

Candidate Privacy Notice

At JustMarkets, we are committed to being transparent about how we process and protect your personal data. Below, you can find information on why JustMarkets (“we,” “us,” “our”) processes your personal data, the types of personal data we process, and who has access to your personal data. It also describes how the information will be used, how you can control the collection, correction, and/or deletion of your information, and how to get in touch with us if you need assistance. Our privacy practices are designed to provide a high level of protection for your personal data. We will not use or share your information with anyone except as described in this Candidate Privacy Notice. Please read this Notice carefully to understand our views and practices regarding your personal data before browsing this website.

1. Introduction and definitions

1.1. This Candidate Privacy Notice (“Notice”) applies to the JM Technologies Ltd and our subsidiaries and affiliated companies acting on our behalf (collectively “JustMarkets” or “Company”), and describes how Company collects, processes, and discloses personal data from you through the JustMarkets Careers website (“Site”) and/or through other means during your application process.

1.2. This Notice does not cover use of personal data collected about you as a consumer through the JustMarkets network of websites, as well as apps, features, services and events provided by JustMarkets (“Services”).

1.3. This Notice does not form part of any offer of employment or any contract of employment, and does not provide any contractual right on you or place a contractual obligation on JustMarkets.

1.4. The data controller for Personal Information collected during the recruitment process is the JustMarkets company in your jurisdiction to whom you submit your application. If you are unsure as to which JustMarkets company is applicable to you, please contact us (please refer to the contact email provided in Section 10).

1.5. This Privacy Notice applies to you as a candidate currently engaged in the recruitment process with us, whether for a position as an employee, worker, or contractor. Its purpose is to inform you about how and why your personal data is collected, used, and stored in connection with our recruitment procedures. It also outlines the types of personal data we typically process and provides you with key information required under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

1.6. In certain circumstances, local laws and regulations governing the processing of Personal Information may impose stricter requirements than those outlined in this Notice. Where such laws apply, the more restrictive provisions will prevail. Where required by local legislation, JustMarkets will provide you with additional privacy notices or relevant information. This Notice may also be supplemented periodically with more specific privacy-related details or notices, as applicable.

2. Data Protection Principles

2.1. We are committed to complying with applicable data protection laws and principles. This means that your personal data will be processed in accordance with the following principles:

2.1.1. **Lawfulness, fairness, and transparency:** your personal data will be processed lawfully, fairly, and in a transparent manner, in relation to the purposes for which it was collected.

2.1.2. **Purpose limitation:** personal data will be collected for specified, explicit, and legitimate purposes, and will not be further processed in a manner incompatible with those purposes.

2.1.3. **Data minimisation:** we will collect only the personal data that is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

2.1.4. **Accuracy:** personal data will be accurate, and where necessary, kept up to date. We will take reasonable steps to ensure that inaccurate data is erased or corrected without delay.

2.1.5. **Storage limitation:** personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected in accordance with our retention policy.

2.1.6. **Integrity and confidentiality (security):** personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, as well as against accidental loss, destruction, or damage, using appropriate technical and organisational measures.

3. Type of Information we collect from you

3.1. Subject to applicable law, we may collect the following categories of personal information from you through the application and recruitment process:

3.1.1. Identifiers and Contact Information.

In connection with your application, we collect and process personal identifiers and contact details, including information provided in your curriculum vitae (CV). This may include, but is not limited to, your full name, email address, mailing address, telephone number, photograph (if submitted), and the contact details of any professional or personal references. This information is processed for the purposes of assessing your suitability for the role, communicating with you throughout the recruitment process, and complying with applicable legal and regulatory obligations.

3.1.2. National Identifiers and Work Eligibility Information.

Depending on your country of residence and in accordance with applicable laws, we may collect and process certain national identifiers and information related to your eligibility to work. This may include your government-issued identification number, citizenship status, residency status, work permit details, and other immigration-related information. Such data is collected solely for the purpose of verifying your right to work and fulfilling legal or regulatory obligations, and only to the extent permitted by applicable law.

3.1.3. Employment history and background check information.

We collect and process employment-related information as part of the recruitment process, including details contained in your CV, your work history, professional background, and any other necessary information revealed during background screenings. Such data will be processed solely for the purpose of assessing your suitability for the role and ensuring compliance with legal or regulatory obligations.

3.1.4. Academic and Professional Qualifications.

We may collect documentation submitted in support of your application, including but not limited to academic transcripts, diplomas, certificates, professional licenses, and assessment or examination results. This information is used to verify qualifications relevant to the position for which you are applying.

