Employment Candidate Privacy Notice

1. **Introduction**

This Privacy Notice describes how Accordion Partners LLC., a New York corporation with offices located at 1 Vanderbilt Ave, NY 10017, on behalf of itself and its affiliates including in respect of UK employees Accordion Partners UK Limited and Irish employees Accordion Partners Financial EU Limited (collectively, "Accordion," "we," or "us") collect and process personal data about you during the application, recruitment, and employment process as a "data controller." This means that we are responsible for deciding how we hold and use personal information about you. You are receiving this notice because you are applying to work with us or one of our affiliates or because we have your personal information through our recruitment efforts, or through a prior connection with you.

This Privacy Notice ("Employment Candidate Privacy Notice") makes you aware of how and why your Personal data will be used, mainly for the recruitment, on-boarding, and workforce management, and how long we will retain your data. In this notice, we also make you aware of when we may disclose your or transfer your personal data outside of your home jurisdiction and how to exercise your rights regarding personal data provided to you under the General Data Protection Regulation ("GDPR") and United Kingdom General Data Protection Regulation ("UK GDPR").

We will only process your personal data in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

2. **How We Collect Information About You**
    - Directly from you, the candidate or employee
    - Third parties, in connection with a background, employment, or reference check, subject to your consent where required by law (e.g. Reference providers, previous employers, as applicable)
    - Recruitment consultants and from publicly available online resources

3. **Information We Collect and Hold About You**

For the purposes of this Privacy Notice, personal data means any information about an identifiable individual collected in connection with the recruitment process. Personal data excludes anonymous or de-identified data that is not associated with a particular individual.

During the recruitment and candidate selection process, we may collect, use and store the following information:

- Identification and contact details
    - E.g. Full name, preferred name, residential and mailing addresses, email addresses, phone numbers, country of residence/citizenship

- Application, recruitment, and interview information
    - E.g. curriculum vitae (CV), resume, cover letter, interview notes and assessments, salary/compensation preferences, job preferences, pre-employment screenings (reference checks, right to work verification), audio/video from interviews when used (with notice)
- Public/professional profile information
    - E.g. Professional sites representing roles, skills, publications only as allowed by law and your privacy settings
- Government identification and right-to-work documentation
    - e.g. National identifiers, visa/immigration status, residence/work permits, driver's license information only where necessary and permitted by law
- Education, qualifications, and training
    - E.g. Schools/universities attended, degrees, transcriptions (where appropriate), professional licenses/certifications, training completed, languages, skill matrices
- Employment history and references
    - E.g. Previous employers, titles, dates of employment, responsibilities, reason for leaving (where provided), and reference materials
- Background screening results
    - Financial, bankruptcy, and credit checks (only where relevant and permitted by law)
- System identifiers and logs, security access controls such as CCTV and photo images for security and building identification purposes

Where necessary and permitted for recruitment, hiring, onboarding and employment administration, compliance, and workplace health and safety, we may collect limited **special categories** of personal/**sensitive** data as defined by the GDPR:

- Racial or ethnic origin
- Data concerning health (including disability status)
- Information about criminal conviction history where permitted by law or in circumstances where the position so justifies and we have a legal ground to do so

For candidates converted into Accordion employees, we may additionally collect, use, and store the following information:

- Financial information
- Salary, compensation, and other remuneration information
- Governmental identification numbers
- Terms and conditions of employment
- Disability accommodation information
- Voice, image, and video data
- Your preferences in relation to our use of your personal data

4. How We Use Information About You

We process your personal data where applicable law permits or requires it in connection with carrying out our application and recruitment process, to take steps necessary to enter into an employment contract with you, where the processing is necessary to comply with a legal obligation that applies to us, for our legitimate interests, the legitimate interests of third parties, or with your consent if applicable law requires consent (Art. 6(1) GDPR).

