

## RECRUITMENT PRIVACY NOTICE

This notice is being shared with you in order to describe how Adlook processes your personal data with regard to the recruitment process, as well as to follow transparency obligations arising from personal data laws, specifically the Brazilian General Data Protection Law (“**LGPD**”).

### DATA CONTROLLER



The controller of your personal data collected and processed during the recruitment process is ADLOOK BRAZIL LTDA., a company incorporated and existing under the law of Brazil, with its registered office at: Av. Paulista 352, 7 andar, Conj. 77, Bela Vista - São Paulo, SP - CEP: 01310-905, BRAZIL, duly enrolled in the National Register of Corporate Taxpayers under number: CNPJ: 48.053.968/0001-02, NIRE - 35239967355,

hereinafter: “**we**”, “**us**” or “**Adlook**”.

### CONTACT DETAILS




You can contact us in the following manner: (1) by mail at: Av. Paulista 352, 7 andar, Conj. 77, Bela Vista - São Paulo, SP - CEP: 01310-905, BRAZIL, (2) by e-mail: [dpo@adlook.com](mailto:dpo@adlook.com), (3) or by telephone: +48 22 188 12 71.




### CATEGORIES OF COLLECTED DATA AND PURPOSES FOR THE PROCESSING








We process the following categories of personal data:

- (a) the personal data you provided in your recruitment documents (recruitment form, CV, cover letter) such as identifiers as your first and last name, email address, any other contact details, professional qualifications, job history including names of previous employers, work dates and work locations, **for the purpose of carrying out the recruitment process for the position you are applying for** (on the basis of contractual obligations);
- (b) the personal data you provided in your recruitment documents (recruitment form, CV, cover letter) such as your first and last name, email address, any other contact details, professional qualifications,

	<p>job history including names of previous employers, work dates and work locations, and during subsequent stages of the recruitment process (such as tests answers, solutions to assignments and results of reading comprehension tests or psychometric tests <b>for the purpose of (1)(a) conduct the recruitment process for the position you are applying for and (b) in order to carry out future recruitment processes (subject to your specific consent), (2) conducting statistics for internal purposes, (3) improving our recruitment process, (4) measuring your satisfaction during the recruitment process through a survey, and (5) protecting our rights or defend claims related to the recruitment process, if needed</b> (on the basis of our legitimate interest);</p> <p>(c) any additional personal data provided by you <b>for the purpose of managing the recruitment process</b> (on the basis of your consent);</p> <p>Your personal data will not be processed by automated decision-making or profiling.</p>
<p><b>LEGAL BASIS FOR THE PROCESSING</b></p> 	<p>The <b>legal basis</b> for processing your personal data, as indicated in the above row, is:</p> <p>(a) necessity to process your personal data in order to conclude a contract with you – to the extent that is necessary to conclude an agreement (“<b>contractual obligations</b>”);</p> <p>(b) legitimate interests pursued by the controller (“<b>legitimate interest</b>”), specifically the legitimate interest to (1) manage the recruitment process, (2) conduct statistics for internal purposes, (3) improve our recruitment process, (4) measure satisfaction during the recruitment process in a survey and (5) protect our rights or defend claims connected with the recruitment process, if needed; or</p> <p>(c) your consent (“<b>consent</b>”), (a) for the purpose of future recruitment processes, and (b) with respect to any additional personal data provided by you which is not required to take part in our recruitment process.</p>

<p><b>RECIPIENTS OF PERSONAL DATA</b></p> 	<p>Your data will be processed only by authorized Adlook staff. Your personal data may be disclosed to other companies of the Adlook corporate group.</p> <p>Additionally, your personal data will be transferred to data processors engaged by Adlook, i.e., services related to recruitment (such as those providing test solutions or IT systems for the recruitment process) and those providing storage and communication services (Google Cloud). These entities will process your personal data on the basis of the data processing agreements with Adlook and solely in accordance with the instructions of Adlook.</p> <p>In cases where it is necessary or required by law, we may also share your personal data with law enforcement agencies, supervisory authorities or in court proceedings.</p>
<p><b>TRANSFERS TO OTHER COUNTRIES</b></p> 	<p>Adlook may occasionally transfer your data to a country outside of incorporation of Adlook, including outside the European Economic Area (EEA). In such cases, we will take measures to ensure the transfer is in compliance with applicable laws.</p> <p>By reading this privacy notice you acknowledge that your personal data may be transferred outside Brazil.</p>
<p><b>RETENTION PERIOD</b></p> 	<p>Adlook will store your personal data for the duration of the recruitment process and for an additional 6 months thereafter (or 18 months if you have consented to be considered for future recruitment opportunities).</p> <p>Furthermore, if your personal data is processed based on consent, Adlook will delete it promptly upon its withdrawal, provided there is no other legal basis for further processing.</p> <p>If a dispute arises between you and Adlook, we will store your personal data until it is resolved (including enforcement of claims).</p>

<p><b>DATA SUBJECT'S RIGHTS</b></p>  	<p>You have the following rights related to the processing of personal data:</p> <ul style="list-style-type: none"> <li>a) the right to obtain confirmation of the existence of the processing of personal data and rights to access the same,</li> <li>b) the right to rectification of incomplete, inaccurate and out-of-date personal data,</li> <li>c) the right to erasure of your unnecessary, excessive or unlawfully processed personal data,</li> <li>d) the right to demand the block or anonymization of the processing of your unnecessary, excessive or unlawfully processed personal data,</li> <li>e) the right to oppose to the processing of your data obtained without consent such as in cases where we process your data based on our legitimate interest, but only if processing was not in compliance with the established in the LGPD,</li> <li>f) the right to be informed of the public and private entities with whom we may share your data,</li> <li>g) the right to request the transfer of your personal data to another supplier,</li> <li>h) the right to withdraw your consent, when we process your data on the basis of consent. Withdrawal of consent does not affect the legality of the processing done up to that point.</li> </ul> <p>To know more about your data protection rights and how to exercise them you can contact our data protection officer at: <a href="mailto:dpo@adlook.com">dpo@adlook.com</a>.</p>
<p><b>SOURCE OF PERSONAL DATA</b></p> 	<p>Your personal data we may have obtained so far (prior to contacting you) may originate from publicly accessible sources such as LinkedIn, other professional networking platform services, and other publicly available websites accessed by our suppliers, recruitment agencies, job boards, or from Adlook Associates who referred you for potential collaboration with us.</p>

<p><b>OBLIGATION TO DISCLOSE PERSONAL DATA</b></p> 	<p>For some data categories, you need to provide us with your personal data because it is necessary to enter into a contract with you. If you don't provide your personal data to us despite the above, you may face the following possible consequences: not being able to take part in the recruitment process conducted by Adlook. Providing your personal data is voluntary but necessary for the fulfillment of the purposes mentioned in this privacy notice. Without these data, we cannot perform the respective obligations.</p>
<p><b>RIGHT TO LODGE A COMPLAINT</b></p> 	<p>You also have the right to lodge a complaint with the supervisory personal data protection authority, i.e., National Data Protection Authority ('ANPD').</p>