



## PRIVACY NOTICE FOR JOB APPLICANTS

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ALTIUM LTD. AND ASSOCIATED ENTITIES

Confidential  
Business Information

# PRIVACY NOTICE FOR JOB APPLICANTS

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## 1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

At Altium, we take the protection of your personal data very seriously. **Altium Ltd. and associated entities** (“Altium”, “we”, or “us”) is a «data controller». This means that we are responsible for deciding how we hold and use personal information about you. You are being provided a copy of this privacy notice because you are applying for work with us (whether as an employee or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. We are required under data protection legislation to notify you of the information contained in this Policy.

## 2. WHICH MAIN DATA PROTECTION PRINCIPLES DO WE COMPLY WITH?

We will comply with applicable data protection law. This says that the personal data we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have explained to you and not used in any way that is incompatible with those purposes.
3. Adequate, relevant and not excessive in light of the purposes that we have told you about.
4. Accurate, complete and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## 3. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS ABOUT YOU?

In connection with your application for work with us, we will collect, store, and use the information you have provided to us in your application form, including the curriculum vitae, covering letter as well as certification and working references. We will process also any information you provide to us during an interview.

In particular, we may collect and process the following categories of personal data about you:

- Identification Data (such as name, title, date of birth, gender, place of birth);
- Contact details (such as home address, e-mail addresses, telephone number);
- Family and social details (such as marital status);
- Education and training details (such as educational and vocational training);
- Employment details (such as employment history, performance ratings, , contract length, annual leave and sick leave details); and
- Financial details (such as salary information, benefit information).

Where required by local laws, or in connection with specific roles, we may collect and process special categories of personal data about you. Such special categories of personal data include racial or ethnic origin, religious beliefs, information about your health and information about criminal convictions and offences, in particular we may request a certificate of good conduct. These special categories of personal data will be processed to meet our legal responsibilities, or, where necessary, for personnel management and administration. Where required by local law we will obtain your explicit consent to process special categories of your personal data.

## 4. HOW IS YOUR PERSONAL DATA COLLECTED?

We may receive this personal data directly from you, for example if you apply for a job with us via your job application form and through new joiner forms completed when joining Altium. We may also receive this information from third parties, such as recruiters or your named referees.

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## 5. HOW WILL WE PROCESS PERSONAL DATA ABOUT YOU?

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

- Assess your skills, qualifications, and suitability for the vacant position;
- Carry out reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our hiring processes; and
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the vacant position since it would be beneficial to our business to appoint someone to that vacant position. We also need to process your personal information to decide whether to enter into an employment relationship with you.

### **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a reference for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## 6. HOW DO WE PROCESS SPECIAL CATEGORIES OF PERSONAL DATA?

We will use your particularly sensitive personal information in the following way:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

## 7. HOW DO WE DISCLOSE YOUR PERSONAL DATA TO THIRD PARTIES?

For the purposes of processing your application we may need to transfer or disclose your personal information to other companies within the Altium group or third party service providers that provide services to us in connection with your recruiting, e.g. consultancies. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Altium will further only disclose your personal data to other data controllers only if necessary and permitted by applicable law. Altium may disclose your information to third parties when obligated or permitted to do so by law and in order to investigate, prevent, or take action regarding suspected, or actual unlawful activities, including but not limited to fraud and situations involving potential threats to the physical safety of any person, to authorities or law enforcement agencies to comply with legal obligations (e.g. tax authorities) or to support internal or external audits, to organizations that provide and administer benefits and payroll services, and to establish or exercise our legal rights or to defend the rights, property, or safety of our organization or others.

## 8. DO WE TRANSFER YOUR PERSONAL DATA TO COUNTRIES OUTSIDE THE EU/EEA?

Some of the recipients of your personal data listed above may be located in countries outside the EU/EEA that the EU/EEA has determined do not offer an adequate level of protection with regard to personal data or where there is no adequacy decision by the European Commission. In that case Altium will ensure an adequate level of data protection by appropriate safeguards, e.g. EU Standard Contractual Clauses or BCR certification. If you would like to obtain a copy of the safeguard that Altium uses, please contact us at [data.compliance@altium.com](mailto:data.compliance@altium.com).

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## 9. HOW LONG WILL ALTIUM PROCESS YOUR PERSONAL DATA FOR?

We will retain your personal information for a period of twelve months after we have communicated to you our decision about whether to appoint you to the vacant position. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## 10. WHAT ARE YOUR RIGHTS AND DUTIES?

### 10.1. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate, complete and current. Please keep us informed if your personal data changes during your application process with us.

### 10.2. Your rights in connection with personal data

You have a number of rights regarding the processing of your personal data by Altium, if the statutory requirements are fulfilled. You may

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request rectification** of your personal data. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request to receive your personal data in a structured, commonly used and machine-readable format.**
- **Withdraw any consent with future effect.** Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legal justification for doing so.
- You also have the right not to be subject to a decision based solely on automated processing, including profiling.
- Further, you may submit a complaint to the responsible data protection supervisory authority, if you believe that we cannot sufficiently help you.

## 11. HOW CAN YOU CONTACT US OR THE DATA PROTECTION OFFICER FOR FURTHER QUESTIONS?

If you have any questions about this Policy, you can contact Altium at [data.compliance@altium.com](mailto:data.compliance@altium.com).