For the recruitment process, we use the data collected to:

- Assess candidates' skills, qualifications, and fit for the role at Accordion
- Conduct background and reference checks, such as a Disclosure and Barings Service (DBS) check, where applicable
- Receive feedback and input from your experience with Accordion's recruitment processes
- Comply with legal or regulatory requirements
- If you receive an offer and accept a role with us, the information collected during the recruitment process will become part of your employment record.

For candidates converted into Accordion employees, we may use the additional data collected for other processing purposes:

- Administering payroll
- Administering our employment benefits (e.g. health insurance)
- Understanding our skillsets and expertise for workforce management and planning
- Monitoring the security of Accordion's physical premises
- Safeguarding Accordion's assets (e.g. devices) through IP address to ensure network security
- Operating, reviewing, and responding to CCTV surveillance off Accordion's premises, including monitoring footage if required
- Producing and publishing promotional materials using employees' image and footage (in manual, electronic, or any other form) relevant to Accordion's legitimate interests in promotional and/or publicity activities across in digital, social media, TV, and any other forms promotions.

As described in Section 3, some of our processing may involve special categories of data or sensitive information. This information will be processed where permitted by law using a specific legal justification under one of the following bases:

- Where explicit consent has been given; or
- Where processing is permitted by law
    - For the purpose of carrying out obligations and exercising the rights of Accordion in the field of employment law, social security, and social protection law, to the extent permissible under applicable laws
    - We will use information about convictions and sentences to determine your suitability for the role you have applied to the extent legally permissible

- Assess my suitability for the role applied for and to ensure compliance with applicable legal, regulatory, or contractual obligations
- For the purposes of preventative or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
- To protect your vital interests or another person where you are physically or legally incapable of giving consent (for example, emergency situations);
- For the establishment, exercise or defense of legal claims;
- For the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

5. **Automated Decision Making**

You will not be subject to hiring or performance decisions based solely on automated data processing, including profiling. We may use the assistance of semi-automated solutions to assist our tasks, but decisions will be made by our team members.

6. **Data Sharing**

We may share your data with third parties, including third-party service providers and affiliated entities to assist us with the recruitment processes. We also may share your personal information where required by law.

We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification, background checks, and data storage. These third-party service providers may be located outside of the country in which you live or the country where the position you have applied for is located. We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. If we disclose your personal data to third parties, we will only disclose the personal data necessary to meet our business needs or legal requirement. We only permit them to process your personal data for specified purposes in accordance with our instructions.

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

- To other members of our group of affiliated companies (including outside of your home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to administer the application and recruitment process
- To regulators, law enforcement, public authorities or other third parties where necessary to comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to

ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances
- To law enforcement, public authorities or other third parties to protect the rights and property of Accordion
- To law enforcement, emergency services, public authorities or other third parties during emergency situations or where necessary to protect the safety of persons.
- Where personal data is publicly available
- To third parties to whom we may choose to sell, transfer, or merge parts of our business or assets if the disclosure is necessary to complete the transaction. In these circumstances, we will limit data sharing to what is necessary, and we will anonymize the data where possible
- For additional purposes with your consent where such consent is required by law

We do not sell your personal information.

7. **Cross-Border Data Transfers**
Accordion Partners LLC. is located in the United States and is governed by United States law. Your personal information will be transferred to, stored, and processed in the United Stated when you are applying to work with Accordion or one of our affiliates. Therefore, your personal information will be processed and stored on systems used by us in the United States. Such locations may be in countries that do not provide a level of data protection comparable to the level in our home country. Where this is the case, Accordion will ensure that appropriate or suitable safeguards are in place to protect your personal information and that its transfer is in compliance with applicable data protection laws. If you are in the EEA, UK, or Switzerland and your personal information is shared within the Accordion network, transfers out of countries deemed "adequate" by the European Commission, UK authorities, or Swiss laws, as applicable, will be appropriately safeguarded.

8. **Data Security**
We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access. For questions related to security of personal data covered in this privacy notice, please contact **privacy@accordion.com** and we will connect you with our security team.

