

# **\*\*CANDIDATE PRIVACY POLICY\*\***

## **\*\*ABOUT THIS POLICY\*\***

This Privacy Policy ("Policy") describes how Remitly and its affiliates/subsidiaries (collectively "Remitly") collect, use, disclose, and otherwise process the personal data ("Candidate Data") of individuals who apply or are considered for a position with Remitly ("Candidates").

This Policy governs Remitly's processing of Candidate Data anywhere in the world in connection with our recruitment of Candidates for positions at Remitly.

## **\*\*WHO ARE WE?\*\***

Any Candidate Data collected, used, disclosed, and otherwise processed by Remitly is controlled by the applicable Remitly affiliate based upon the applicable Remitly entity you are applying to. Please see the "Our Relationship with You" section of this Policy to determine which entity controls the collection and use of your personal data.

## **\*\*WHAT PERSONAL DATA DO WE COLLECT?\*\***

We collect the following categories of Candidate Data directly from you:

- name, address, email address, telephone number, or other contact information;
- resumes/CVs, cover letter, academic transcripts, and other statements of experience and education;
- the position(s) for which you wish to be considered, desired salary, willingness to relocate, and other job preferences;
- how you heard about the position;
- prior employers, dates of employment, positions held and/or job titles;
- name and contact information for references (it being solely your responsibility to obtain consent from references before providing their personal data);
- any other personal data that you provide during the job search, application, or interview process with Remitly, including medical/disability, information submitted in connection with skills assessments, additional information regarding work or educational experiences, information about employment offers from other companies, and reason(s) for acceptance/rejection;
- If we ask you to perform any form of testing, the details and results of these tests.

We may also receive the following categories of information about you from other

sources:

- where permitted by law, background check data, potentially including your criminal history records;
- information concerning your prior employment, including (where permitted by applicable law) compensation and your educational and academic degrees, from employment agencies, publicly available sources, social media websites, former employers and/or educational institutions;
- information provided by references that you provide.

In addition, if you apply for a position in the United States, or in another country that permits such voluntary data collections, you will have the opportunity to provide information about your gender, race/ethnic origin, disability status, and/or veteran status in order for us to conduct equal opportunity monitoring. Where permitted by law, we may also infer some of this information for past Candidates in order to improve our recruitment process. The provision of this information is entirely voluntary, and where required by law (including in the European Economic Area (“EEA”)), we only collect such information with your express consent. If you decline to provide this information, your application(s) will not be affected in any way. If you choose to provide this information, you consent to our using it for equal employment opportunity monitoring purposes. This information will not be used to evaluate your application for employment.

## **\*\*IF YOU DECLINE TO PROVIDE PERSONAL DATA\*\***

If you fail to provide requested information, which is necessary for us to consider your application for the role, we will not be able to process your application successfully. When you decide to provide us with additional personal data (e.g. your image, additional information about you or sensitive personal data) and consent to their processing, we will process such personal data based on your consent. You should remember that if you are asked for the consent to personal data processing, such consent is always voluntary, and may be withdrawn at any time, without affecting the lawfulness of processing based on the consent before its withdrawal. The same applies, if you wish to consent to processing your data for the purpose of future recruitment processes.

## **\*\*HOW DO WE USE YOUR PERSONAL DATA?\*\***

Remitly uses Candidate Data in connection with our Candidate recruitment process. Based on the requirements of labour laws, our necessity to take action at your request, or our legitimate interest, we process Candidate Data to:

- Assess your skills, education, qualifications, experiences, and suitability for the role you are applying
- Communicate with you about the recruitment process, inform you of potential

career opportunities

- Keep records related to our hiring processes
- Comply with legal and/or regulatory requirements, as applicable
- Pursue and defend against claims, in case of any misunderstanding between you and Remitly
- Determine whether to enter into a contract of employment or services with you
- Prepare offers of employment, including as it relates to compensation
- Perform pre-employment background checks, where legally permitted
- Provide any necessary accommodations during the recruitment process

We will use the personal data we collect about you on the basis of your consent:

- to process additional data or sensitive data, if you share it with us
- to carry out background and reference checks, where applicable in recruitment processes
- for other similar positions at Remitly, if you give us permission to put your data in our database of candidates for future work.

