via email to privacy@klue.com.