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# GLUE - CANDIDATES PRIVACY POLICY

This privacy policy was last updated on 25 April 2022.

## Introduction

We value data protection, and we do our best to protect your personal data.

In this privacy policy you will find information about how we handle your personal data when you engage with Glue about a job opportunity. You will find information about personal data we collect, why we need it, how we use it, and how you can control our use of your information.

This policy may change from time to time so please check this page to ensure that you are happy with any changes.

## 1. WHO WE ARE

- 1.1 Glue Home Limited is a limited liability company incorporated in England and Wales with company number 10428547 and registered office address at 7 Bell Yard, London, England, WC2A 2JR; and Glue AB is a Swedish limited liability company with registration number 556944-8102 and registered office at Humlegårdsgatan 22, 4fl, 114 46, Stockholm, Sweden (hereinafter jointly referred to as "**Glue**", or "**we**", "**our**").
- 1.2 Our business offers InHome technology, consisting of hardware and software products and services ("**Services**") through our website located at [www.gluehome.com](http://www.gluehome.com) ("**Website**"); our software application ("**Application**"); and third-parties' providers.
- 1.3 For the purpose of our processing of candidates' personal data, we are a Data Controller. We are registered as a Data Controller with the Information Commissioner's Office ("**ICO**") under number ZB304458.
- 1.4 Please be aware that we may share your personal data with third-party service providers as part of the recruiting process as detailed in clause 6 of this policy. As there may be other Data Controllers involved in the processing of your personal data, we recommend reading this policy to learn more about how your personal data may be processed by us and third parties.
- 1.5 If you have any queries regarding our use of your personal data, please do not hesitate to contact us at: [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com).

## 2. GENERAL

- 2.1 This Candidates Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, or that we obtain from other sources will be processed by us throughout our recruiting processes.
- 2.2 Our recruiting processes include you applying for a job with us using our Website, Application or third-parties service providers; you enquiring about an existing or potential position or other related opportunities within our company; us contacting you to discuss potential job opening or other collaboration opportunities.
- 2.3 The Candidates Privacy Policy regulates exclusively how we process candidate's personal data. To learn about our general data protection policies and procedures applying to users of Services or visitors to our Website and Application please visit: <https://en.gluehome.com/legal/integritetspolicy>
- 2.4 To learn more about your rights to privacy and data protection, we recommend visiting: ICO's website at <https://ico.org.uk/>; and IMY's website at <https://www.imy.se/en/>.

## 3. HOW WE USE YOUR PERSONAL DATA

- 3.1 We aim at minimising use of your personal data. However, in order to consider you for a potential or actual position within Glue, we have to process some of your personal information.
- 3.2 We generally process candidates' personal data on the basis of our legitimate interest to recruit candidates. We regularly assess the impact of our data processing to make sure that our legitimate interest does not override or harm your interests and rights.
- 3.3 We want you to be in control of your personal data, please do not hesitate to contact us at [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com) if you need more information or want to delete, update or modify your data.
- 3.4 The section below explains more in detail how and why we process your personal data, as well as the legal basis on which we carry out each type of processing.

TYPES OF PROCESSING	LEGAL BASIS
RECRUITMENT PROCESS: PRELIMINARY STAGE	LEGITIMATE INTEREST

We will process your personal data to assess your suitability for a current or future role within Glue	We have a legitimate interest as a business in reaching out to potential candidates for current or future roles within our companies. This includes, reaching out to; interacting with; and assessing potential candidates.
<b>RECRUITMENT PROCESS: STAGE 1</b>	<b>LEGITIMATE INTEREST &amp; CONSENT</b>
<p>Once we've assessed your general profile, we may invite you to have more structured conversations with our team to learn more about you. We may also request further information about your professional background, experience and supporting documentation. We may contact you to give you feedback on your application, interviews and to discuss other opportunities.</p>	<p>Whilst we rely on our legitimate interest as a business in recruiting candidates, we may request your express consent before moving you forward in our recruitment process. This is mainly to make sure that you are fully aware of our treatment of personal data as we do not control the extent of personal information you may want to share with us within the recruitment process. Depending on the types of information you decide to share with us, we may have a legal obligation to obtain your consent before carrying on with the recruitment process (e.g., if you share with us information regarding your religious beliefs or sexual orientation). Please read the following guidance to learn more about Special Category Data <a href="https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/">https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/</a></p>
<b>RECRUITMENT PROCESS: STAGE 2</b>	<b>LEGITIMATE INTEREST, PERFORMANCE OF A CONTRACT &amp; CONSENT</b>
If you are successfully selected for a role within Glue, we will send you a formal offer and we may negotiate with you the terms of your engagement. We will process your personal data in order to: prepare	<p>We have a legitimate interest as a business to process your personal data whilst negotiating and entering into a contract with you. We will also rely on the performance of a contract as a legal basis to collect and use your personal data to be able to enter into a</p>

