



## **JOB APPLICANT AND SUCCESSFUL CANDIDATE PRIVACY NOTICE**

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**Document Control**

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Privacy Notice

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## 1. OVERVIEW

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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 (“Privacy Notice” or “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 Notice for the latest information on our privacy practices.

**If you are a United States (“U.S.”) resident, this Notice is supplemented by Section 10 “Additional Privacy Disclosures for U.S. Residents,” as applicable.**

## 2. ABOUT THIS NOTICE

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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](mailto:privacy@edpuzzle.com)

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

### 3. COMPLIANCE WITH PRIVACY LAWS AND REGULATIONS

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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.

### 4. WHAT PERSONAL INFORMATION DOES EDPUZZLE COLLECT ABOUT YOU?

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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 (e.g., full name);
- 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 data relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation.

Job positions that have direct contact with children or that are aimed at children will be required to provide, prior to joining Edpuzzle, a criminal background check related to children-related sex offenses as per applicable legislation.

## 5. HOW DOES EDPUZZLE USE THE INFORMATION COLLECTED?

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

- **Job Applicant information:** 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.
- **Successful Candidates information:** 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 uses and processes your personal information as per the following legal bases:

- Processing is necessary for the purposes of Edpuzzle's 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;
- Processing is necessary to comply with Edpuzzle's legal obligations (such as accounting and tax requirements);
- Processing is necessary to take steps at your request prior to entering into an employment contract (e.g. such as drafting an offer letter) and/or perform the employment contract between you and Edpuzzle; and/or
- 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](mailto:hr@edpuzzle.com), without affecting the lawfulness of processing prior to such objection.



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.

## **6. WHERE DOES EDPUZZLE OBTAIN THE INFORMATION?**

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Much of the information we hold has been provided by you, but some may be created in the course of the application process (e.g., 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).

## **7. WILL EDPUZZLE SHARE MY PERSONAL INFORMATION?**

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We may share your personal information with our employees (limited to those who need to know the data for the purposes described in this Privacy Notice), 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. Lever is our Applicant Tracking System (ATS).
- [HelloSign](#) / [Adobe](#) 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.
- [Calendly](#) to schedule calls and meetings
- [Google](#) for communication (such as audio and video conferencing through Google Meet), document collaboration, and other work-related activities.



When we disclose your personal information to these third parties, we will ensure they use your personal information in accordance with our instructions, and we will not authorize them to use or disclose your personal information except as necessary to perform services on our behalf or to comply with applicable legal obligations.

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.

ATS Integrations: Our ATS provides us with the capability to seamlessly integrate with various employment platforms, thus enabling us to share our job posts on those platforms. It is important to be aware that if you choose to apply for a position through any of these platforms, your data will ultimately be stored within our ATS.

## **8. HOW ARE TRANSFERS OF PERSONAL INFORMATION TO THIRD COUNTRIES SECURED?**

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### **8.1 Transfers of personal data outside of the European Union, European Economic Area, United Kingdom and/or Switzerland**

As part of a global organization, Edpuzzle operates both within and outside the European Union ("E.U.") and from time to time we may transfer your data for processing in a territory outside the European Economic Area ("E.E.A.") that does not have the same statutory levels of data protection. When we do so, and except for transfers to the U.S., as explained below, the transfer will only take place:

- a. to countries that the European Commission considers, through an "adequacy decision", have an adequate level of protection;
- b. when we provide any of the appropriate safeguards listed under art. 46.2 of Europe's G.D.P.R; or
- c. in the absence of "a" or "b" above , we may still transfer your personal information outside of the E.U. / E.E.A. based on any of the derogations (also known as exceptions) for specific situations described under art. 49 of Europe's G.D.P.R..

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.



## **8.2. Transfers to the United States**

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

As of the date this Notice has been updated, Edpuzzle will rely on the derogations for specific situations under Article 49 of the G.D.P.R. to transfer your personal information to the United States, in particular:

- a. your explicit consent;
- b. to perform the employment contract we have entered into with you; and/or
- c. to conclude or perform a contract in your interest with a third party.

When your personal data is transferred outside your jurisdiction to other Edpuzzle affiliates or to third party service providers located in the U.S., 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 and this Privacy Notice.

Please note, however, that the level of data protection in the United States may not be equivalent to that in your jurisdiction. In particular, it is possible for U.S. government agencies to access, without your knowledge, your personal data based on statutory authorizations. Additionally, as an E.U. / United Kingdom / Swiss citizen, in the U.S. you may not have comparable legal enforcement options of your data protection rights as those in your jurisdiction.

Remember, your information is under your control and you may elect to stop our processing of your information at any time, and at your discretion. See section [“What are my rights in respect of my personal information?”](#) for further detail on the rights that assist you.

## **9. HOW LONG DOES EDPUZZLE KEEP MY PERSONAL INFORMATION?**

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

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](mailto: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.

## 10. WHAT ARE MY RIGHTS IN RESPECT OF MY PERSONAL INFORMATION?

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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 your rights regarding personal data please contact [hr@edpuzzle.com](mailto: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. Alternatively, you may contact Edpuzzle's DPO at the address specified above in section [About this Notice](#).

## 11. ADDITIONAL PRIVACY DISCLOSURES FOR U.S. RESIDENTS

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### **11.1. California residents - Notice at collection**

This Notice at Collection ("Notice at Collection") for California Residents supplements Edpuzzle's Job Applicant and Successful Candidate Privacy Notice and applies to you as a job applicant or successful candidate who resides in the State of California.

Edpuzzle adopts this Notice at Collection to comply with the California Consumer Privacy Act of 2018 (CCPA), as revised by the California Privacy Rights Act (CPRA).

#### **Personal Information Collected**

Please refer to the section "[WHAT PERSONAL INFORMATION DOES EDPUZZLE COLLECT ABOUT YOU?](#)" for information on the categories of personal data we may collect, store, and process about you.



### **Sensitive Personal Information Collected**

The following Information about you, listed as Sensitive Personal Information in the CCPA, may be collected, stored and processed: social security number, driver's license, state Identification card, and/or passport number.

### **Purpose/s and use of personal information and sensitive personal information**

Please refer to Section "[HOW DOES EDPUZZLE USE THE INFORMATION?](#)" in this Notice for information on purposes for which the personal information and sensitive personal information is processed.

### **Data Sharing**

Please refer to Section "[WILL EDPUZZLE SHARE MY PERSONAL INFORMATION?](#)" in this Privacy Notice.

### **Right to Know (Access), Right to Delete and Right to Correct**

To exercise the Right to Know (Access), Right to Delete and Right to Correct granted to you by the CCPA, please contact Edpuzzle's Data Protection Officer at the address specified above in section [About this Notice](#). Please note that we may request additional information to verify your identity.

### **Right to Opt-out of Sale**

We do not sell personal information from job applicants or successful candidates.