



JOOM, UNIPESSOAL LDA

Job Applicant Privacy Notice



Effective On:	January 15, 2024
Last Updated:	January 15, 2024
Review Frequency:	Annually

Job Applicant Privacy Summary

Table 1: Joom Job Applicant Privacy Summary

CONTACT INFORMATION	
 Our contact information	JOOM, UNIPESSOAL LDA Avenida Engenheiro Duarte Pacheco, No. 19, 1st floor, Santo Antonio, 1070-100 Lisbon privacy@joom.com
 Our Data Protection Officer (DPO) contact information	Data Protection Officer (DPO) Name: Oleg Blinov Phone: +49 1525 8116697 Email: ol.blinov@joom.com
GENERAL INFORMATION	
 Do we collect Personal Data?	YES. We may collect information like identifiers and job application-related information, such your name, your education and your job history. Please see Section 3 to read the all the categories of Personal Data we collect.
 How do we obtain your Personal Data?	Please see Section 4 to learn how we obtain your Personal Data.
YOUR PRIVACY RIGHTS	
 Can you request a copy of the Personal Data we have collected about you?	YES Please see Clause 7.1. to learn how to make this request.
 Can you request to have your Personal Data deleted?	YES Please see Clause 7.8. to learn how to make this request.
SECURITY	
 Do we protect your Personal Data?	YES Please see Section 8 to learn more about how we protect your Personal Data.

1. Introduction

JOOM, UNIPESSOAL LDA (“Joom”, “we”, “us”, “our”) takes the protection of the individuals applying for an open position at Joom (“**job applicants**”, “you”, “your”) personal information (“**Personal Data**”) very seriously. Please read this Job Applicant Privacy Notice (the “**Notice**”) to learn what Personal Data we collect about you in relation to processing your application and evaluating your suitability for employment with Joom, why and how we collect and use it, and with whom we might share it.

This Notice also informs you of your rights under the EU’s General Data Protection Regulation (“**GDPR**”), the Portuguese Law No. 58/2019 of 8 August and the Portuguese Labor Code No. 7/2009 (“**Portuguese Laws**”). Any terms defined in the GDPR and the Portuguese Laws have the same meaning as when used in this Notice.

If you have any questions about this Notice, please contact us by email at privacy@joom.com.

2. Scope

This Notice is designed to help you understand how we process your Personal Data when you submit an application for an open position at Joom. We process your Personal Data for the purposes of recruiting you, which is a process that involves but is not limited to assessing your suitability for an open position at Joom.

This Notice covers:

- The categories of Personal Data we collect
- Why we collect your Personal Data
- How we obtain your Personal Data
- With whom we share your Personal Data
- Your rights as they relate to your Personal Data, and how you can exercise those rights
- How we protect your Personal Data
- How to contact us



2.1. Joom’s Role as Data Controller

Within the scope of this Notice, Joom acts as a data controller for the Personal Data we collect or that others collect on our behalf. This means that we are responsible for determining the purposes and means of the processing of your Personal Data – in other words, how and why we collect, use, and share it.

2.2. Out of Scope of This Notice

This Notice applies only to the Personal Data collected by Joom as described in Section 3 Categories of Personal Data Collected.

This Notice does not apply to Personal Data we collect in other context, such as Personal Data related to our staff, our website, web applications, or mobile applications. For more information about our collection of Personal Data in other contexts, please see <https://www.joom.com/en/privacy>.



3. Categories of Personal Data Collected

The table below describes the categories of Personal Data we collect about you during the recruitment process:

Table 2: Categories of Personal Data Collected

Category	Personal Data We Collect
Identifiers	<u>Biographical information</u>, including but not limited to first name, middle name, last name, date of birth, passport number, or other identity documents, country and city of residence. <u>Contact information</u>, including but not limited to email address, residential address, phone number, other contact details (for example, social media which may be added by the applicant into his/her CV). <u>Application information</u>, including but not limited to the information included in an application form, CV and references.
Education information	<u>Information included in your application</u>, including but not limited to transcripts, diplomas, licenses, certifications, dates of attendance, concentrations, and degrees earned, work experience.
Professional or employment-related information	<u>Employment information</u>, including but not limited to position, company name, start date, end date, full time or part time, career history, training records.
Inferences drawn from other Personal Data	• <u>Opinions about the job applicant</u> • <u>Skills and behavior information</u> • <u>Cognitive and personality information</u>, including but not limited to test results from cognitive aptitude test and personality profile • <u>Background check information</u>, including but not limited to references provided by your former employer and colleagues you referred us to
Other types of Personal Data	Assessment and test results (for example: applicant personality profile), training results, complaints, recruiter's opinion of the applicant, referee's opinion of the applicant, interviewer's opinion of the applicant, background check information (referee's opinion of the applicant), licenses and

Category	Personal Data We Collect
	certifications, skills, behaviors, motivations, answers to specific questions (i.e. salary expectations, hourly rate).

