

1inch Applicant and Candidate Privacy Policy

Last updated: May 5, 2023

This Policy applies to job applicants and those applicants who proceed through the 1inch recruitment process. This Policy does not form part of any contract of employment or other contract to provide services.

Your use of the 1inch Network is governed separately by any applicable terms and our general Privacy Policy.

This policy explains:

- What information we collect during our application and recruitment process and why we collect it;
- How we use that information; and
- How to access and update that information.

Types of information we collect

This policy covers the information you share with us and/or which may be acquired or produced by 1inch during the application or recruitment process including:

- Your name, address, email address, telephone number and other contact information;
- Your resume or CV, cover letter, previous and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of an application and/or the application and recruitment process;
- Information from interviews and phone-screenings you may have, if any;
- Details of the type of work you are or may be looking for, current and/or desired salary and other terms relating to compensation and benefits packages, willingness to relocate, or other job preferences;
- Details of how you heard about the position you are applying for;
- Any sensitive and/or demographic information (also known as special categories of data) processed during the application or recruitment process such as gender, information about your citizenship and/or nationality, medical or health information and/or your racial or ethnic origin;
- Reference information and/or information received from background checks (where applicable), including information provided by third parties;
- Your information from publicly available sources, including online, that we believe is relevant to your application or a potential future application (e.g. your LinkedIn profile); and/or

- Information related to any assessment you may take as part of the interview screening process.

Please note that we treat all special categories of data with extra security ensuring specifically that only authorized individuals are able to access it.

How we use information we collect

Your information will be used by 1inch for the purposes of carrying out its application and recruitment process which includes:

- Assessing your skills, qualifications and interests against our career opportunities;
- Verifying your information and carrying out reference checks and/or conducting background checks (where applicable) if you are offered a job;
- Communications with you about the recruitment process and/or your application(s), including, in appropriate cases, informing you of other potential career opportunities at 1inch;
- Creating and/or submitting reports as required under any local laws and/or regulations, where applicable;
- Where requested by you, assisting you with obtaining an immigration visa or work permit where required;
- Making improvements to 1inch's application and/or recruitment process;
- Complying with applicable laws, regulations, legal processes or enforceable governmental requests; and/or
- Proactively conducting research about your educational and professional background and skills and contacting you if we think you would be suitable for a role with us.

We will also use your information to protect the rights and property of 1inch, our users, applicants, candidates, team members or the public as required or permitted by law.

If you are offered and accept work with 1inch, the information collected during the application and recruitment process will become part of your 1inch record.

If EU data protection or UK data protection law applies to the processing of your information, our legal basis for processing your information

We collect and process your information where it is necessary in order to take steps, at your request, prior to our potentially entering into a contract with you.

We may seek your consent to process your personal information in specific circumstances mentioned in this Policy (e.g. when sharing your personal data with third parties or processing special categories of data). In such cases, we will additionally provide you with information on why and how your personal

data may be processed and ask for your prior and explicit consent. You have the right to withdraw consent at any time for processing of your personal data based on consent. For more information on your rights, please refer to Section “Your rights in respect of your information”.

If we use your information to improve our application or recruitment process, we do so on the basis that it is in our legitimate interests to ensure we recruit the best possible candidates.

We may also process your personal data where necessary to comply with a legal obligation that may apply to us or for purposes connected to legal claims.

Who may have access to your information

- Your information may be shared with other 1inch entities in various jurisdictions, in relation to the purposes described above. If you have been referred for a job at 1inch by a current 1inch team member, with your consent, we may inform that team member about the progress of your application and let that team member know the outcome of the process. In some cases, if it is identified that you have attended the same university/school or shared the same previous employer during the same period as a current 1inch team member, we may consult with that team member for feedback on you.
- 1inch may also use service providers acting on 1inch’s behalf to perform some of the services described above including for the purposes of the verification / background checks. These service providers may be located outside the country in which you live or the country where the position you have applied for is located.
- 1inch may sometimes be required to disclose your information to external third parties such as to local labour authorities, courts and tribunals, regulatory bodies and/or law enforcement agencies for the purpose of complying with applicable laws and regulations, or in response to legal process.
- We will also share your personal information with other third parties if we have your consent (for example if you have given us permission to contact your references), or to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of 1inch, our users, applicants, candidates, team members or the public or as otherwise required by law.
- It is your responsibility to obtain consent from references before providing their personal information to 1inch.
- 1inch operates globally, which means your information may be stored and processed outside of the country or region where it was originally collected. In some of these countries, you may have fewer rights in respect of your information than you do in your country of residence. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain legal frameworks relating to the transfer of data, such as the European frameworks described below. The European Commission has determined that certain countries outside of the European Economic Area (EEA) adequately protect personal data. You