<p>your employment contract or other type of contract; allow you to enter into a contract with us; and fulfil any pre-employment checks that we may deem necessary or that are required by applicable laws (e.g., we will have to check your eligibility to work in the UK). We may have to share some of your personal data with our advisors, affiliates, and third-parties service providers for the purpose of offering you an employment contract or other agreement (e.g. service agreement).</p>	<p>contract with you and to perform activities necessary at a precontractual level. Whenever we believe that our processing of your data may involve sensitive personal data, we will request your express consent.</p>
<b>ADMINISTRATIVE PURPOSES</b>	<b>LEGITIMATE INTEREST &amp; LEGAL REQUIREMENT</b>
<p>We will use your personal data to respond to your queries, requests and complaints.</p> <p>We may also keep a record of these communications to improve our services and make sure we can demonstrate compliance with Applicable Laws and Code of Conduct.</p>	<p>We have a legitimate interest as a business to interact with you whilst looking for potential candidates.</p> <p>We may collect and use your personal data to fulfil our contractual obligation to you, and our legal obligations as a company.</p>
<b>MARKETING</b>	<b>CONSENT &amp; LEGITIMATE INTEREST</b>
<p>If you have expressly opted in to receive marketing communications from us, we will use your personal data to share with you marketing communications in line with the preferences you have provided.</p> <p>We may contact you about similar services where you have used our Services and you have not opted-out of receiving this information.</p>	<p>We will collect and use your personal data provided that you consent to such use.</p> <p>In very limited circumstances, we may also process some of your personal data on the basis of our legitimate interest in providing our Services to you and the general public.</p>

<b>FRAUD PREVENTION</b>	<b>LEGITIMATE INTEREST</b>
We may use your personal data to minimise the risk of fraud and other illegal activities.	We will process some of your personal data on the basis of our legitimate interest to protect you, our business, and third parties from fraud and other illegal activities.
<b>GENERAL COMPLIANCE</b>	<b>LEGAL REQUIREMENT &amp; LEGITIMATE INTEREST</b>
<p>We may process some of your personal data to comply with our contractual or legal obligations.</p> <p>In particular, we may have to assist any public authority or criminal investigation body as required; to verify the accuracy of data we hold about you; and/or to comply with a request from you in connection with the exercise of your rights.</p>	<p>We may process your personal data to comply with any legal obligation deriving from Applicable Laws and Code of Conducts.</p> <p>We may retain and process some of your personal data on the basis of our legitimate interest to protect our business from legal liability.</p>

#### 4. **INFORMATION WE COLLECT ABOUT YOU**

- 4.1 In order to recruit potential candidates, we may need to collect some of your personal information. The chart below aims at clarifying what types of personal data we may need from you, depending on your interaction with us.

<b>TYPES OF PROCESSING</b>	<b>INFORMATION WE MAY COLLECT ABOUT YOU</b>
<b>RECRUITMENT PROCESS: PRELIMINARY STAGE</b>	<p>Title</p> <p>Name</p> <p>Address</p> <p>Emails</p> <p>Telephone Numbers</p> <p>Other Contact Details</p>

<b>RECRUITMENT PROCESS: STAGE 1</b>	<p>Evidence of how you meet the requirements of the job, (e.g., CVs, portfolios and references)</p> <p>Evidence of your right to work in the UK and immigration status</p> <p>A record of the correspondence regarding your interview process with Glue</p> <p>The status of your application and updates on how it moves forward</p>
<b>RECRUITMENT PROCESS: STAGE 2</b>	<p>Diversity and equal opportunities monitoring information (e.g., information about your race or ethnicity, religious beliefs, sexual orientation, neurodiversity and other <i>‘special category data’</i>)</p> <p>Information about your health, including any medical needs or conditions</p> <p>Other information required for some applications</p> <p>Copies of driving licence, passport, birth certificates and proof of current address, such as bank statements and council tax bills</p>
<b>ADMINISTRATIVE PURPOSES</b>	<p>Records of communications with candidates</p>
<b>FRAUD PREVENTION &amp; GENERAL COMPLIANCE</b>	<p>Records of communications with candidates</p>