3.1.5. Voluntary Disclosures and Other Application-Related Information.

We may collect and process any information that you voluntarily disclose during the application or interview process, including responses to interview questions, assessments, statements of motivation, expectations, or other information provided through forms, communications, or interactions with our recruitment team

3.2. Your primary choice with respect to this type of personal data is simply not providing it, such as by not submitting a job application to JustMarkets. For additional information regarding your data

protection rights and available choices, please refer to Section 5 of this Notice.

4. Personal Data Usage and Legal Grounds

4.1. We process your personal information as part of our recruitment practices, in accordance with applicable data protection laws. This processing is necessary for assessing your qualifications, evaluating your suitability for current or future job opportunities, and communicating with you throughout the recruitment process. We also process your information to ensure compliance with legal, regulatory, or contractual obligations.

4.2. Lawful Basis for Processing Personal Information.

4.2.1. In accordance with applicable data protection laws, our lawful basis for collecting and using the personal information described in this Notice will depend on the specific type of information and the context in which it is collected or used. Depending on the jurisdiction in which you reside, there may be other lawful bases for processing your personal information that are not outlined here.

4.2.2. We generally rely on our legitimate interests as the basis for processing your personal information, provided that such interests are not overridden by your data protection rights and freedoms. This includes processing necessary for activities such as: a) communicating with you; b) evaluating your application; c) managing our recruitment processes in an efficient and fair manner. In certain situations, we may be required to process your personal information in order to comply with legal obligations, such as those related to employment or works council laws, or to protect your vital interests or those of another individual. Additionally, there may be cases where we seek your explicit consent to process your information for a specific purpose.

4.2.3. When processing sensitive personal information (as defined by applicable laws), we ensure that one of the lawful bases for processing such data is met. This includes, but is not limited to: a) your explicit consent; b) processing necessary to fulfill our obligations under employment law; c) processing data that you have made publicly available (e.g., information you provide about health conditions); d) processing necessary for the establishment, exercise, or defense of legal claims.

4.3. We may aggregate or de-identify the information we collect for purposes such as research and recruitment. For example, we may generate reports in an aggregated, de-identified, or anonymized form. Once the data is anonymized and no longer qualifies as personal data under applicable laws, this Notice will no longer apply.

4.4. If you fail to provide the necessary information when requested, such as qualifications or work history, which is essential for the evaluation of your application, we will be unable to proceed with processing your application. The provision of such information is required to assess your eligibility for the position in accordance with the purposes outlined in this Notice.

4.5. If you have any questions or require more information about the lawful bases on which we collect, use, store, or otherwise process your personal data, please reach out to us as provided in Section 10.

5. Disclosure of Personal Information

5.1. In compliance with applicable laws, and with consent where necessary, we may disclose personal information as outlined in paragraphs 5.1.1. - 5.1.6.:

5.1.1. Internal Use. Your personal information may be disclosed to personnel involved in the recruitment and hiring processes, including but not limited to the Human Resources department or to third-party administrators, for purposes related to recruitment or other legitimate business activities associated with the hiring process.

5.1.2. Service Providers. We may disclose your personal information to third-party service providers

who assist in delivering services, including but not limited to recruitment, talent acquisition, administration and the recruitment systems we utilize. Such disclosures will be made in accordance with formal agreements with our service providers, which ensure the protection, confidentiality, and proper handling of your personal information in compliance with applicable laws and regulations.

5.1.3. Affiliates. We may disclose your personal information to affiliates under common ownership or control of JustMarkets for purposes related to recruitment, candidate evaluation, resource planning, talent management in accordance with applicable legal requirements and for legitimate business purposes related to general business operations.

5.1.4. Public or Government Authorities. We may disclose your personal information to comply with legal obligations, regulations, or contracts, or in response to a court order, administrative process, subpoena, government audit where required by law.

5.1.5. Exercising Legal Rights. We may disclose certain personal information as necessary to seek legal advice from external counsel.

5.1.6. Corporate Transactions. We may disclose or transfer your personal information to relevant third parties in connection with, or as part of, the due diligence process for any reorganization, merger, consolidation, or other business transaction, including bankruptcy or similar proceedings with further notification provided regarding any changes in control over your personal information and the options available to you.

5.2. Nevertheless, as stated in paragraph 5.1, we may still disclose your personal information in other instances where you have provided explicit consent or requested such disclosure.

