

## **REMITLY POLAND sp. z o.o. Job Candidate Privacy Notice**

### **What is the purpose of this document?**

REMITLY POLAND sp. z o.o. ("**Remitly**", "**us**" or "**we**") is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being provided a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### **Data protection principles**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **The kind of information we hold about you**

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter/email.
- If you applied via an application form, the information you have provided in that form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview (or sent to us prior to an interview).
- If we ask you to perform any form of testing, the details and results of these tests.

We may also collect, store and use the following "special categories" of more sensitive personal information, if they are needed or you consented to:

- Information about your disability status.

## **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect the following categories of data: name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, compensation details, nationality and/or immigration status, registration details with regulators, professional memberships, referee details and information in your curriculum vitae.
- Your named referees, from whom we collect the following categories of data: details of your employment history or job performance.
- The following data from third party publicly accessible sources (related to professional life) such as LinkedIn that you have published work related to the Role: employment history, competency, skills and experience and referral and

related information.

## **How we will use information about you?**

Based on the provisions of labour law, necessity to take action at your request prior to the conclusion of the contract or our legitimate interest we will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role you are applying (the "**Role**")
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal and/or regulatory requirements, when applicable
- Pursue claims and defending against claims, in case of any misunderstanding between you and Remitly,

It is also in our legitimate interests to decide whether to appoint you to the Role since it would be beneficial to our business to appoint someone to that Role.

We also need to process your personal information to decide whether to enter into a contract of employment or services with you.

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

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

Having received your CV and covering letter, your application form together with any results from the test which you took (if applicable) we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the Role. If we decide to offer you the Role, we will then, based on your consent, take up references before confirming your appointment.

### **If you fail to provide personal information**

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 purpose of future recruitment processes.

### **How we use particularly sensitive personal information**

We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.

We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

### **Automated decision-making**

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

## **DATA SHARING**

### **Why might you share my personal information with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application: the employment agency that we have used as part of recruiting for this Role, our group companies, our software and platform providers that facilitate our administration of the recruitment process. 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 INFORMATION OUTSIDE THE EEA**

We share your personal information 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 information outside the European Economic Area (EEA). Whenever we transfer your personal information out of the EEA, we will ensure a similar degree of protection is afforded to it. In some instances, your personal information may be transferred to countries that have been deemed to provide an adequate level of protection for personal information by the [European Commission]([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)). In other instances, we will ensure at least one of the lawful safeguards are implemented, which may include:

- Where we transfer personal information within the Remitly Group and to certain external third parties, we may use specific contracts approved by the [European Commission](<https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countriesen>) which give personal information the same protection it has in Europe; or

- Where we use external third parties based in the US, we may transfer personal information to them if they are part of the [EU-US Privacy Shield](<https://www.privacyshield.gov/welcome%20and%20https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shielden>) which requires them to provide similar protection to personal information shared between Europe and the US.

## **DATA SECURITY**

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

## **DATA RETENTION**

### **How long will you use my information for?**

Your data will be processed as long as required for the fulfilment of the above mentioned purposes. We will store your data during the entire recruitment process

you are involved in. After this period of time, we will delete your data, except when your application is successful and we need to enter into an employment relationship with you.

To recruit personnel with specific skills and qualifications and maintain records of their application in order to assess such candidates for different and further vacancies, we may – subject to your consent - store your personal data for a period of one year from the end of the recruitment process you were involved in.

In case of any misunderstanding between you and Remitly, for the purpose of pursuing claims and defending against claims, we will store your data for a period of three years from the end of recruitment process or longer if it is required by law.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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 information for direct marketing purposes.

- **Request the restriction of processing** of your personal information.

This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [privacy@remitly.com](mailto:privacy@remitly.com) in writing.

Please also note that sometimes we may not be able to stop using your personal information 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 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.

## **PRESIDENT OF THE PERSONAL DATA PROTECTION OFFICE**

You have the right to make a complaint at any time to the President of the Personal Data Protection Office ( **PUODO**"), the Polish supervisory authority for data protection issues.