



CANDIDATE PRIVACY NOTICE

Last Updated On: September 2025

1. Introduction

This Candidate Privacy Notice ("**Privacy Notice**") describes how Affinidi Group collects, uses, stores, and discloses personal data about individuals who apply for open positions with us. In this regard, the Affinidi Group comprises Affinidi Pte. Ltd., Affinidi GmbH, and Affinidi India Private Limited. References to "Company", "us", "we", and "our" are to the entity within the Affinidi Group that is relevant to your job application.

As used in this Privacy Notice, "personal data" means any data about an individual who can be directly or indirectly identified from that data, or from that data and other information that we hold or are likely to have access to.

2. Types of Personal Data that We Collect

Personal data about you that we may collect includes:

- (a) information you provide to us as part of the application process, including your name, address, telephone number, personal email address, date of birth, gender, nationality, employment history, employment references, qualifications, resume, cover letter, and information disclosed during the interview process;
- (b) information about you that may be obtained from other individuals, such as references during the application process, including from your current or past employer(s) or co-worker(s); and
- (c) information about you that may be collected from our third party service providers or their subcontractors who perform employment-related services for us, such as:
 - (i) recruitment agencies, from which we collect the following categories of data: name, nationality, employment history, academic and professional qualifications, and other details provided in the resume and cover letter; and
 - (ii) background check providers, from which we may collect the following categories of data: social media profile, credit information, educational qualifications, professional qualifications, employment history, civil litigation history, and criminal history, where relevant.

3. How We Process and Use Personal Data

We process and use personal data for the following purposes:

- (a) to verify your identity and the accuracy of your personal details and other information provided;
- (b) to conduct due diligence checks such as credit, background and reference checks, where applicable;
- (c) to assess your skills, qualifications and suitability for employment and potential roles within the Company;
- (d) to communicate with you and/or any third parties (whose contact information is provided by you) in relation to your application;
- (e) to maintain records of our recruitment processes;
- (f) if you are hired, to manage the employment relationship with you, (including human resource programs, training and development, administering employment benefits, conducting disciplinary proceedings, and termination of the employment relationship); and
- (g) to comply with legal or regulatory requirements.

Where the personal data we collect constitutes sensitive personal data, we will process such data only to the extent we are permitted to do so under applicable law.

4. Legal Basis for Processing

Your personal data is collected and processed only to the extent required by law or necessary for the recruitment process which is defined under this Privacy Notice. Depending on your location and the applicable data protection laws (including the GDPR, Singapore PDPA and DPDPA), we rely on one or more of the following legal basis to process your personal data:

- i) Consent; where you have provided your consent to the processing of your personal data.
- ii) Contractual necessity; where the processing is necessary to take steps at your request prior to entering into an employment contract with us.
- iii) Legal obligation; where the processing is necessary for compliance with our legal or regulatory obligations.
- iv) Legitimate interests; where the processing is necessary for our legitimate interests, such as assessing your suitability for a role, conducting background checks (where permitted), and managing our recruitment processes, provided that such interests are not overridden by your rights and freedoms.

5. Disclosure of Personal Data to Third Parties

We may share your personal data with third parties for the purposes of processing your job application. These third parties include companies within the Affinidi Group, recruitment agencies and background check providers. All third-party service providers and companies within the Affinidi Group are required to take appropriate security measures to protect your personal data and may only process your personal data for specified purposes and in accordance with our instructions where applicable.

6. Retention of Personal Data

We will store your personal data in accordance with applicable laws and for as long as necessary to carry out the purposes described in this Privacy Notice.

- i) If your job application is successful, your personal data will be kept as part of your employee records and processed in accordance with our internal Privacy Policy.
- ii) If your job application is unsuccessful, we may retain your personal data for a reasonable period for record keeping purposes, and to consider you for other suitable openings in the future, unless you request earlier deletion (where legally permitted).

7. Contact Information

If you have questions regarding this Privacy Notice, or if you wish to withdraw your consent, or exercise your data protection rights (including, where applicable under your jurisdiction, rights such as access, rectification, erasure, restriction of processing, data portability, or objection), please contact dataprotection@affinidi.com.

Please note that if you withdraw your consent, we may not be able to process your job application, depending on the nature and extent of your request. Withdrawal of your consent does not affect our right to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

When you submit your application, you will be asked to provide your consent for us to process your personal data for the purposes of considering your eligibility for employment, in accordance with this Privacy Notice and applicable laws. In addition, we may rely on other legal basis (such as contractual necessity, legitimate interests, or legal obligations) where applicable. Where you provide us with personal data of persons other than yourself (such as your prior employment references), you represent and warrant that you have obtained appropriate consent from such person for sharing their personal data with us and permitting us or any third party engaged by us to contact them for the purpose of processing your job application.

We rely on the completeness and accuracy of information provided by you or on your behalf. If there is any change in your personal data, including changes to your address or telephone number, or other relevant details, please inform us immediately via dataprotection@affinidi.com.
