

SHARPIST'S RECRUITMENT PRIVACY POLICY

1. Introduction

Sharpist GmbH is committed to respecting your privacy and to complying with applicable data protection and privacy laws and regulations. This Recruitment Privacy Policy ("Policy") informs you about how Sharpist processes information which is collected about you during Sharpist's recruitment activities. It sets out what kind of Personal Data Sharpist may collect about you, how Sharpist processes your Personal Data during its recruitment activities, and what rights you have in relation to such data. "Personal Data" means information relating to you or another identifiable individual.

2. What Personal Data does Sharpist collect?

Sharpist collects Personal Data directly from you as well as from other available sources to the extent relevant and permitted by applicable local law. Sharpist endeavors only to collect Personal Data that is necessary for the purpose(s) for which they are collected and to retain such data for no longer than necessary for such purpose(s). Subject to applicable local law and practice, the categories of Personal Data that are typically collected and processed in the recruitment context are:

Information you provide: When you apply through our career page (which is connected to our recruitment management system "Recruitee") or otherwise interact with Sharpist (either directly or through an agency or other third party), you may be asked to provide Sharpist with your Personal Data, such as

- your name, street address, telephone number and email address and other contact details;
- your competences, skills, experience and education, e.g. your CV or resume, previous employments, educational details and qualifications, third party references

Technical Information: When you access our services online, our web servers automatically create records of your visit. These records typically include IP-address, access times, the sites linked from, pages visited, the links and features used, the content viewed or requested, browser or application type, language and other such information. See also our Privacy Policy (<https://www.sharpist.com/privacy>).

3. What will Sharpist do with your Personal Data?

Sharpist will collect, use, store and process your Personal Data for the purposes of Sharpist's recruitment activities. Whenever necessary and subject to statutory record-keeping requirements, Sharpist will delete and/or anonymize Personal Data that is no longer needed. Insofar as an employment relationship between you and Sharpist does not materialise, we may also continue to store your data as far as it is necessary to defend against possible legal claims. In this case the application documents are deleted two months after notification of the rejection decision, unless a longer storage period is required due to litigation. If you have consented to the processing of your Personal Data within the meaning of Clause 3 by applying for our Talent Pool, we will store your personal data for twelve months from the date of receipt of your application.

Sharpist will process your Personal Data for the following purposes:

- Communicating with you, in context of recruitment activities, such as:
 - To obtain additional information where necessary;
 - To inform you of available vacancies;
 - To provide you with information relating to your application and to fulfill your requests
- Managing recruitment activities, including activities related to organizational planning. In the course of recruitment activities, we may use your information:
 - To set up and conduct interviews and assessments;
 - To evaluate, select and hire applicants;
 - To contact third party references provided by you to evaluate your previous performances;
 - Or as otherwise necessary in context of recruitment activities

- Development of services:
 - We may use your Personal Data to develop and improve our recruitment processes. Where feasible, we use aggregated anonymous information in context of the development activities.
 - If you are hired, for populating your employee file and various systems and tools used in connection with employment at Sharpist. Upon hire, your Personal Data will be subject to the Sharpist Employment Privacy Policy in lieu of this Policy.
 - Legal and regulatory compliance, including obtaining and releasing Personal Data as required by law, judicial organizations or practice in order to comply with legal obligations imposed on us.

Sharpist processes your Personal Data pursuant to several legal bases, depending on the type of data and purpose of the processing. Under most circumstances, Sharpist's processing of your Personal Data in the recruitment context is based on your request in the anticipation of entering into an employment agreement with Sharpist. Sharpist will also process this information where required to comply with legal obligations to which it is subject, such as governmental reporting obligations. In some circumstances, Sharpist will process your Personal Data pursuant to its own legitimate interests in operating its business, including conducting the above described activities for internal administrative purposes and ensuring network and information security. A different legal basis may be provided at the point where Personal Data is collected.

4. How is Sensitive Information¹ treated?

Sharpist aims to limit the collection of Sensitive Information and shall only collect Sensitive Information if there is a legal justification for processing it, or if it is collected and processed with your expressed consent. Sharpist recognizes the additional need to protect Sensitive Information. All Sensitive Information is processed in strict compliance with applicable local law and only by a restricted number of individuals who have a clear and justified need to know such information. Sensitive Information may be processed where necessary to enable Sharpist to exercise its legal rights or perform its legal obligations in the field of employment law or related fields of law. Examples of such obligations include ensuring the health and safety of Sharpist's employees through the provision of a safe working environment or where the processing is carried out by a doctor or similar health professional bound by a duty of confidentiality to you and is necessary for medical purposes.

5. Which service provider do we use for our Application Management System?

For the processing of the Personal Data connected to your application, we use the Application Management System "Recruitee", a service of Recruitee BV (company under Dutch law, company number 63881829, Headquarters: Johan Huizingalaan 763A, 1066VH, Amsterdam). For this purpose, your Personal Data will be stored and processed on Recruitee servers in the Netherlands. Recruitee has been carefully selected and processes your personal information based on an order processing contract and attaches great importance to compliance with the applicable privacy policies.

6. Who has access to your data?

It is Sharpist's responsibility to implement appropriate access control measures to ensure that your Personal Data is only accessed by persons having a clear need to know such information. The extent to which your Personal Data is made accessible will depend upon the nature of the data concerned. Prior to hire, your Personal Data is not made widely available. Some Personal Data, such as your resume, job history, and other information relevant to assessing your fitness for the position to which you have applied, are made available as needed to the Sharpist team you are seeking to join, others within Sharpist with a stake in the applied for role, and appropriate members of the Sharpist Human Resources Department. Except as needed to assess your qualifications for the role, access to most of your Personal Data is restricted to certain experts (e.g. Human Resources, IT or Legal) to the extent necessary to perform their work tasks.

