

brainlabs

Candidate Privacy Notice

Scope and Overview

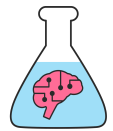
Brainlabs is committed to protecting the privacy and security of your personal information. This Privacy Notice describes how Brainlabs and its subsidiaries, affiliates, and related entities (collectively, "Brainlabs," "we," or "us") collect and process personal information about you as part of our recruitment and selection process. This Privacy Notice applies to current and former candidates and applicants for open roles across our business ("you").

This Privacy Notice describes the categories of personal information that we collect, how we use your personal information, our lawful bases for processing your personal information, how long we store your personal information, when we may disclose your personal information to third parties, and when we may transfer your personal information outside of your home jurisdiction. This Privacy Notice also describes your rights regarding the personal information that we hold about you, including how you can access, correct, and request erasure of your personal information. Contact information is included at the end of this Privacy Notice.

Collection of Personal information

Personal information is any information about an identifiable individual. We may collect, store, and process the following categories of personal information as part of our recruitment and selection process:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- CV, resume, application form or cover letter, and any photos included.
- Previous employment records (including previous roles held, professional memberships, references).



- Government identification numbers such as social insurance or other national insurance number, driver's license number, or other identification card number.
- Copies of passports or other photo ID.
- Copies of proof of address documents (e.g. bank statements or bills).
- Tax status.
- Salary information.
- Protected Characteristics (for the purpose of equal opportunities monitoring).
- Location of employment.
- Education history.
- Aptitude test and technical exercise results and scores.
- Proof of work eligibility / right to work information.
- Details of any criminal convictions or history (e.g. DBS checks).
- CCTV footage (if you attend our offices for an interview).
- Recordings and transcripts from interviews.
- Other personal information that you voluntarily provide to us or to a third party involved in the recruitment process.

We need some of the personal information listed above to process your application or to otherwise consider you for an open role. If you do not provide such personal information, we may not be able to continue with the application or consider you for open roles at Brainlabs.

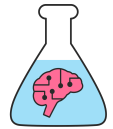
We will collect most of the personal information that we process directly from you. In certain circumstances third parties may provide your personal information to us, such as recruitment providers, former employers or official bodies (such as regulators or criminal record bureaus).

Use of Personal Information

We use the above personal information for the following purposes:

- to administer and manage our recruitment process and your application,
- to assess qualifications for a particular job or task,
- for the security and safety of the business, including to ensure network and information security, including preventing unauthorised access to our systems,
- to enable use and functionality of Brainlabs systems and third party tools authorised for use by Brainlabs, as part of business operations,
- for business management, reporting and planning,
- for benchmarking for future candidates and open roles,
- for data analytics purposes to assess our policies, programmes and initiatives,
- for accounting, auditing and insurance purposes,
- to deal with legal disputes,
- for complying with applicable law,
- to prevent fraud,
- to consider and make any appropriate adjustments as a result of any disability,
- for equal opportunities monitoring, and
- to support internal administration with our affiliated entities.

As part of our normal business operations, we may use artificial intelligence (AI) tools and platforms for some of the purposes outlined above, for example for sourcing potential candidates



(from publicly accessible sources or using third party providers with their own candidate lists), undertaking an initial review of candidates and/or applications, to organise interviews and meetings, and to process your application and results from aptitude tests and technical exercises. Some AI tools we use may process your personal information in the course of their operation. This could include details from your CV and application, and results from any tests or technical exercises undertaken by you during the process. This processing is necessary for our legitimate interests.

We take steps to ensure that AI tools used at Brainlabs are configured and used in a manner consistent with our data protection obligations. This includes assessing tools prior to deployment and ensuring appropriate data processing agreements are in place with third-party AI providers where required. Brainlabs adheres to its internal AI governance policies when using AI tools. We ensure the use of AI tools and any outputs are subject to human oversight and review. We do not make decisions about your application that produce legal or similarly significant effects based solely on automated processing, including AI tools, without human review.

Recruitment providers that we work with may similarly use AI tools as part of their own sourcing and selection processes, including the use of automated decision-making (ADM) features. Those recruitment providers may be 'data controllers' in respect of the data they collect and process about you from their own sources. If you require more information on the third party recruitment providers we work with, including their use of ADM and their bias prevention measures, you can contact us using the details at the end of this notice.