## 5. OTHERS WHO MAY HAVE ACCESS TO YOUR DATA

### Our main service providers

- 5.1 We may disclose your information to our advisors, affiliates, and third-party service providers for the purposes of running our recruitment processes or for the purpose of general compliance and fraud prevention.
- 5.2 Our main third-parties service providers are the software platforms BambooHR (<https://www.bamboohr.com>) and LinkedIn (LinkedIn Corp, Delaware, 1000 WEST

MAUDE AVENUE, SUNNYVALE CA, 94085, SEC CIK #0001271024-  
[https://about.linkedin.com/?trk=content\\_footer-about](https://about.linkedin.com/?trk=content_footer-about)) that we use for recruitment's purposes. Both companies have their own independent policies and practices to ensure compliance with data protection legislation. Please do read the following policies to learn more respectively about LinkedIn and BambooHR's use of your personal data:

(a) <https://www.linkedin.com/legal/privacy-policy#use>

(b) <https://www.bamboohr.com/privacy-policy/>

- 5.3 Please be aware that if you use LinkedIn we will not be responsible or have any control on how LinkedIn uses your personal data, as LinkedIn is the data controller for what concern the treatment of your personal data through their platform.
- 5.4 BambooHR offers software-as-a-service for recruitment to us, and other customers and it has its own policies and procedures to ensure compliance with data protection. We are a data controller for what concern our use of your personal data through BambooHR's platform. In particular, we are responsible for the selection and use of your personal data throughout the recruiting process.
- 5.5 Third party service providers may also include cloud service providers; hosting, email and content providers; marketing agencies and administrative services providers.
- 5.6 With the exception of LinkedIn, we only disclose to third party service providers the selection of personal information that is necessary for them to provide their service and we have contracts in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.
- 5.7 Other ways we may share your personal information
- 5.8 We may share your personal information with a third party if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or our legal rights or to protect the rights, property or safety of our employees, agents, contractors, and customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.
- 5.9 Business Transfer
- 5.10 In the event that we sell or buy any business or assets, or if Glue or substantially all of its assets are acquired by a third party, we will disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws).
- 5.11 If you object to our sharing of your personal data in the context of a business transfer, we will not be able to continue the hiring process with you.



## 6. DATA TRANSFERS

- 6.1 As we are based both in the UK and in Sweden, we will store and process your data in both countries; and we may share your personal data within our group of companies.
- 6.2 Please note that some of our external third-party service providers are based outside the UK and Sweden so their processing of your personal data may involve a transfer of data outside of the UK and of the European Economic Area. In particular, please refer to LinkedIn's privacy policy for more details on how they protect your personal data in the context of international data transfers.
- 6.3 Whenever we transfer your personal data outside of the UK or Sweden, we ensure a similar degree of protection is afforded to it by running a risk assessment and ensuring at least one of the following safeguards is implemented:
- (a) We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
  - (b) Where we use certain service providers, we may use specific contracts approved for use in the UK or Sweden which give personal data the same protection it has in the UK and/or in Sweden; and/or
  - (c) In the absence of an adequacy decision, we may transfer your personal data to a non-EEA country, where we are satisfied that there are additional safeguarding measures in place to ensure an essentially equivalent level of protection for your data.
- 6.4 Please contact us at [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com) if you want further information on the specific mechanism used by us when transferring your personal data outside of the UK.

## 7. DATA RETENTION

- 7.1 Our general policy is to keep your personal data for as long as it is necessary to run our recruitment processes and retain our relationship with you as an employer or contractor. However, as specified below, in some cases we may have to keep your personal data for a longer period of time.
- 7.2 When you go beyond our preliminary stage of recruitment ("**Shortlisted Candidates**"), we may retain some of your personal data for a period of 2 (two) years after the last contact with you, if we believe you may be a good fit for future roles within Glue. We will always contact you to let you know that we are willing to keep your data for a longer period of time and you will always have an easy way to say no or simply change your mind.