6. Data Security

6.1. We have implemented appropriate security measures to prevent accidental loss, unauthorized use, access, alteration, or disclosure of your personal information. Additionally, access to your personal data is restricted to employees, agents, contractors, and third parties who require it for legitimate business purposes. These individuals are obligated to handle your personal information strictly in accordance with our instructions and are bound by confidentiality obligations. We have established procedures to address any suspected data security breaches and will notify you and the relevant authorities in the event of a suspected breach, as required by law.

7. Retention of Personal Information

7.1. Your personal information will be retained only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by applicable law. The length of time we retain your personal information is based on the purposes for which it was collected, its intended use, and any legal obligations we are required to comply with, as outlined in our records retention policy and data handling standards.

7.2. In the event that your application is successful and you accept our offer, certain personal data collected during the recruitment process will be incorporated into your records and retained in compliance with applicable privacy legislation. The retention of your personal information will be managed within the platform designated for this purpose, in accordance with the privacy policies governing JustMarkets employees and staff.

7.3. If your application for employment is unsuccessful, we will retain your personal data for up to 24 months from the date of final decision, after which it will be securely deleted, unless you have provided explicit consent for us to retain your data for the purpose of being considered for future employment opportunities. In such cases, we will retain your data in accordance with your consent and will seek to renew your consent at 24-month intervals, using the contact details you have

provided. You may withdraw your consent at any time as provided in Section 10.

7.4. Upon receipt of a request to delete an individual's personal registration, JustMarkets will ensure that your personal record is deleted within 30 days. After this period, we will securely dispose of your personal data in line with our data retention policy, unless the law or other regulations mandate its preservation. In certain cases, we might anonymize your personal data (so it's no longer tied to you) for research or statistical purposes.

8. Your Privacy Rights

8.1. Subject to applicable data protection laws, including the GDPR where applicable, you have the following rights in relation to your personal data:

8.1.1. **Access Request:** you have the right to request access to your personal data (commonly referred to as a "data subject access request"). This allows you to obtain confirmation of whether we are processing your personal data and, where applicable, receive a copy of such data along with additional information on how it is processed.

8.1.2. **Correction Request:** you can request the correction of any personal information we hold about you. This allows you to rectify any incomplete, inaccurate or outdated details we possess.

8.1.3. **Erasure Request.** you have the right to request the erasure of your personal data where there is no legitimate basis for its continued processing, including in cases where you have exercised your right to object to such processing.

8.1.4. **Objection Request:** you have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis, and your particular situation gives rise to grounds for such objection. You also have the absolute right to object to processing where your personal data is used for direct marketing purposes.

8.1.5. **Restriction Request:** you can request the restriction of processing of your personal information. This enables you to ask us to halt the processing of your data, especially if you want us to verify its accuracy or the purpose of processing.

8.1.6. **Data Transfer Request:** you have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to have that data transmitted to another data controller where technically feasible and where processing is based on consent or the performance of a contract.

8.2. If you wish to exercise any of your data protection rights, such as requesting access to your personal data, correcting inaccurate or incomplete information, requesting erasure, restricting or objecting to processing, or requesting the transfer of your data to another controller (data portability), you may contact us as provided in Section 10. We will respond to your request in accordance with all applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR), and any other relevant regional or national legislation. Please note that we may require you to verify your identity before processing your request.

8.3. If you are dissatisfied with how we have handled your personal data, you have the right to lodge a complaint with your local data protection authority. For EU residents, please contact your local Data Protection Authority (further information is available at <http://www.dataprotection.gov>).

9. Data Security

9.1. We implement appropriate technical and organizational measures to safeguard your personal information against accidental loss, unauthorized access, use, alteration, or disclosure. Access to your personal data is limited to those employees, agents, contractors, and third parties who have a legitimate business need to know. Such individuals and entities are subject to strict contractual

confidentiality obligations and are required to process your personal data only in accordance with our instructions.

9.2. We have also established incident response procedures to detect, investigate, and address any suspected personal data breaches. Where required by applicable data protection laws, we will notify you and the relevant supervisory authority of any such breach without undue delay.

10. Contact Us

10.1. If you have any questions regarding this Privacy Notice, or if you wish to raise a concern or lodge a complaint about how we handle your personal data, please contact us at dpo@justmarkets.com. We are committed to addressing your inquiries in a timely and transparent manner, and where applicable, in accordance with relevant data protection legislation.

11. Changes to This Privacy Notice

11.1. We may update or amend this Notice from time to time to reflect changes in our practices, applicable laws, or regulatory requirements. Any revisions will be posted on this page, and each version will be identified by its effective date at the top. We encourage you to review this Notice periodically to remain informed about how we process your personal information.

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