

# Global Candidate Privacy Policy

Last updated 20 February 2023

## 1. Purpose of this Policy

Thank you for entrusting Move Fast, LLC, and our subsidiary Most Fast Limited (both collectively “**most**”, “we”, “us”, or “our”) with your personal information. We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law.

This Global Candidate Privacy Policy explains what information we collect about you during the application or recruitment process for employment with Move Fast LLC or Most Fast Limited, as well as the purposes for which we collect and use that information.

For the purposes of this policy:

“**Candidate**” includes applicants and candidates who are part of an application or recruitment process for Move Fast LLC or Most Fast Limited; and

“**Candidate Personal Information**” refers to any information we collect about one of our Candidates during the application or recruitment process which could, alone or together with other information, personally identify them or otherwise be reasonably linked or connected with them.

## 2. Additional Policies

This Policy does not apply to

Engagement with the **most** website (“**Site**”) at [www.most.io](http://www.most.io). Our separate **Site Privacy Policy** describes how we might process your personal information and also outlines your rights arising from Data Protection Regulations with respect to such processing.

Engagement with **most** in a business to business capacity other than via the Site, as a supplier, potential client, or other interested party. Our separate **Business to Business (“B2B”) Privacy Policy** describes how we might process your personal information and also outlines your rights arising from Data Protection Regulations with respect to such processing.

## 3. How to contact us

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by sending an email to: [dataprivacy@most.io](mailto:dataprivacy@most.io)

#### 4. What personal information do we collect from you ?

The Candidate Personal Information we collect, use, and maintain (or “**process**”) can include the following, but is not limited to:

- ❖ Identification and contact information, including your name, address, email address, phone number and other contact information.
- ❖ National identifiers, such as your citizenship status, residency and work permit status and your national ID/passport, social security number (s) if specifically later requested by us.
- ❖ Employment and education history, such as your resume or CV with previous employers and job titles/positions, cover letter, details of how you heard about the position you are applying for, academic/professional qualifications.
- ❖ Previous applications/roles with **most**.
- ❖ Professional or employment information, including your desired salary or terms related to benefits, willingness to relocate, other job preferences.
- ❖ Details of your nominated referees (including their name, contact details, employer and job role).
- ❖ CCTV/Building access control – for the purposes of any visit to a **most** premises (e.g. for interview), please note that we may deploy CCTV and/or building access controls (which involve the processing of CCTV images and/or other personal information such as visitor name and time of access to the building) for security and law enforcement purposes, to establish, exercise or defend our legal rights and/or to protect the vital interests of any person.
- ❖ Other information you voluntarily provide throughout the process, including through assessment centres / exercises and interviews.

#### 5. What personal information do we collect from other sources ?

We may collect personal information other than directly from you, for example:

- ❖ Information provided by recruitment or executive search agencies.
- ❖ References provided by referees.
- ❖ Other background information provided or confirmed by academic institutions and training or certification providers.
- ❖ Criminal records data obtained through criminal records checks where justified for the role (in countries where such checks are permitted by law and are carried out).
- ❖ Information provided by background checking agencies and other external database holders (for example credit reference agencies and professional / other sanctions registries if justified for the role and as permitted by applicable law).
- ❖ Information collected from publicly available sources, including any professional social media platforms you use or other relevant information available online.
- ❖ From other **most** group companies for the purposes outlined in this Global Candidates Privacy Policy.

## 6. How do we use the Candidate Personal Information we collect ?

We collect and use Candidate Personal Information for the following purposes:

- ❖ To assess your skills, qualifications and interests for employment opportunities, including the role applied for with us;
- ❖ To verify the information provided by you or others, including checking your references;
- ❖ To communicate with you about your application and the recruitment process, setting up interviews. including informing you of other potential employment opportunities at **most**
- ❖ If you were referred, to inform the referrer of the status of your application;
- ❖ If you are offered a position, to prepare your offer letter and conduct a background check (to the extent permitted by applicable law);
- ❖ If you are offered a position and where requested by you, to assist you with obtaining an immigration visa or work permit;
- ❖ To comply with local laws, regulations, legal processes or enforceable government requests; and
- ❖ To prepare and submit reports as required under local laws and regulations;
- ❖ To manage and improve our application and recruitment process (such as making the application process more efficient and improving our diversity practices).

### Successful Applications

If you are accepted for a role at Move Fast LLC or Most Fast Limited, the information collected during the recruitment process will also be used to assist with the process of on-boarding (including establishing systems access and preparing for induction), will form part of your ongoing staff member record (where relevant to the ongoing employment relationship). Your personal information processed thereafter for the duration of employment is covered by our Employee Privacy Policy.

### Unsuccessful Applications

If your application is unsuccessful, we will add your personal information to our talent pool for the purposes of creating a profile about you within such talent pool. We may combine the personal information you provide to us with information obtained from third party sources, including publicly available sources for such purposes (e.g., publicly available platforms on which you publish a professional profile).