If you are hired, Remitly will maintain your Candidate Data as part of your employee records.

If you are not hired for the role for which you were initially considered, we may use your Candidate Data to identify and contact you regarding other positions for which you may want to be considered. If you do not wish for Remitly to use your data for this purpose, you may request that we delete your Candidate Data as explained in this Policy.

### *Automated Decision Making*

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## **\*\*WHO DO WE SHARE YOUR PERSONAL DATA WITH?\*\***

We will only share Candidate Data with:

- Remitly subsidiaries or affiliates;
- Service providers, consultants, or other vendors who need access to the data

to perform work related to the recruitment or hiring process on our behalf;

- If applicable, the employment or recruitment agency used in connection with the role;
- Law enforcement officials, government authorities, or other third parties if we believe it is required by applicable law, regulation, operating agreement, legal process such as subpoenas or court orders, or governmental request, if we believe your actions are inconsistent with our policies, or if we believe such sharing is necessary to protect the rights, property, or safety of Remitly or others.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **\*\*TRANSFERRING PERSONAL DATA INTERNATIONALLY\*\***

We share Candidate Data within the Remitly Group and to the external third parties (the categories of which are referred to in this notice). This may involve transferring your personal data outside the EEA or UK. Whenever we transfer your personal data out of the EEA or UK, we will ensure a similar degree of protection is afforded to it. In some instances, your personal data may be transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or Information Commissioner's Office. In other instances, we will ensure where we transfer personal data within the Remitly Group and to certain external third parties, we may use specific contracts approved by the European Commission or Information Commissioner's Office.

## **\*\*HOW DO WE PROTECT YOUR DATA?\*\***

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **\*\*WHAT ARE MY PRIVACY RIGHTS?\*\***

Candidates in certain regions of the world have specific data privacy rights based upon the applicable privacy legislation (including but not limited to the laws of Europe, UK, or US - California). We strive to implement the best privacy practices as a standard for all our Candidates.

### *Access Your Data & Data Portability*

You may request that we provide you a copy of your personal data held by us or transfer your data to a third party. This information will be provided without undue delay subject to certain exceptions or limitations, including if such provision adversely affects the rights and freedoms of others.

### *Correct Your Data / Data Rectification*

You have the right to request that we update and correct inaccuracies to your personal data.

### *Data Deletion/Erasure*

You may request to erase your personal data, subject to applicable law. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).

### *Object To The Processing of Data Requests*

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.

*Restrict Processing of Data Requests* This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it.

*Withdraw Your Consent* You have the right to withdraw your consent for us to process data, where our lawful basis for processing is based on that consent. Note that

withdrawal of consent does not affect the lawfulness of processing which may have taken place prior to withdrawal of consent.

*Exercising Your Privacy Rights* To exercise any of the above privacy rights, contact [DPO@remitly.com](mailto:DPO@remitly.com).

Please also note that sometimes we may not be able to stop using your personal data when you ask us to (for example, where we need to use it because the law requires us to do so or we need to retain the information for regulatory purposes). We will tell you if we are unable to comply with your request, or how your request may impact you, when you contact us.

## **\*\*HOW LONG DO WE RETAIN YOUR DATA?\*\***

Remitly retains Candidate Data as long as is required for the fulfillment of the above listed purposes. After this period of time, we will delete your data, in accordance with the laws in the country where you live except:

- when your application is successful and we need to enter into an employment relationship with you;
- when you consent to us continuing to process your data for communications regarding or consideration of future roles;
- in case of any misunderstanding between you and Remitly, for the purpose of pursuing claims and defending against claims.