- 7.3 Information relating to successful candidates will be transferred to their employment record within Glue. This will be limited to the information necessary for the working relationship and, where applicable, that required by law.
- 7.4 When you only entertain with us preliminary conversations (i.e., you did not get past the preliminary stage of our recruitment process), we will keep your personal data for six months from the communication of the outcome of the recruitment exercise or last written communication.
- 7.5 Whenever a candidate does not seem to fit the general requirements for any position within the company, her/his personal data will be erased after 4 months or less from the last communication with us.
- 7.6 Please note that in exceptional circumstances, we may need to retain some of the personal information you shared with us for 7 (seven) years from our latest interaction, even if you are not a Shortlisted Candidate. This will happen only if we have been advised that there is potential risk of future litigation in connection with our interactions with you.
8. **SECURITY**
- 8.1 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.
- 8.2 Although we are committed to protect your personal information, we cannot guarantee the security of any data transmitted from or to our Website or App. Any transmission or data sharing is at your own risk.
- 8.3 All information you provide to us is transmitted using TLS encryption, and it is stored on our secure servers behind firewalls.
- 8.4 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- 8.5 Please be aware that if you use third-party service providers such as LinkedIn, we will not have control over their security measures and procedures to protect personal data as they are an independent third-party company. Therefore, sharing personal data with such third-party providers is at your own risk.

## 9. YOUR RIGHTS

- 9.1 You have several rights in relation to your personal information under Data Protection Laws. As we are established both in the UK and Sweden, we are subject to the authority of both ICO (the UK data protection authority) and IMY (the Sweden data protection authority). However, as our recruitment main hub is based in the UK, we believe ICO will be best suited to solve any data protection issue that may arise from our processing of your personal data in the context of recruiting. Please be assured that we aim at always complying with the highest standard of data protection regulation.
- 9.2 In relation to certain rights, we may ask you for more information to confirm your identity and, where applicable, to help us search for your personal information.
- 9.3 Except in rare cases where additional time may be required, we will respond to you within one month from either (i) the date that we have confirmed your identity, or (ii) where we do not need to do this because we already have this information, from the date we received your request.

### *Accessing your personal information*

- 9.4 Under Data Protection Laws you have a legal right to ask to see a copy of the personal information that we hold about you. Such requests are called **subject access requests**.
- 9.5 If you would like to make a subject access request, please contact us at : [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com).
- 9.6 You will also need to provide one form of identification and proof of your address, for example, driving licence, utility bill, and if appropriate, any particulars about the source or location of the information you are requesting.
- 9.7 Further information about subject access requests can be found on the ICO's website <https://ico.org.uk> or on IMY's website <https://www.imy.se/en/>.
- 9.8 We may not provide you with a copy of your personal information if this concerns other individuals or if we have another lawful reason to withhold that information.

### *Correcting and updating your personal information*

- 9.9 The accuracy of your information is important to us, and we are working on ways to make it easier for you to review and correct the information that we hold about you.

- 9.10 In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us at : [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com).

#### *Withdrawing your consent*

- 9.11 Where we rely on your consent as the legal basis for processing your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy.
- 9.12 If you would like to withdraw your consent, you can do so by writing to us at: [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com) or calling us using the contact details at the end of this policy.
- 9.13 If you have provided consent for your details to be shared with a third party, and wish to withdraw this consent, please also contact the relevant third party to amend your preferences.

#### *Objecting to our use of your personal information*

- 9.14 Where we rely on our legitimate business interests as the legal basis for processing your personal information for any purpose(s), you may object to us using your personal information for these purposes by writing to us at: [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com). Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.

#### *Erasing your personal information or restricting its processing*

- 9.15 You may ask for your personal information to be removed from our systems by emailing or writing to us at: [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com). Unless there is a legal reason that allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.
- 9.16 You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

#### *Transferring your personal information in a structured data file ('data portability')*

- 9.17 Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with a contract we have entered into with you, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form.
- 9.18 You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

*Complaining to the UK or Swedish data protection regulator*

- 9.19 We would like to be able to resolve all your concerns, and we hope that we can do so. Where we haven't been able to do this, you have the right to complain to the ICO or IMY if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details: <https://ico.org.uk> or IMY's website <https://www.imy.se/en/>.

