

Candidate Privacy Notice
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1. Introduction

Principal33 SRL, headquartered in Brasov, 13A Garii Blvd., Nine Building, 3rd floor, Brasov County, with sole registration code 42574513 and Romanian Trade Register no. J8/2455/2021 (hereinafter referred to including as "we" or "us" or "Principal33") complies with the legal provisions in force, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, GDPR) and relevant Romanian legislation.

This Candidate Privacy Notice explains how Principal33 collects, uses, and protects your Personal Data.

2. Definitions

- "Candidate" means any prospective employee, individual contractor or other applicant of Principal33.
- "Employee" means any current or former employees, individual contractors or other members of personnel of Principal33.
- "External Individual" means any person who interacts with or provides goods or services to Principal33, including but not limited to service providers, vendors, clients, consultants and other business partners.
- "Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as name, identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- "Sensitive Personal Data or Sensitive Data" means Personal Data, which if lost, compromised or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience or unfairness to an individual. Examples of Sensitive Personal Data may include social security numbers, driver's license numbers, passwords, passports, tax IDs, financial account and credit card numbers, health information (including Protected Health Information (PHI)), biometric identifiers, racial or ethnic origin and information about political opinions, religious beliefs, trade union membership, criminal history, sexual orientation or blood group. If applicable, Sensitive Personal Data will be processed in strict compliance with applicable legal requirements, and additional safeguards will be implemented to protect this data
- "Process/Processed/Processing" means any operation or series of operations performed on Personal Data or sets of Personal Data, whether automated or not, including collecting, recording, storing, deleting, viewing, accessing, amending, using, or disclosing the Personal Data.

Please note that when terms such as "include," "including," "for example," or "such as" are used in this Notice, they are intended as examples and not exhaustive lists. Any personal data will be processed in strict compliance with all legal and ethical requirements, and consent will always be obtained when necessary.

Our website www.principal33.com ("website") and the recruitment process are not intended for minors under the age of 16.

3. Purpose

This Candidate Privacy Notice ("Notice") outlines how Personal Data of candidates is collected, managed, and processed by Principal33. Principal33 is committed to handling the Personal Data of its candidates in an appropriate and lawful manner. Principal33 ensures that the processing of Personal Data is carried out in compliance with the General Data Protection Regulation (GDPR) and relevant Romanian legislation, including Law no. 190/2018. This Notice sets out the minimum requirements for ensuring that the Personal Data of candidates is collected, used, retained, and disclosed in a secure and compliant manner.

This Notice applies to you, as a Candidate who has made an employment-related inquiry, expressed interest in a position, or submitted your Personal Data, resume, or job application to Principal33. It covers all stages of the recruitment process, from initial inquiry to final decision.

4. How We Collect and Use Your Personal Data

Principal33 will collect Personal Data relating to candidates only to the extent necessary and for specific purposes related to the recruitment and selection process. In line with the GDPR principle of data minimization, Principal33 ensures that only relevant data required for evaluating your candidacy will be collected and processed.

Where consent is required for the processing of special categories of Personal Data (e.g., health data), explicit consent will be obtained and the processing will be carried out in accordance with applicable legal requirements.

Principal33 may also process certain candidates' Personal Data through authorized productivity tools and AI-assisted functionalities made available within its corporate Microsoft 365 environment, for limited internal recruitment-related purposes, such as summarising interview notes, structuring recruitment-related information and preparing draft internal materials. Such tools are used only subject to internal policies, approved use cases, applicable access rights and meaningful human review, and are not used as the sole basis for recruitment decisions.

Personal Data – During the recruitment process, we may collect or Process information from you in connection with your application. Information we collect includes:

- Name, address, telephone number, email address and other contact information
- Information you submit in resumes/CV's/letters, including but not limited to employment history, academic qualifications, professional qualifications, and skills
- Whether or not you were previously employed by Principal33, including employee ID
- Other relevant information, such as employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships, professional and other work-related licenses, permits and certifications
- Information generated by interviewers and recruiters, based on their interactions with you, e.g., via a recruitment hiring event or basic Internet searches. This may include interview notes, assessment results, and feedback directly related to your candidacy.
- Information provided by third-party recruiters, staffing companies or executive search agencies, where applicable
- Recommendations provided on your behalf by others
- Documentation required under immigration laws
- Personal Data submitted or generated as a result of psychological, technical or behavioral assessments undertaken (including the involvement of remote video proctoring); you will receive more information about the nature of such assessments before your participation in any of them
- Personal Data submitted or generated as a result of live video interviews; you will receive more information about the nature of such interviews before your participation in them

- Your Public LinkedIn profile
- Username and password, which are encrypted and securely stored, if applicable

Should you be successful for a role, we would then ask you to provide information about third parties, such as references or contacts that you provide to us. You are responsible for ensuring that you have permission to submit any such information and that such individuals are aware that their information will be available to Principal33 or its clients for the purposes of taking up references.