You may also request deletion of your Candidate Data at any time. Unless otherwise required by law, or where Remitly may have a legitimate interest that justifies continued retention, Remitly will delete your Candidate Data after receiving such request, except for historical information regarding the positions for which you were considered, and the decisions made by Remitly with respect to your candidacy.

## **\*\*CHANGES TO THIS POLICY\*\***

We may change this Policy from time to time. Any changes to this Policy go into effect upon the effective date of the revised version.

## **\*\*CONTACT\*\***

If you have any questions, comments, or requests regarding this Policy, you may reach out to [DPO@remitly.com](mailto:DPO@remitly.com).

If you feel that we have not addressed your questions or concerns adequately, or you believe that your data protection or privacy rights have been infringed, you can complain to any supervisory authority or other public body with responsibility for enforcing privacy laws, as listed in the section entitled “Our Relationship with You” section.

## **\*\*OUR RELATIONSHIP WITH YOU\*\***

### **For Australian Candidates**

Remitly Entity

Remitly Australia, Pty Ltd

Registered Address

King & Wood Mallesons Level 61 Governor Phillip Tower 1 Farrer Place Sydney Nsw  
2000 Australia

Data Protection Authority

Office of the Australian Information Commissioner (OAIC)

### **For Brazilian Candidates**

Remitly Entity

Remitly Corretora de Cambio Ltda.

Registered Address

Av Paulista, 1374 12 Andar / Sala 12A124 Bela Vista, São Paulo-SP 01310-937 - BRAZIL

Data Protection Authority

Nacional Data Protection Authority (ANPD)

## **For Canadian Candidates**

Remitly Entity

Remitly Canada, Inc.

Registered Address

250 Howe Street, 20th Floor Vancouver, Bc V6c 3r8 Canada

Data Protection Authority

Office of the Privacy Commissioner (OPC)

## **For Ireland Candidates**

Remitly Entity

Remitly Europe Ltd

Registered Address

7th Floor Penrose Two, Penrose Dock Cork, Ireland T23 Yy09

Data Protection Authority

Data Protection Commission (DPC) [<https://www.dataprotection.ie/>](<https://www.dataprotection.ie/>)

## **For Nicaragua Candidates**

Remitly Entity



Remitly Nicaragua, S.A.

Registered Address

C/O Bolton Boyer (Attn: Michael Navas) Edificio Escala, Suite 2f Ave. Jean Paul Genie  
Managua, Nicaragua

Data Protection Authority

**For Philippine Candidates**

Remitly Entity

Remitly Philippines, RO

Registered Address

Romulo Mabanta Buenaventura Sayoc & De Los Angeles 21st Floor Philamlife Tower  
8767 Paseo De Roxas Makati City 1226 Philippines

Data Protection Authority

National Privacy Commission (NPC)

**For Poland Candidates**

Remitly Entity

Remitly Poland SP. Z O.O.

Registered Address

Bird & Bird Szepietowski I Wspólnicy Sp.K. Ks. I. Skorupki 5 00-546 Warsaw Poland

Data Protection Authority

Personal Data Protection Office (PUODO)

**For Singapore Candidates**

Remitly Entity

Remitly Singapore PTE. LTD.

Registered Address

Tmf Singapore H Pte Ltd. 38 Beach Road, South Beach Tower, #29-11 Singapore  
189767

Data Protection Authority

Personal Data Protection Commission (PDPC)

**For UK Candidates**

Remitly Entity

Remitly U.K. Ltd

Registered Address

90 Whitfield Street London W1t 4ez United Kingdom

Data Protection Authority

Information Commissioner's Office (ICO) [[www.ico.org.uk](http://www.ico.org.uk)]([www.ico.org.uk](http://www.ico.org.uk))

**For US Candidates**

Remitly Entity

Remitly, Inc.

Registered Address

1111 3rd Ave, Ste 2400 Seattle, WA USA 98101

Data Protection Authority

Federal Trade Commission (FTC) (Or State Specific Regulators)