can review current European Commission adequacy decisions on [the Commission website](#). To transfer data from the EEA to other countries, such as the United States, we comply with legal frameworks that establish an equivalent level of protection with EU law.

- Model contract clauses. The European Commission has approved the use of model contract clauses as a means of ensuring adequate protection when transferring data outside of the EEA. By incorporating [model contract clauses](#) into a contract established between the parties transferring data, personal data is considered protected when transferred outside the EEA or the UK to countries which are not covered by an adequacy decision. We rely on these model contract clauses for data transfers.

1inch takes appropriate steps to protect information about you that is collected, processed, and stored as part of the application and recruitment process.

Our retention of your information

If you apply to 1inch and your application is unsuccessful (or you withdraw from the process or decline our offer), 1inch typically retains your information for a period of 12 months after your application, and beyond if we have your consent. 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 jobs at 1inch 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 legal@1inch.io. Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

Your rights in respect of your information

In some regions, you may have certain rights under applicable data protection laws. For instance, under the EU and UK General Data Protection Regulation, you have the following rights: access, rectification, deletion, objection, restriction of processing, and data portability of your personal data.

Please note that some of these rights are subject to specific conditions set out in the applicable personal data protection regulation. Therefore, if your particular situation does not meet these conditions, we will unfortunately not be able to respond to your request. In this case, we will inform you of the reasons for our refusal.

- **Right of access** – You may request access to your personal data at any time. If you exercise your right of access, we will provide you with a copy of your personal data in our possession as well as all information relating to its processing.
- **Right of rectification** – You have the right to ask us to rectify or complete any personal data in our possession that you consider to be inaccurate or incomplete.

- **Right to erasure/to be forgotten** – You can ask us to delete your personal data if, for example, it is no longer necessary for the processing we carry out. We will use our best efforts to comply with your request. Please note, however, that we may have to retain some or all of your personal data if we are required to do so by applicable law or if the personal data is necessary for the establishment, exercise or defense of our rights.
- **Right to restriction of processing** – You may also request that we restrict the processing of your personal data on grounds relating to your particular situation. For example, if you dispute the accuracy of your personal data or object to the processing of your personal data, you may also request that we do not process your personal data for the time necessary to verify and investigate your claims. In such cases, we will temporarily refrain from processing your personal data until necessary verifications have been made or until we comply with your requests.
- **Right to data portability** – You may request portability of the personal data you have provided us with. At your request, we will provide you with your personal data in a readable and structured format so that you can easily re-use it. The portability of your personal data applies only to personal data that you have provided to us or that result from your activity on our Application, under the condition that the disclosure of your personal data does not infringe the rights of third parties. If we are unable to comply with your request, we will inform you of the reasons for our refusal.
- **Right to object** – You may object at any time, on grounds relating to your particular situation, if we use your personal data. We will then stop processing your personal data unless there are overriding legitimate grounds for continuing to process your personal data (for example, if your personal data is necessary for the establishment, exercise or defense of our rights or the rights of third parties in court proceedings). If we are unable to comply with your request to object, we will inform you of the reasons for our refusal. You can also object at any time to our processing of your personal data for commercial prospecting purposes.
- **Right to withdraw consent** - You have the right to withdraw consent at any time for personal data processing based on consent. Withdrawing your consent prevents us from processing your personal data but does not affect the lawfulness of the processing carried out before the withdrawal.

Country Specific Rights: You may also be granted specific rights as regards our processing of your personal data depending on the law applicable in the country you are residing in.