5. Sensitive Personal Data

Sensitive Personal Data is not required during the initial stages of the recruitment process, except where legally required (e.g., for equal opportunities monitoring or background checks). Nonetheless, should you be successful for a role, we - where permitted by applicable law - may then ask you to provide some Sensitive Personal Data and/or identification numbers to enable us to comply with legal requirements at a national level (e.g., in relation to equal opportunities legislation).

In addition, you may also be subject to a background checks. Background checks will be conducted only where strictly necessary for the role and in compliance with local legal requirements. Prior consent will always be obtained. The content of background check information may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases.

Otherwise, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, except where such information is legally required.

Aggregated information – This is information that is aggregated and therefore not uniquely personal to you, but which refers to selected population or geographic characteristics, age, gender, occupation, preferences, and interests in accordance with applicable laws.

Behavioral information – We and our service provider use “cookies” and similar technologies on the website. For more information and to manage your settings, please see the Cookie Policy and the Principal33 Privacy Statement

Any information you submit must be true, complete and not misleading. Submitting inaccurate, incomplete or misleading information may make you ineligible for employment.

6. Source of personal data

We may collect information about you directly from you or from other sources (where permissible and in accordance with applicable law):

- From you directly or from your use of the website
- From referrers, referees, and former employers
- From conversations with recruiters and other Principal33 associates or representatives, as well as from internet searches that these individuals may perform, or data that they may obtain from job search or professional networking websites (e.g., LinkedIn, etc) where you may have made data about yourself publicly available
- From third party recruiters, staffing companies or executive search agencies that are contracted by Principal33
- From background checks, as applicable. Where permitted by law, we may contract with a third party to perform a pre-employment background screening. You will receive more information about the nature of such a background check before it begins and no such checks will be undertaken without your express prior consent, where this is required by applicable law.

7. Purposes and Lawful Basis of your Personal Data

We will process your Personal Data (including, without limitation and where permitted, your Sensitive Personal Data) for our business purposes, including our recruitment, management and planning purposes, including:

- assessing your suitability for the role for which you are applying as well as future roles that may come available
- management and administration of your application
- facilitate communication, responding to your queries
- verifying eligibility to work
- perform data analytics, including of our candidate pool, to improve our recruitment process and the Website
- notifying you about opportunities (if you signed up)
- to comply with or monitor compliance with applicable law

We may collect and aggregate data from your Personal Data to enable us to monitor and improve our services.

An extensive list of the purposes for which we are collecting your Personal Data is set out in the table below. Where Principal33 wishes to use Personal Data for a new purpose that has not been communicated to the Candidate, and where required by law, Principal33 will notify the Candidate of the new purpose and, where necessary, obtain additional consent.

8. Legal Basis for Processing.

Principal33 processes Personal Data related to Candidates when required by law, necessary for the performance or administration of the recruitment process or based on a legitimate business interest. In accordance with Article 6 of the GDPR, the processing of Personal Data is carried out under one or more legal grounds: performance of a contract, legal obligation, legitimate interest, or explicit consent where applicable.

When it is necessary to process Sensitive Personal Data, this will only be done to fulfill legal obligations or exercise specific rights related to your candidacy, in line with Article 9 of the GDPR.

Where consent is required by law for processing your Personal Data, Principal33 will obtain it in a manner that is clear, specific, and informed, in compliance with GDPR. Candidates have the right to withdraw their consent at any time by contacting us at dataprotection@principal33.com.

Please note that the withdrawal of consent does not affect the lawfulness of any processing based on consent before its withdrawal. Principal33 may continue to process Personal Data if other lawful grounds exist for doing so.

8.1. The primary legal basis is set out in the table below:

PURPOSE OF USE	LEGAL REASON FOR PROCESSING
To assess your suitability for employment for the role for which you are applying (background checks, where applicable, will be conducted in compliance with legal requirements), as well as future roles that may become available	<ul style="list-style-type: none"> • Necessary for Principal33's legitimate interests to ensure that it recruits the appropriate employees • To take steps prior to entering in an employment contract with you, where you are considered for employment
To manage and administrate your application	<ul style="list-style-type: none"> • Necessary for Principal33's legitimate interests to ensure that it recruits the appropriate employees • To take steps prior to entering in an employment contract with you, where you are considered for employment