We will not collect additional categories of Personal Data without informing you.



3.1. Exclusions to Personal Data

In reference to this Notice, Personal Data does not include de-identified or aggregated information.



3.2. Personal Data about Children Under the Age of 16

The recruitment process is not directed at children under the age of 16. Children under the age of 16 will not participate in the recruitment process.



4. Sources of Personal Data Collected

As part of our recruitment process, we need to collect and process Personal Data relating to our job applicants. We may obtain your Personal Data from the sources indicated in the table below:

Table 3: Sources of Job Applicant Personal Data

Category	Sources of the Personal Data
Identifiers	- You provide this data during the recruitment process. Examples could include when we collect Personal Data from application forms, CVs or resumes, your passport or other identity documents, or through interviews or other forms of assessment, including online tests. - Third parties, such as former employers, authorities, government entities, social networks, recruiters, your friends already employed by Joom, or other information providers, provide this data to us. - We obtain it from professional public social platforms. - Subject to applicable laws, we obtain this data through background checks and other similar information sources as required by law or deemed necessary due to the nature and security requirements related to the position in question.
Education information	You provide this data during the recruitment process.

Category	Sources of the Personal Data
	• Third parties, such as former employers, authorities, government entities, social networks, or other information providers, provide this data to us.
Professional or employment-related information	• You provide this data during the recruitment process. • Third parties, such as former employers, authorities, government entities, social networks, or other information providers, provide this data to us.
Other	• You provide this data during the recruitment process. • Third parties, such as former employers, authorities, government entities, social networks, or other information providers, provide this data to us.



5. Lawful Basis for Processing

The GDPR and Portuguese Laws require that we have a valid reason to use your Personal Data. This is called the "lawful basis for processing." We may process your Personal Data:

- Because you gave your consent.
- In order to enter a contract with you.
- Because we have a legitimate interest in processing your Personal Data and it is not overridden by your rights. In this case, our legitimate interest is evaluating your suitability for employment with Joom.
- Because we need to process your Personal Data in order to comply with the law.
- On another ground, as required or permitted by law.

When we rely on legitimate interests as a lawful basis of processing, you have the right to ask us more about how we decided to choose this legal basis, and you have the right to object to processing on this basis. To do so, please use the contact details provided in Clause 7.10.

Where we receive your Personal Data as part of the recruitment process based on a contract, we require such Personal Data to be able to carry out the contract. Without that necessary Personal Data, we will not be able to carry out the recruitment process.



5.1. How Joom Uses Your Personal Data

Joom may collect, use, or disclose your Personal Data for one or more of the following purposes:

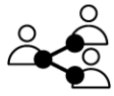
Table 4: Purposes for Collecting Job Applicant Personal Data

Category	Purposes for which we collect and use your Personal Data
Identifiers	• Recruiting purposes, such as conducting the recruitment process, assessing your skills and qualifications, arranging interviews or testing, and making hiring decisions • Communicating with you during the recruitment process • Deciding whether to offer you a job • Preparing the offer letter • Conducting background checks (inquiring references from your former employee and colleagues) • Dealing with legal disputes involving you • Preventing fraud or other criminal activity • Engaging in necessary precontractual activities or negotiations
Education information	• Recruiting purposes, such as conducting the recruitment process, assessing your skills and qualifications, arranging interviews or testing, and making hiring decisions • Conducting background checks (inquiring references from your former employee and colleagues) • Record keeping
Professional or employment-related information	• Recruiting purposes, such as conducting the recruitment process, assessing your skills and qualifications, arranging interviews or testing, and making hiring decisions • Conducting background checks (inquiring references from your former employee and colleagues) • Record keeping
Other	• Recruiting purposes, such as conducting the recruitment process, arranging interviews or testing, and making hiring decisions • Talent management • Defense of Joom in the event of legal proceedings



5.2. Automated Decision-Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making. There will always be human intervention into decisions based on automated processing, including automated profiling. If this position changes, or there is a need and lawful basis to do so, we will inform you.



6. Sharing of Personal Data Collected

6.1. Overview of Data Sharing Practices

Joom may share Personal Data with third parties, such as its affiliates and service providers that process Personal Data on our behalf to assist us in operating our recruitment process. However, these third parties must enter strict data processing agreements with Joom to ensure that they keep your Personal Data confidential and only use it for the services they provide Joom during the recruitment process. They therefore must treat your Personal Data with the same level of protection that we do.

