



JOB APPLICANT AND SUCCESSFUL CANDIDATE PRIVACY NOTICE

Effective as of August 24, 2022. Edpuzzle Inc. (“Edpuzzle”), and its subsidiaries (collectively, the “Edpuzzle Group,” or “we,” “us” or “our”) collect and process personal data relating to employment candidates as part of our recruitment process subject to this Job Applicant and Successful Candidate Privacy Notice (the “Notice”). This Notice may be updated from time to time to reflect changing legal, regulatory or operational requirements. We encourage you to periodically review this page for the latest information on our privacy practices.

1. About this Notice

At Edpuzzle we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Notice applies to all employment candidates of Edpuzzle and its affiliated companies, and describes the personal information that Edpuzzle collects from or about you, and how we use and to whom we may disclose that information. It is important that you read all of this Notice carefully.

- The term “**Job Applicant**” is used in this Notice to refer to anyone who applies for a job role, who applies for the relevant talent pool, who is considered for a role or for a relevant talent pool or who otherwise seeks to work with or for us (whether on a permanent or non-permanent basis).
- “**Successful Candidate**” shall mean a Candidate who has passed all stages of our interview process and has received an offer letter from us.

We have appointed a Data Protection Officer (DPO) to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal information, please contact our DPO, at the following address and contact details:

Av. Pau Casals, 16, Pral. 1-A
08021 Barcelona, Spain
privacy@edpuzzle.com

For data deletion, update or correction requests please reach out to hr@edpuzzle.com, as outlined in Section 8 “How long does Edpuzzle keep my personal information?” below.

2. Compliance with Privacy Laws and Regulations



In collecting and processing your personal information, we will comply with the data protection laws and regulations in force at the time. This requires that the personal information we hold about you must 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 a 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 for as long as necessary for the purposes we have told you about; and
- kept securely.

3. What personal information does Edpuzzle collect about you?

We collect and maintain different types of personal information in respect of those individuals who seek to be employed by us. The information we collect from you helps us manage your recruiting and hiring process, conduct Edpuzzle's business, and comply with Edpuzzle's legal obligations.

We collect and use the following categories of personal data from and about our candidates (some or all may apply to you):

- Identification data
- Contact information
- Place of birth/Nationality
- Address
- Gender
- Marital status
- Age
- Data regarding screening questions
- Previous employment information
- Education history
- Referee contacts
- Data pertaining to work preferences and abilities
- Resume data
- Job interview notes
- Assessment results

We never store or process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation.



4. How does Edpuzzle use the information?

Edpuzzle will only use and otherwise process personal information as follows:

- of Job Applicants for recruiting and job placement purposes, such as, but not limited to, including Job Applicants in a database to notify them of future job opportunities; and
- of Successful Candidates for on-boarding purposes and background screening, including enrollment in payroll and applicable employee benefit schemes, preparation of employment contract, and other administrative purposes necessary for the Successful Candidate to commence employment with Edpuzzle.

Edpuzzle's uses and processes your personal information as per the following legal bases:

- legitimate interests, including those described above, as processing your personal information is necessary to carry out the hiring process and to make it possible for Job Applicants and Successful Candidates to apply for and/or be appointed to a position at Edpuzzle;
- compliance with Edpuzzle's legal obligations, such as accounting and tax requirements;
- the performance of the pre-employment (e.g., offer letter) and/or employment contract between Edpuzzle and Successful Candidates;
- for the purposes of carrying out the obligations and exercising rights under applicable employment laws and regulations;
- where applicable, Job Applicants or Successful Candidates, may subsequently object to the processing of their personal data at any time by reaching out to us at hr@edpuzzle.com, without affecting the lawfulness of processing before its withdrawal.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. In case we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. Where does Edpuzzle obtain the information?

Much of the information we hold will have been provided by you, but some may be created in the course of the application process (for example, during an interview). Additionally, we may collect certain types of personal data about you from third parties, including, but not limited to, recruitment agencies or social media platforms (e.g., LinkedIn).

6. Will Edpuzzle share my personal information?



We may share your personal information with our employees, contractors, consultants, employer-of-record and other parties who require such information to assist us with the purposes outlined in previous sections. We may share personal information with such parties both in and outside of your home jurisdiction, and as result, your personal information may be collected, used, processed, stored or disclosed in a third country.