7. Transfer of your Personal Data

Sharpist will not sell, lease, rent or otherwise disclose your Personal Data except as provided in this section:

- Sharpist may share your Personal Data with authorized third parties who process Personal Data for Sharpist for the purposes described in this Policy or otherwise provide recruitment related services to Sharpist. In such cases Sharpist will ensure that there is a genuine need to transfer your Personal Data and that measures are in place to safeguard the processing of your Personal Data through authorized third parties.

Authorized third parties include, for example, recruitment agencies, professional advisors, external legal counsel, recruiting systems providers, providers of assessments and other third party suppliers.

Authorized third parties may technically have access to your Personal Data in the course of providing their services but will be contractually restricted (or subject to a professional or statutory duty of confidentiality) from processing your Personal Data for other purposes. Sharpist also requires them to act consistently with this Policy and to use appropriate security measures to protect your Personal Data.

- **Mandatory disclosures:** Sharpist may be required by or under mandatory law to disclose your Personal Data to certain authorities or other third parties, for example, to government agencies responsible for the employment activities, statistical information or to the police or other law enforcement agencies, for example in context of conducting a background check.
- **Mergers and acquisitions:** Where Sharpist takes steps to sell, buy, merge or otherwise reorganize its businesses in certain countries, this may involve disclosing Personal Data to prospective or actual purchasers and their advisers. In such circumstances, Sharpist will take all reasonable steps to ensure that appropriate measures to protect Personal Data are taken by such prospective or actual purchasers and their advisers.
- **Other:** Sharpist may disclose your personal data if it is necessary to protect your vital interests. Sharpist may also disclose and otherwise process your Personal Data in accordance with applicable law to defend Sharpist's legitimate interests, for example, in legal proceedings.

8. What steps are taken to safeguard Personal Data?

Privacy and security are key considerations for Sharpist. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering, training. We take appropriate steps to address online security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. Also, we limit access to our data bases containing Personal Data to authorized persons having a justified need to access such information.

9. Data quality

We take reasonable steps to keep the Personal Data we possess accurate and to delete incorrect or unnecessary Personal Data.

10. Your rights

With respect to the processing of your Personal Data, you will always have the rights as provided by applicable local law. In addition, this Policy provides you with the following rights:

- **Information:** You have the right to receive information about your personal data processed by Sharpist and to request access to your personal data and / or copies of this data. This includes information on the purpose of the use, the category of data used, its recipients and beneficiaries and, if possible, the planned duration of the data storage or, if that is not possible, the criteria for determining that duration.

- **Right to request correction and deletion:** Subject to applicable local law, you may be entitled to request Sharpist to rectify or delete your Personal Data that is incorrect, incomplete or unnecessary.
- **Right to object:** You may object to Sharpist’s processing of your Personal Data on compelling, legitimate grounds relating to your circumstances. Despite your objections, Sharpist may be required or permitted by law to process your Personal Data.
- **Right to restriction of processing:** You have the right to require Sharpist to restrict its processing of your Personal Data (1) if you contest the accuracy of the Personal Data, for the period enabling Sharpist to verify the accuracy of the Personal Data; (2) if Sharpist’s processing is unlawful; and (3) Sharpist no longer needs your Personal Data for the purposes of the processing, but you wish Sharpist to retain the data for the establishment, exercise, or defense of legal claims. During the restricted processing period, Sharpist will only process the Personal Data for storage purposes, with your consent, for the establishment, defense or exercise of legal claims, or other purposes permitted by law.
- **Right to withdraw consent:** Where the data processing is based on your consent, you may withdraw that consent at any time. Withdrawal of that consent will not affect the lawfulness of processing based on that consent prior to its withdrawal.
- **Right to lodge a complaint with a supervisory authority:** If you are located in a European Union member state or within the European Economic Area, you have the right to lodge a complaint about Sharpist’s data collection and processing actions with the supervisory authority concerned.

There will be no adverse consequences in you exercising your rights as mentioned above. In case you revoke your consent or object to certain processing activities or delete your profile completely, Sharpist may be unable to continue the recruitment process with you.

11. Whom to contact?

Sharpist GmbH is the controller of your Personal Data. If you have any queries about your Personal Data, contact primarily the relevant recruiting personnel through provided contacts or channels.

If you want to exercise your rights as described in the previous section of this Policy you may make a request in writing through provided contacts or channels.

Sharpist will fulfill your request within the timeframes required by applicable local law or, in the absence of such timeframes, within a reasonable time.

Sharpist GmbH has appointed Philipp Nordhus as contact person for Data Protection related questions. You may contact Philipp Nordhus if you have any queries concerning Privacy matters. Such queries and concerns may be made or reported in writing to the below address:

Sharpist GmbH
Schützenstraße 8
10117 Berlin
Germany
datenschutz@sharpist.com

12. Changes to this Policy

Sharpist may from time to time change this Policy or change, modify or withdraw access to this site at any time with or without notice. We recommend that you re-visit this Policy on our website from time to time to learn of any such changes to this Policy.

[1] “Sensitive Information” means special categories of Personal Data as defined under applicable laws that may be processed only when there is a legal justification (e.g. authorized by law in the field of employment) or with the individual’s consent. Such special categories include but are not limited to Personal Data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, or data which concerns their health or sex life or sexual orientation.