9. **Data Retention**
Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting requirements, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, we consider our statutory obligations, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes

through other means. We specify the retention periods for your personal data in our data retention policy, which you can request by contacting us at **privacy@accordion.com.**

If you do not convert to an Accordion employee, we will retain your application, personal, and sensitive data for one year after date of receipt. Information will securely be destroyed in accordance with our document retention policy and applicable laws and regulations.

Once we no longer have a legal right to hold your personal data, we will delete, or in some circumstances, anonymize your personal data 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. In some circumstances, notwithstanding any legal or regulatory obligations, you can ask us to delete your personal data. See **Section 11** for more information.

If you are offered a role and you accept employment with Accordion, the personal data we collected during the application and recruitment process will become part of your employment record, and we will use it in connection with your employment consistent with our employee personal data use and retention policies.

10. **Your Rights: Access, Correction, Erasure, Restrictions, Objections, and Data Portability**
By law you may have the right to request access to, correct, and erase the personal data that we hold about you, or restrict the processing of your personal data under certain circumstances. You may also have the right to request that we transfer your personal data to another party. **To exercise these rights, please contact us at privacy@accordion.com.** All communication must be in writing.

Request Access to your personal data – The right to request a copy of the personal data we hold and verify the information if we are processing it.

Request Correction of your personal data – The right to request correction of any incomplete or inaccurate data we hold about you.

Request Erasure of your personal data – The right to request we delete or remove personal data if there is no good reason for us to continue processing. You are also entitled to ask us to delete or remove personal data where you have exercised your right to objective to processing (below).

Restricting Processing your personal data – The right to ask us to suspend processing your personal information. For example, you may request processing be restricted while you establish accuracy of the information or reasoning for processing.

Object to Processing your personal data – The right to object to our processing of your personal information based on our (or a third party's) legitimate interest and you have reasons that make you want to object to processing on this ground. This also includes

objections to our processing to inform you of other roles where you may be a good candidate at Accordion.

Data Portability Rights – This only applies to the information you provided to us. You have the right to ask us to transfer this information to you or another organization.

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 data 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 the personal data that we hold about you, or we may have destroyed, erased, or anonymized your personal data in accordance with our data retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

11. **Your Right: Withdraw Consent**
    Where you have provided your consent to the collection, processing, use, and transfer of your personal data, you may have the legal right to withdraw your consent under certain circumstances. If you decide to withdraw your consent, we will stop processing your personal data for that purpose. To withdraw your consent, if applicable, contact us at **privacy@accordion.com.**

12. **How to Contact Us**
    We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice, how we handle your personal data, or would like to request access to your personal data, please contact us by writing to **privacy@accordion.com**.

13. **Changes to This Privacy Notice**
    We reserve the right to update this Privacy Notice at any time. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent only where required by applicable law or regulation.

ACKNOWLEDGEMENT OF RECEIPT

By selecting “Acknowledge/Confirm” on my job application, I give my explicit consent to Accordion to process my personal and sensitive personal data for the purposes described below. I understand each consent is separate, and I may withdraw my consent at any time by contacting **privacy@accordion.com**.

1. **Consent to Process Personal Data**
   I consent to Accordion collecting, storing, and using my personal data for the purposes of recruitment, assessing my suitability for employment, and complying with legal obligations. If I am subsequently employed by Accordion, I consent to my personal data being stored and processed for business purposes connected with my employment, as well as for compliance with applicable legal obligations.

2. **Consent to Process Special Category and Sensitive Data**
   I explicitly consent to Accordion collecting, storing, and using my special category personal data and sensitive data, where permitted by applicable laws, for the purposes connected with my recruitment and potential employment as outlined in this privacy notice.

3. **Consent to Automated Processing**
   I explicitly consent to my personal and sensitive personal data being subject to automated processing by Accordion where necessary for recruitment, workforce planning, or performance evaluation. I understand final decisions will be made by a human team member.