To facilitate communication	<ul style="list-style-type: none"> • Necessary for Principal33's legitimate interests to ensure proper communication with you and within the organization • To take steps prior to entering in an employment contract with you, where you are considered for employment
Verifying eligibility to work (excluding background checks)	<ul style="list-style-type: none"> • To take steps prior to entering in an employment contract with you, where you are considered for employment • Necessary for Principal33's legitimate interests to comply with applicable immigration and/or employment laws and regulation
Perform data analytics, including of our candidate pool, to improve our recruitment process and the Website	<ul style="list-style-type: none"> • Necessary for Principal33's legitimate interests to ensure that it improves its recruitment processes
If you register/sign up on the Website, we will enter you in a database to receive job alerts and/or information on job events	<ul style="list-style-type: none"> • Necessary for Principal33's legitimate interests to ensure that it recruits the appropriate employees
To comply with or monitor compliance with applicable law or regulation	<ul style="list-style-type: none"> • Necessary to comply with Principal33's legal obligations as a business entity • Necessary for Principal33's legitimate interest to protect the rights and interests of Principal33, our employees, candidates and others

If we ask you to provide Personal Data to comply with a legal requirement or to facilitate the recruitment process, we will inform you at the relevant time whether the provision of your Personal Data is mandatory or optional and explain the specific legal basis for processing it. Please note that failure to provide the required personal data may result in delays or the inability to proceed with the recruitment process.

Principal33 will regularly review its data processing activities to ensure that they remain necessary, relevant and compliant with the GDPR principle of purpose limitation. This means that we continuously assess whether the data we collect is adequate, relevant and limited to what is necessary for the purposes for which it is processed.

9. Parties with Access to Your Personal Data

In general, access to your Personal Data will be restricted to the relevant people in Principal33 who need it for the purposes set out in this Privacy Notice (e.g., your potential future managers and direct colleagues, recruitment, HR and IT).

- 9.1.** Principal33 may share your Personal Data, as required and in accordance with applicable laws, as follows:
- **Third party service providers:**
 - third-party service provider who is located in the Spain to assist us in managing our website and who may have access to your Personal Data.
 - other third-party service providers who have been retained to provide services on behalf of Principal33, such as for the storage of data or the maintenance of our website.

Principal33 ensures that all third-party service providers are bound by strict confidentiality agreements and are compliant with GDPR requirements when processing Personal Data on behalf of Principal33

- Principal33 Affiliates: Due to the nature of Principal33's business, Personal Data may be shared, disclosed and transferred between the various Principal33 Affiliates where such transfers are required for legitimate business reasons, e.g., recruiters, hiring managers, talent managers and administrative and IT functions may be located in other countries
- **Clients:** Where applicable, your Personal Data, such as your CV, may be shared with the relevant client for project-related purposes.
- **Potential mergers or acquisitions:** Following an acquisition of any or all of Principal33's business operations, whether by way of acquisition of shares or stock, merger, consolidation, or asset purchase and regardless of any possible new company name, we will notify you about any changes in the data controllership.
- **Insolvency proceedings:** If Principal33 becomes the subject of insolvency proceedings, whether voluntary or involuntary, Principal33 or its liquidator, administrator, receiver or administrative receiver or similar officer may transfer, license or otherwise dispose of your Personal Data in a transaction approved by the court of competent jurisdiction. We will notify you of any relevant sale of our business operations by a posting on the Website or via email.
- **Legal obligations:** We may disclose your Personal Data where required to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant.
- **Public bodies and authorities:** We may disclose your Personal Data pursuant to a request from a governmental or regulatory entity/body or if we believe in good faith that such disclosure is necessary to (1) comply with legal or regulatory requirements or for the purposes of compliance with legal process; (2) prevent crime; (3) prevent any terrorist activity or threat to national security; (4) protect the personal safety or wellbeing of users of the Website or any other person.
- **Legal proceedings:** Principal33 may disclose your Personal Data to the extent permitted by appropriate law where necessary to establish, exercise or defend against potential, threatened or actual legal claims.
- **Vital interests:** We may disclose your Personal Data where necessary to protect your vital interests or those of another person.

9.2. Disclosure without notification

There may be circumstances where Principal33 discloses Personal Data to third parties without notifying Candidates. These circumstances could include:

- Where the information is publicly available;
- Where Principal33 is required to do so by law or by order of a court or tribunal or where Principal33 has a good faith belief that such disclosure is reasonably necessary to comply with a legal obligation, process or request;
- Where it is alleged by a law enforcement authority that an Candidate is guilty of a criminal offence or is civilly liable in a legal action and Principal33 has a good faith belief that any disclosure is necessary to comply with a legal process or request.
- Where Principal33 is legally required to or has a good faith belief that such disclosure is reasonably necessary to protect the rights, property or safety of Principal33, its Employees and vendors, clients, customers of clients, third parties or the public as required and permitted by law.