Lawful Basis for Processing

We must have a lawful basis for collecting and using your personal information. We rely on the following lawful bases for the processing outlined in this notice:

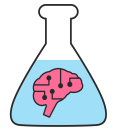
- processing is necessary to comply with a legal or regulatory obligation
- processing is necessary for our legitimate interests or the legitimate interests of third parties and your interests and rights do not outweigh those interests
- processing is necessary to protect your vital interests (or someone else's)
- processing is necessary in the public interest
- you have consented to the processing

When we use consent as our lawful basis you have the right to withdraw your consent at any time

Collection and Use of Special Categories of Personal Information

The following special categories of personal information are considered sensitive under applicable data protection laws and may receive special protection:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic information.
- Biometric information.
- information concerning health.



- Sexual orientation.
- Information relating to criminal or administrative proceedings or sanctions.

We may collect and process the following special categories of personal information to carry out our obligations under employment law, for the performance of the employment contract, or as applicable law otherwise permits:

- Trade union membership information for the purpose of paying trade union premiums.
- Physical or mental health information or disability status to comply with health and safety obligations in the workplace, to make appropriate workplace accommodations, as part of sickness absence monitoring, and to administer benefits.
- Race or ethnic origin, religious affiliation, health information and sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

We will always treat special categories of personal information as confidential, and we will only share such information internally where there is a specific and legitimate purpose for sharing the information.

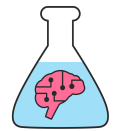
Data Sharing

We disclose your personal information to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information in connection with the purposes described above, including third-party service providers who provide services to us or on our behalf. Third-party service providers may include recruitment or placement agencies, providers of platforms and tools including application and recruitment management tools, and information storage or hosting providers. These third-party service providers may be located outside of your country of residence.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal information consistent with our policies and any information security obligations applicable to us as your employer.

We may also disclose your personal information for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies for the purposes set out in this Privacy Notice.
- As part of our regular reporting activities to other members of our group of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we disclose the minimum personal information necessary for the specific purpose and circumstances.
- To protect the rights and property of Brainlabs.
- During emergency situations or where necessary to protect the safety of persons.
- Where personal information is publicly available.
- If a business transfer or change in ownership or corporate structure occurs and the disclosure is necessary to complete the transaction. In these circumstances, we will limit information sharing to what is necessary.
- For additional purposes with your consent where such consent is required by law.



Cross-Border Data Transfers

Where permitted by applicable law, we may transfer the personal information we collect about you to other jurisdictions that may not be deemed to provide the same level of data protection as the UK or your country of residence, as necessary for the purposes set out in this Privacy Notice.

We have implemented data transfer mechanisms that comply with applicable data protection laws to secure the transfer of your personal information to the United States and other jurisdictions.

Data Security

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal information against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal information to those employees, agents, contractors, and other third parties that have a legitimate need for such access.

Data Retention

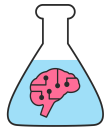
Except as otherwise permitted or required by applicable law or regulation, we retain your personal information for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal information, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes we process your personal information for, and whether we can achieve those purposes through other means. We specify the retention periods for your personal information in our data retention policy.

Under some circumstances we may anonymise your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer an employee of the company, we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

Rights of Access, Correction, Erasure, and Objection

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your employment. By law you may have the right to request access to, correct, and erase the personal information that we hold about you, or object to the processing of your personal information under certain circumstances. You may also have the right to request that we transfer your personal information to another party. If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact us using the contact details at the end of this notice.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some, or all of the personal information that we hold about you, or we may have destroyed,



erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Right to Make a Complaint

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details at the bottom of this Privacy Notice.

You also have the right to make a complaint with the Information Commissioner's Office (ICO) in the UK, or the equivalent data protection authority in your country.

(Website: <https://www.ico.org.uk/make-a-complaint>)

Data Controller Information

Depending on your location and the entity that you are submitting your application to, the following entities in the Brainlabs group are data controllers of your personal information:

Brain Labs Digital Ltd (UK); Brain Labs Bidco Ltd; Brain Labs DC Ltd; Brainlabs Digital Inc; Brainlabs USA LLC; Brainlabs APAC PTE. LTD; Brainlabs Canada Ltd; Brainlabs Digital Spain, S.L; Brainlabs Brasil Digital LTDA; Brainlabs Marketing Digital México, S. DE R.L. DE C.V; Brainlabsdigital India Private Limited; Nabler Analytics LLC; Brainlabs Digital S.A; Jack Nimble PTY Ltd; Bryant & Brother PTY Ltd.

Contact Us

If you have any questions about our processing of your personal information or would like to exercise your rights as a data subject, please contact Brainlabs' Data Protection Officer at:

gdpr@brainlabsdigital.com

Last reviewed and updated - 24 August 2026

Next Review August 2027