If you wish to exercise your rights, please contact legal@1inch.io. We will respond to any requests in accordance with applicable law, and so there may be circumstances where we are not able to comply with your request. To be able to process your request efficiently, we may ask you additional information to confirm your identity and/or to help us retrieve the personal data related to your request.

If you are in the EEA, the UK or Brazil and if you can't find the answer to your question in this policy, you can contact 1inch's legal team at legal@1inch.io. Depending on your country of residence, you may also

raise any questions or concerns you have regarding your personal information with your local data protection authority.

Changes to this Policy

We may change this policy from time to time (for example, if the modifications impact the categories of personal data processed or the purposes of processing). We will post any changes to this policy on this page.

U.S. state law requirements

Some U.S. state privacy laws, such as the California Consumer Privacy Act (CCPA), require specific disclosures for state residents.

This policy is designed to help you understand how 1inch handles your information. In the sections above, we explain: (1) the categories of information 1inch collects and the sources of that information; (2) how 1inch uses information; (3) when 1inch may disclose information; and (4) how 1inch retains information. 1inch does not sell your personal information. 1inch also does not “share” your personal information as that term is defined in the CCPA.

State laws like the CCPA also provide the right to request information about how 1inch collects, uses, and discloses your information. And they may give you the right to access and correct your information, and to request that 1inch delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising these privacy rights.

If you have questions or concerns related to your rights under CCPA, or would like to exercise your rights, you (or your authorized agent) can contact 1inch at legal@1inch.io. We'll validate your request by verifying your interactions with 1inch, and may require that you provide us with additional information, such as any names, phone numbers or email addresses you have used when communicating with us.

The CCPA also requires a description of data practices using specific categories. This table uses these categories to organize the information in this policy.

Categories of information we collect	Business purposes for which information may be used or disclosed	Parties with whom information may be disclosed
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<u>Identifiers and similar information</u>, such as your name, phone number, and address; username and password; and unique identifiers tied to the browser, application, or device you're using. <u>Demographic information</u>, such as your age, gender, and language(s) spoken. <u>Financial information</u>, such as your current and/or desired salary and other terms relating to compensation and benefits packages. <u>Geolocation data</u>, including as determined by IP address, depending in part on your device and account settings. <u>Audio, electronic, visual, and similar information</u>, such as information transmitted in connection with interviews or phone-screenings you may have, if any. <u>Communications data</u>, such as emails that you may send or receive in connection with the application or recruitment process. <u>Professional, employment, and education information</u>, such as information you provide in connection with the application and recruitment process, as well	<u>Administrative purposes</u>: 1inch uses and may disclose information for purposes related to carrying out its application and recruitment process, including for assessing candidates; verifying information and conducting reference checks and criminal and financial background checks (where applicable); communicating with you; responding to requests for assistance with obtaining an immigration visa or work permit (where required); diversity, equity, inclusion and belonging; and other related activities. <u>Protecting against security threats, abuse, illegal activity, and violations</u>: 1inch uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, 1inch may receive or disclose information about IP addresses that malicious actors have compromised. <u>Research and development</u>: 1inch uses information to improve our application and recruitment process. <u>Use of service providers</u>: 1inch shares information with service	<u>Other people with whom you choose to share your information</u>, such as the content you create, upload, or otherwise provide in connection with the application and recruitment process. <u>Third parties with your consent</u>, for example if you have given us permission to contact your references. <u>Service providers, trusted businesses or persons that process information on 1inch's behalf</u>, based on our instructions and in compliance with this privacy policy and any other appropriate confidentiality and security measures. <u>Law enforcement or other third parties</u>, in response to legal process or enforceable government requests, and as necessary to identify, report on and investigate violations of applicable laws and regulations.
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as information 1inch may otherwise collect through reference checks, criminal and financial background checks (where applicable) and information from publicly available sources, including online, that may be relevant. <u>Other information you create or provide</u>, such as the content you create, upload, or otherwise provide in connection with the application and recruitment process. <u>Inferences</u> drawn from the information above.	providers to perform services on our behalf, in compliance with this privacy policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help perform criminal and financial background checks (where applicable). <u>Legal reasons</u>: 1inch also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement.	
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