A list of our third-party providers is attached below:

- [Lever](#) for job applications management and recruitment.
- [HelloSign](#) for handling electronic signatures of offer letters and employment contracts.
- [Asana](#) for handling the Hiring and Onboarding Process.
- [EOR New Horizons](#) for handling the Hiring Process.
- [EOR Remote](#) for handling the Hiring Process.

This list may change over time, and we'll work hard to keep it up-to-date. Disclosure of your personal information to additional third parties or use of it for different purposes than those indicated in this Notice shall only be done after notifying you all necessary information on any key elements affecting the processing of your personal data. You will then have the right to exercise an 'opt out' choice if your personal information is about to be used and/or disclosed in a way that you believe is not consistent with this Notice.

7. How are transfers of personal information to third countries secured?

7.1. European Economic Area

As part of a global organization, Edpuzzle operates both within and outside the European Economic Area ("EEA") and from time to time we may transfer your data for processing in a territory outside the EEA that does not have the same statutory levels of data protection. When we do so: (A) the [Standard Contractual Clauses \("SCC"\)](#) approved by the European Commission; or (B) the applicable standard data protection clauses adopted pursuant to Article 46(2)(c) or (d) of the UK GDPR; or (C) the standard data protection clauses issued, approved or recognized by the Swiss Federal Data Protection and Information Commissioner, as applicable according to your location, shall rule the transfer of data in order to ensure that your information is made subject to adequate levels of protection.

We maintain appropriate technical and organizational measures to protect the confidentiality of your personal information, including security measures to protect against unlawful or unauthorized processing of personal information, and against the accidental loss of, or damage to, your personal data.



7.2. Transfers to the United States of America

Edpuzzle is headquartered and hosted in the United States, as well as most of our service providers. Hence, personal data we collect from you may be transferred to and processed in the United States.

The United States has not sought, nor received, a finding of “adequacy” from the European Union under Article 45 of the GDPR, and the Court of Justice of the European Union (CJEU) declared in its [July 2020 Schrems II judgment](#) the European Commission’s Privacy Shield Decision invalid on account of invasive U.S. surveillance programs, making data transfers under the Privacy Shield Framework unlawful.

Edpuzzle relies on derogations for specific situations under Article 49 of the GDPR for performing transfers of data to the United States. In particular, Edpuzzle will collect and transfer to the United States Job Applicant and/or Successful Candidate personal data, with your explicit consent, to perform a contract with you, and/or for reasons of public interest. The latter will apply in those instances where data is processed and logged for the purpose of protecting our community and other users’ personal information from unauthorized access, disclosure and/or manipulation (e.g., advanced attacks).

If your personal data is transferred outside the EU to other Edpuzzle affiliates or to third party service providers in the United States, we will take steps to ensure application of suitable safeguards to protect the privacy and security of your information, and to use it only in consistency with your relationship with Edpuzzle. Please note, however, that the level of data protection in the United States is not equivalent to that in the EU. In particular, it is possible for United States government agencies to access your personal data based on statutory authorizations without you knowing about this. Additionally, there are no comparable options for legal enforcement of your rights in the United States.

Remember, your information is under your control and you may elect to stop using our Services at any time, and at your discretion. See section Edpuzzle Privacy Principles, item “What are my rights when using Edpuzzle?” for further detail on the rights that assist you.

8. How long does Edpuzzle keep my personal information?

If your application for employment is successful and you commence employment with Edpuzzle, your personal data will be maintained consistent with Edpuzzle’s employee data retention policies.

If you apply for a job at Edpuzzle and your application is unsuccessful (or you withdraw from the process or decline our offer), Edpuzzle will retain your information for five (5) years after your



application. We retain this information for various reasons, including in case we face a legal challenge in respect of a recruitment decision, to consider you for other current or future vacancies at Edpuzzle and to help us better understand, analyze and improve our recruitment processes.

If you do not want us to retain your information for consideration for other roles, or want us to update it, please contact hr@edpuzzle.com. Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

9. What are my rights in respect of my personal information?

Your rights relating to your personal information include:

- to be informed about how Edpuzzle uses your personal information;
- to request access to personal information held by Edpuzzle, and to have any incorrect, inaccurate or incomplete personal information rectified;
- where appropriate, to restrict processing concerning you or to object to processing;
- to have personal information erased where there is no compelling reason for its continued processing; and
- where applicable, to portability of personal data, that is to say, to receive your personal information in a structured and commonly used format.

If you wish to exercise a right of access please contact hr@edpuzzle.com. We will respond to any requests in accordance with applicable law, and so there may be circumstances where we are not able to meet your request.