Joom may also disclose Personal Data when required by law or in good-faith belief that a disclosure is necessary to comply with official investigations or legal proceedings (whether initiated by government or law enforcement officials or private parties). If required to disclose your Personal Data to government or law enforcement officials, Joom may not be able to ensure that those officials will maintain the privacy and security of your Personal Data.

We may also disclose your Personal Data if we sell or transfer all or some of our company's business interests, assets, or both, and in connection with a corporate restructuring.

6.2. Types of Third Parties that Process Your Personal Data

The following table describes the categories of Personal Data we may disclose to third parties, and the categories of those third parties.

Table 5: Third Parties Receiving Personal Data

Category	Categories of Third Parties Receiving Personal Data
Identifiers	• Human resources information system software and services • Data storage and IT service providers • Background screening solutions • Recruitment IT services • Joom intra-group entities
Education information	• Background screening solutions • Data storage and IT service providers • Human resources information system software and services • Recruitment IT services • Joom intra-group entities
Professional or employment-related information	• Background screening solutions • Data storage and IT service providers • Human resources information system software and services • Recruitment IT services • Joom intra-group entities
Other	• Background screening solutions

Category	Categories of Third Parties Receiving Personal Data
	• Data storage and IT service providers • Human resources information system software and services • Recruitment IT services • Joom intra-group entities



6.3. Transfers of Personal Data Outside the European Economic Area

Some of the entities we may send Personal Data to are located outside of the European Economic Area (“EEA”). In some cases, the European Commission may have determined that the data protection laws of some countries provide a level of protection equivalent to EU law. To see the list of countries that the European Commission has recognized as providing an adequate level of protection to Personal Data please visit [this page](#).

Joom will only transfer the Personal Data out of the EEA to countries that have not been recognized as providing an adequate level of protection to Personal Data by using appropriate transfer mechanisms such as the [European Commission approved standard contractual data protection clauses](#) under Article 46.2 of the GDPR. We typically transfer Personal Data to Russia and the United States, where some of our service providers are established.



6.4. Retention of Your Personal Data

When you accept a job offer at Joom, the Personal Data we process will be included as part of your ongoing employment record.

We retain your Personal Data for as long as necessary to fulfil the purposes it is collected for, unless a longer retention period is required or permitted by law, including for the purposes of satisfying any legal, accounting, or reporting requirements, or any other lawful legitimate purposes.

If you do not receive or accept a job offer from Joom, we will retain your information for a period of twelve (12) months from the date of our last communication about the job position you were considered for.

When the purposes of processing are satisfied, we will delete your Personal Data in accordance with our data retention policy and applicable laws and regulations.



7. Your Privacy Rights

You have specific rights regarding your Personal Data. This section describes your rights, and how you can exercise those rights.



7.1. Your Right to Know What Personal Data We Have About You

This is called the right of access, meaning you can request that we disclose certain information to you about our collection and use of your Personal Data.

Once we confirm it was you or your authorized agent (please see para 7.10.1.) who made the request, we will disclose to you:

- The categories of Personal Data we have collected about you;
- The categories of sources for the Personal Data we collect about you;
- Our purposes for processing your Personal Data;
- The categories of third parties with whom we share your Personal Data;
- The specific pieces of Personal Data we have about you;
- If we rely on legitimate interests as a lawful basis to process your Personal Data, the legitimate interests pursued; and
- The appropriate safeguards for transferring data from the EEA to a third country.

Please take into account that the GDPR allows us not to satisfy your access request when:

- you already have the information;
- providing such information proves impossible or would involve a disproportionate effort, or in so far providing such information is likely to render impossible or seriously impair the achievement of the objectives of that processing; and
- that Personal Data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy.



7.2. Your Right to Know What Happens to Your Personal Data

This is called the right to be informed. It means that you have the right to obtain from us all information about our data processing activities that concern you, such as how we collect and use your Personal Data, how long we will keep it, and who it will be shared with, among other things. We are informing you of how we process your Personal Data with this Notice.



7.3. Your Right to Correct Your Personal Data

This is called the right to rectification. It gives you the right to ask us to correct anything that you think is wrong with the Personal Data we have on file about you and to complete any incomplete Personal Data.

7.4. Your Right to Change How We Process Your Personal Data



This is called the right to restrict processing, which means you have the right to request that we only use or store your Personal Data for certain purposes.