We will retain this profile information for a six month period to identify job opportunities for which you may be suitable from time to time and to contact you about such opportunities (and to ensure that we do not contact you again in relation to the same or similar roles).

You can opt out of your inclusion in the talent pool at any time by contacting the email address [dataprivacy@most.io](mailto:dataprivacy@most.io). If required by law, we will obtain your consent before including your personal information in the talent pool.

## 7. Who do we share your personal information with

We take care to allow access to personal information only: (i) to those who require such access to perform their tasks and duties; (ii) in the other circumstances described below in this section. We will never sell your personal data to any third party.

We do not allow our third party service providers to use your data for their own purposes. We only permit them to process it for specified purposes and in accordance with our instructions, and they are required to keep it confidential and according to our legal and regulatory obligations.

### Transfers to other group companies

We may share your personal information between both legal entities of **most** for processing in accordance with the purposes set out in this Global Candidate Privacy Policy.

### Transfers to third party service providers

We may make certain personal information available to third parties who provide services relating to the recruitment process to us, including:

- ❖ in-country recruitment or executive search agencies involved in your recruitment.
- ❖ in-country background checking or other screening providers and relevant local criminal records checking agencies (where relevant).
- ❖ IT service providers, i.e., data storage, IT applications/tools providers, IT developers and support providers and providers of hosting services in relation to our careers website.

Further information about our group companies and about the IT service providers that may process your personal information (and their locations) can be provided on request by emailing [dataprivacy@most.io](mailto:dataprivacy@most.io). These service providers may change over time, but we will always seek to ensure that any third parties who handle your personal information will do so in a manner consistent with this Global Candidate Privacy Policy and in accordance with applicable data protection law.

**Other Third Party Transfers.** We may share or transfer your personal data in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## 8. How long do we retain your Candidate Personal Information for ?

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Global Candidate Privacy Policy or as otherwise required by applicable law.

If your application is unsuccessful and you do not opt-out of inclusion of your personal information in our talent pool, we will keep your profile information for 12 months from the date that you submitted your application (or the latest update of your details by you). Prior to deleting your profile information, we may send you a reminder to give you an option to

keep your personal information in our talent pool after the above period. If you agree, we will keep your personal information for an additional (six) 6-month period. If required to do so under applicable law in a particular country, we will obtain your explicit consent to inclusion of your details in the talent pool.

Where we undertake vetting for certain positions (where permissible and in accordance with applicable law), we will destroy the information obtained by a vetting exercise as soon as possible, or in any case, within 12 months (retaining only a record of the result).

In general, we will not hold recruitment records beyond the statutory period in which a claim arising from the recruitment process may be brought unless there is a clear business reason for exceeding this period.

## **9. How do we keep your information safe ?**

We implement appropriate technical and organisational security measures to safeguard the personal information we collect and process about you against loss and unauthorised alteration or disclosure. We use role-based access controls to limit access to your personal information on a strict need-to-know basis consistent with the purposes for which we have collected such information. We use appropriate anti-malware and intrusion detection systems to guard against unauthorised access to our network, and we have an incident response plan in place to quickly respond to any suspected leak or breach of personal information.

## **10. What are your privacy rights**

We will consider and act upon any request in accordance with applicable data laws.

In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have certain rights under applicable data laws.

These may include the right (i) to request access and obtain a copy of your personal information; (ii) to request correction or deletion of your personal information; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you also have the right to object to the processing of your personal information. You can make such a request by contacting us at [dataprivacy@most.io](mailto:dataprivacy@most.io)

If you are located within the UK, Switzerland, or EEA and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority.

**Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us at [dataprivacy@most.io](mailto:dataprivacy@most.io)

## **11. Do we make updates to this Privacy Policy**

We may update this Global Candidate Privacy Policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible.

## **Appendix for Candidates in the EEA**

If you are a candidate in the EEA applying for a position within Most Fast Limited or Move Fast LLC, Most Fast Limited will be the controller of your data for the purposes of your application, administration, resource management, etc.

### **Legal Basis, Data Protection Rights and Contact**

We use a combination of legitimate interests, performance of a contract (including the intention to enter into a contract) and/or consent as the legal basis to process the personal information that you share with us as part of the recruitment process.

Candidates in the EEA can object to processing of their personal information, ask us to restrict processing of their personal information or request portability of their personal information.

Where consent to the use of personal information has been obtained, it can be withdrawn at any time with future effect. Withdrawing consent will not affect (1) the lawfulness of any processing we conducted prior to the withdrawal, or (2) processing personal information under other legal bases.

If you believe we are using your personal information in a way that is inconsistent with this Global Candidate Privacy Policy or for more information about your rights, contact your local data protection authority.

If you have questions, concerns or wish to make a request relating to any of the information in this Appendix, please contact us at [dataprivacy@most.io](mailto:dataprivacy@most.io)