9.3. International transfer of your Personal Data

If such transfers are necessary for legitimate business purposes, Principal33 may transfer your Personal Data internationally, including outside of Europe. In such cases, Principal33 will ensure that these transfers are compliant with the GDPR's requirements for international data transfers, including implementing appropriate safeguards such as Standard Contractual Clauses or other lawful transfer mechanisms.

10. Personal Data retention

We will retain Personal Data for the period necessary to fulfil the purposes outlined in this Notice, but no longer than 24 months after the completion of the recruitment process, unless a longer retention period is required or permitted by law. Our retention periods are determined based on (i) the duration of the application process, (ii) the existence of an ongoing relationship with you; (iii) legal obligations to which we are subject; and (iv) our legal position (e.g., statutes of limitations, litigation or regulatory investigations).

If you become an Employee of Principal33, your Personal Data will be retained in accordance with our GDPR Policy.

Where there is no ongoing legal or business need to retain the data, it will be securely deleted or anonymized.

11. Measures to Safeguard Personal Data

Principal33 implements appropriate security measures designed to prevent unlawful or unauthorized Processing of Personal Data and accidental loss of or damage to Personal Data. These measures are designed to prevent unauthorized or unlawful processing, as well as accidental loss, destruction, or damage of Personal Data. Where we contract with third parties to provide services that may enable them to access your Personal Data, we require them by contract to have similar security controls in place.

Security measures include:

- Restricting access to personal data to authorized personnel only.
- Securing physical storage locations and ensuring proper encryption of data.
- Implementing multi-step authentication for access to IT systems containing personal data.
- Prohibiting the use of external storage media for personal data.
- Regularly training employees on data protection protocols.
- Conducting regular testing and audits of security measures.
- Promptly notifying authorities in the event of a security incident.

Regular security audits and vulnerability assessments are conducted to ensure the integrity and security of Personal Data.

12. Breach Notification Procedures

In the event of a Personal Data breach that is likely to result in a high risk to the rights and freedoms of Employees, Principal33 will notify the affected Candidates without undue delay. This notification will include a description of the nature of the breach, the likely consequences and the measures taken or proposed to mitigate the breach's potential adverse effects. Principal33 will also notify the relevant data protection authority, where required, in accordance with GDPR requirements.

13. Your rights

As provided by applicable law, you have the following rights regarding your Personal Data:

- **Access:** You can request access to your Personal Data and obtain details about the specific pieces of Personal Data that we collect, use, and disclose.
- **Correction, Update or Deletion:** You can request that your Personal Data be corrected, updated, or deleted if it is inaccurate.
- **Restriction:** You can ask us to restrict the processing of your Personal Data.

- **Portability:** You have the right to request the transfer of your Personal Data to another service provider or organization.
- **Objection:** You can object to the processing of your Personal Data, especially where processing is based on legitimate interests or for direct marketing purposes.
- **Withdrawal of Consent:** If we process your Personal Data based on your consent, you may withdraw your consent at any time. However, this will not affect the lawfulness of processing carried out prior to the withdrawal of consent.

To exercise these rights, please contact us at dataprotection@Principal33.com.

We will respond to your requests in compliance with applicable data protection laws, typically within 30 days. However, we may extend this period by up to two additional months if necessary, depending on the complexity of the request. In general, no fee will be charged, but if the request is manifestly unfounded or excessive, we may charge a reasonable fee to cover administrative costs.

Before responding, we may verify and authenticate your identity. We may ask for specific information, such as your name, physical address, birth date, valid email address, and telephone number, to ensure that your request is valid and secure.

If we need to retain an archival copy of your Personal Data due to legal obligations after processing a deletion request, we will follow the statutory retention period.

If you believe your data protection rights have been violated, you have the right to lodge a complaint with a data protection authority or initiate legal action at the competent court.

We do not discriminate against individuals for exercising their data protection rights.

14. Contact details

If, at any time, you have questions or concerns about the operation of this Notice or believe that we have not adhered to this Notice, please email us: dataprotection@principal33.com. In addition, you may submit concerns or complaints about Principal33's privacy practices at dataprotection@principal33.com.

You also have the option to indicate your preferred method of contact for any future communications during the recruitment process. We will make every effort to respect your preferences.

In addition to contacting us, you have the right to lodge a complaint with The National Supervisory Authority for Personal Data Processing (ANSPDCP) if you so choose.

15. Changes to this Notice

We reserve the right to update this Notice at any time. It is your responsibility to review this Notice each time you provide Personal Data, as changes may occur. Any updates will be posted on this page, and significant changes will be prominently highlighted on our website.