**10. CHANGES TO THIS POLICY**

- 10.1 We may review this policy from time to time and any changes will be notified to you by posting an updated version on our Website.

**11. CONTACT US**

- 11.1 Please contact us for any questions, comments, and requests regarding this privacy policy.
- 11.2 Our email address for data protection queries is: [peopleteam@gluehome.com](mailto:peopleteam@gluehome.com)



## Schedule 1 DEFINITIONS

KEY DEFINITIONS	
Applicable Laws	<p>Applicable Laws means:</p> <p>any law, statute, regulation, or subordinate legislation in force from time to time to which a party is subject and/or in any jurisdiction that the services are provided to or in respect of;</p> <p>the common law and laws of equity as applicable to the parties from time to time;</p> <p>any binding court order, judgement or decree;</p> <p>any applicable guidance, guidelines or codes of practice issued by any relevant Data Protection Supervisory Authority (in each case whether or not legally binding);</p> <p>any applicable industry code, policy or standard (in each case whether or not legally binding); and</p> <p>any applicable direction, policy, rule or order that is binding on a party and that is made or given by any regulatory body having jurisdiction over a party or any of that party's assets, resources or business;</p>

<b>Data Protection Laws</b>	<p>Data Protection Laws means all Applicable Law relating to the processing, privacy, and/or use of Personal Data, including:</p> <p>the UK GDPR;</p> <p>the UK Data Protection Act 2018;</p> <p>the EU GDPR Regulation (EU) 2016/679;</p> <p>any laws which implement any such laws; and</p> <p>any laws which replace, extend, re-enact, consolidate or amend any of the foregoing (whether or not before or after the date of this Agreement).</p>
<b>Data Protection Supervisory Authority</b>	<p>Means any local, national or multinational agency, department, official, parliament, public or statutory person or any government or professional body, regulatory or supervisory authority, board or other body responsible for administering Data Protection Laws.</p>
<b>Data Controller</b>	<p>Data Controller means the individual or organisation that, alone or jointly with others, exercises overall control over how Personal Data is processed and the purposes of such treatment.</p>
<b>Data Processor</b>	<p>Data Processor means any person (other than an employee of the data controller) who processes the data on behalf and under the instruction of the Data Controller.</p>
<b>Lead Supervisory Authority</b>	<p>In the GDPR, the general rule is that the supervision of cross-border processing activity, or involving citizens of more than one EU country, is led by only one supervisory authority, called the Lead supervisory authority. This is known as the One Stop Shop principle. A lead supervisory authority is the body with the primary responsibility for dealing with a cross-border processing</p>



	<p>activity (e.g., when a company carrying out processing activity in several Member States is being investigated). The supervisory authority of the country where the main establishment of the organisation is based will be the lead authority.</p> <p>Where an organisation has a single establishment in the EU, but the processing substantially affects or is likely to substantially affect data subjects in more than one Member State, the lead supervisory authority is the supervisory authority of the place of that single establishment.</p> <p>Where an organisation has several establishments in the EU, the principle is that the main establishment is the place of the central administration of that organisation. However, if another establishment takes the decisions about the purposes and means of the processing - and has the power to have such decisions implemented - then that becomes the main establishment.</p> <p>The lead supervisory authority mechanism is only applicable in the context of a company's cross-border processing activities. Consequently, companies must assess whether they meet one of the following criteria where either:</p> <ul style="list-style-type: none"> <li>• processing takes place in the context of the activities of businesses or organisations in more than one member state where the business or organisation is established in more than one member state; or</li> <li>• processing takes place in the context of the activities of a single establishment but substantially affects or is likely to substantially affect individuals across more than one member state.</li> </ul> <p>Please note that ICO cannot be a Lead Supervisory Authority as the UK is not part of the European Union.</p>
<b>Personal Data</b>	<p>Personal data is defined in the UK GDPR as any information relating to an identified or identifiable natural person. It can include obvious data like your name but also identification numbers, online identifiers</p>

	and/or one or more factors specific to the physical, physiological, genetic, economic, cultural or social identity of that person.
<b>Special Category of Data</b>	Special category data includes any data revealing race or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.