You have this right in certain occasions, such as where you believe the data is inaccurate or the processing activity is unlawful. This right enables you to ask us to suspend the usage of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.



7.5. Your Right to Ask Us to Stop Using Your Personal Data

This is called the right to object, which means that you can request that we stop using your Personal Data. You have this right where we rely on a legitimate interest of ours (or of a third party).



7.6. Your Right to Port or Move Your Personal Data

This is called the right to data portability. It is the right to ask for and download Personal Data about you that you have given us or that you have generated by virtue of your participation in the recruitment process, so that you can:

- move it;
- copy it;
- keep it for yourself; or
- transfer it to another organization.

We will provide your Personal Data in a structured, commonly used, and machine-readable format. When you make a data portability request electronically, we will provide you a copy in electronic format.



7.7. Your Right to Withdraw Your Consent

As discussed in Section 5 Lawful Basis for Processing, the GDPR and Portuguese Laws require that we clarify the basis we use for processing Personal Data. If the basis for processing was your consent, you have the right to withdraw this consent. If you withdraw your consent, Joom's use of your Personal Data before this withdrawal is still lawful.



7.8. Your Right to Have Your Personal Data Deleted

This is called the right to erasure, right to deletion or the "right to be forgotten". This right means you can ask for your Personal Data to be deleted. If that is the case, we will consider if we can limit how we use it. There may also be circumstances where we deny your request to delete your information under applicable law, such as if we or our third party service providers need to retain the Personal Data to:

- a) complete the recruitment process;
- b) provide a service that you requested that is linked to the recruitment process;
- c) take actions reasonably anticipated within the context of our ongoing relationship with you, or otherwise perform a contract with you that is linked to the recruitment process;
- d) detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- e) debug products to identify and repair errors that impair existing intended functionality;
- f) enable solely internal uses reasonably aligned with your expectations based on your relationship with us during the recruitment process;
- g) make other internal and lawful uses of that information that are compatible with the context in which you provided it.



7.9. Your Right to Lodge a Complaint with a Supervisory Authority

You have the right to lodge a complaint with a supervisory authority if you are not satisfied with how we process your Personal Data.

In Portugal you can lodge a complaint with the Commission Nacional de Protecção de Dados, with its website accessible at <https://www.cnpd.pt>.



7.10. Exercising Your Privacy Rights

To exercise any of the rights described in this section, please submit a request by the **emailing us** at privacy@joom.com.



7.10.1. Verification of Authority

If you are submitting a request on behalf of somebody else, we will need to verify your authority to act on behalf of that individual. When contacting us, please provide us with proof that the individual gave you signed permission to submit this request, with a valid power of attorney on behalf of the individual.

Alternatively, you may ask the individual to directly contact us by using the contact details above to verify their identity with us and confirm with us that they gave you permission to submit this request. We will only use the Personal Data you provide us in a request to verify your authority.



7.11. Verification of Your Identity to Respond to Your Privacy-Related Request

To evaluate your privacy rights requests, we need to confirm that you made the request. Consequently, we may require additional information to confirm that you are who you say you are.

We will only use the Personal Data you provide us in a request to verify your identity.



7.12. Format and Timing of Our Response to Your Privacy-Related Request

We will confirm the receipt of your request within ten (10) days and, in communication, we will also describe our identity verification process (if needed) and when you should expect a response, except when we have already granted or denied the request.

Please allow us up to thirty (30) days to reply to you from the day we received your request. If we need more time (up to ninety (90) days in total), we will inform you of the reason why, and the extension period, in writing.

We will not charge a fee for processing or responding to your requests unless we determine that your request is excessive, repetitive, or manifestly unfounded. In those cases, we will tell you why we made that determination and provide you with a cost estimate before completing your request.



8. How We Protect Your Personal Data

We are strongly committed to keeping your Personal Data safe. We have implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect your Personal Data from unauthorized processing. Unauthorized processing includes unauthorized access, exfiltration, theft, disclosure, alteration, or destruction. Some of those measures include encryption and redaction, and we also have dedicated teams to look after information security and privacy.



9. Contact Us

If you have any questions or comments about this Notice, how we collect and use your Personal Data, your choices and rights regarding such use, or if you wish to exercise your privacy rights, please contact us by sending an email to privacy@joom.com or contacting our Data Protection Officer at ol.blinov@joom.com.



10. Changes to This Notice

If we make any material change to this Notice, we will post the revised Notice to this webpage. We will also update the “Effective” date. By continuing to participate in the recruitment process after we post any of these changes, you accept the modified Notice.

11. Icons Used in This Notice

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