

# CANDIDATE PRIVACY POLICY

**Effective Date: December 3, 2020**

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## Policy Overview

The purpose of this Candidate Privacy Policy ("Privacy Policy") is to disclose what information we collect, how that information is provided to WorldAPP Inc. and/or its local affiliates, how that information is used, and how that information is protected. It also describes your choices regarding use, access, and correction of your personal information. By sending us your personal information as a job applicant FORM.com careers page, through third-party agencies and recruiters on your behalf, you agree to this Privacy Policy, and you consent to allow FORM.com to process your personal data according to this Privacy Policy.

FORM.com is the official trademark of WorldAPP, Inc.. This Privacy Policy applies to FORM.com, fr.form.com, and www.worldapp.com, which are owned and operated by WorldAPP, Inc.

## Personal Data We Collect

FORM.com will collect personal data from you and may collect data about you from other sources. If you provide any information regarding third parties who can provide references about you, you are solely responsible for obtaining their consent for FORM.com to process that data.

When you are applying for a job via our website we will collect the following information about you: first name, last name, e-mail address, phone number and any other information contained in your resume, CV, cover letter, certifications or other documents related to the job application or recruitment process that you provide to us.

We can also collect other information you may submit to us during the recruitment process: information you volunteer to disclose in a recruitment interview, information concerning your criminal records history, information regarding your previous compensation, and personal life. Your personal details may be collected directly from you in the form of official documentation you consent to provide us.

Further, information may be collected directly from you when you complete documents at the start of your employment with the company.

When you visit our websites, we may also use cookies to collect information about you. Please see Cookies and Tracking Technologies section of this document for more details.

FORM.com may collect the following information about you from other sources: information about your performance during previous employment from references, employees or other persons you worked with; publicly available information from websites or social media; background check information, including your criminal records history, educational, compensation and employment history, if and as allowed by the applicable legislation.

## How We Use Your Information

Your personal data will be used for recruitment purposes. This may include: creating a database of candidates for a particular position; evaluation of your skills and qualifications necessary for the open position and/or different positions within FORM.com; conducting background and reference checks; communicating with you during the recruitment process for the open position or in regards to the other opportunities within the company; confirming the information you provided in your application documents; detection and prevention of fraud or potentially illegal activities and responding to them; and fulfilling our legal obligations, including cooperation with governmental authorities and law enforcement bodies.

We may transfer personal information to companies that help us provide our services (agents, service providers, consultants). These companies are authorized to use your personal information only as necessary to provide these services to us, e.g., criminal checks, background checks, educational history checks, employment history checks, hosting of the recruitment system, analysis of the recruitment data and processes. Transfers to subsequent third parties are covered by the service agreements.

We reserve the right to disclose your personal information as required by law. This may include: when we believe that disclosure is necessary to protect our rights; to protect your safety or the safety of others; to detect, prevent or investigate fraud; for security or technical issues; and to investigate potential violations or to respond to requests by public authorities, including to meet national security or law enforcement requirements and/or to comply with a judicial proceeding, court order, or legal process served on our website.

## Data Retention

We determine the personal data retention period based on of the kinds of personal data processed and the potential risk of harm from unauthorized use of that personal data.

FORM.com will retain your personal information until the vacancy you are applying for has been filled, except when you consented to longer data retention. After that occurs, we may keep your personal data for a period of time that lets us maintain HR and business records, comply with applicable data retention legal regulations, exercise our rights regarding any potential legal claims, detect and prevent any fraudulent actions, and respond to information requests or complaints from you or other authorized persons. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We will delete your personal data when it is no longer needed for the purposes described above.

If you were not chosen to fill in the vacancy for which you applied but consented to data retention for other job vacancies which might suit you, we will process your data for up to three years after the recruitment process for the filled position ends.

If your job application is successful, your data will be transferred to the systems we operate for employees.

If there is any personal data that we cannot delete from our systems due to technical reasons, we will take the appropriate technical and organizational measures to make sure your data is protected from any unauthorized processing.

If you wish to request that we no longer use your information for recruitment purposes, contact us at [support@worldapp.com](mailto:support@worldapp.com).

We will retain information derived from cookies or other tracking technologies for a reasonable period of time starting from the date such information was created.

### **Important Note for European Candidates**

We process personal information for the following reasons: recruitment purposes; to manage job applications efficiently and fairly; to comply with our internal policies and legal requirements regarding records keeping; to comply with any contractual obligations connected with the recruitment process; to develop and improve our websites; to handle your requests; to comply with our legal obligations; to satisfy our legitimate interest in prevention of fraud, misuse of services, or money laundering; to ensure physical security, IT, and network security; and to comply with judicial proceedings, court orders and other official rulings.

The lawful basis for collecting and processing your personal information will depend on the type of personal information collected and purposes of its processing. Depending on the circumstances, The

lawful basis for collecting and processing your personal information will depend on the type of personal information collected and purposes of its processing. Depending on the circumstances, FORM.com may rely on the following lawful bases of your personal data processing:

1. you have given your consent to the processing;
2. processing is necessary for the performance of a contract with you or for your benefit;
3. processing is necessary to comply with FORM.com's legal obligations;
4. processing is necessary to protect your vital interests or vital interests of another natural person;
5. processing is necessary for ensuring FORM.com's legitimate interests, and there is no undue risk to your interests, fundamental rights, and freedoms;
6. processing is required or available under the applicable data protection legislation.

FORM.com may process the personal information you provided in the European Economic Area, the United States, or any other country outside the European Economic Area where FORM.com operates for use in any of the purposes described in this Privacy Policy.

When processing personal information transferred from the European Union, we rely on the EU-U.S. Privacy Shield Framework (for transfers to the United States), use standard contractual clauses approved by the European Commission, implement other means for ensuring adequate safeguards, or obtain your consent. You can receive more detailed information regarding the protection given to your personal data when it is transferred outside the European Economic Area (including a sample copy of suitable safeguards or information regarding where they have been made available) by contacting us.

By using our website and providing us with your personal data, you consent to the transfer of your personal data to the United States and other countries in which we operate outside of your jurisdiction.

In the event that you do not consent to FORM.com processing your personal information or do not provide us with information we are obligated to collect under local law, we might not be able to continue our recruitment procedure and/or employ you.

FORM.com's affiliate and representative in the EU is located at the following address:

**Designlogic Limited**

**The Square, Basing View, Basingstoke, Hampshire, RG21 4EB UK**

You can reach the Data Protection Officer at [dpo@form.com](mailto:dpo@form.com) or (781) 849-8118.

## EU-U.S. Privacy Shield

For the processing of personal information transferred from the European Union to the United States and United Kingdom, WorldAPP, Inc. participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. WorldAPP, Inc. is committed to subjecting all personal data received from European Union (EU) member countries and UK, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the [U.S. Department of Commerce's Privacy Shield List](#).

Under the Privacy Shield Framework, WorldAPP Inc. is responsible for the processing of personal data it receives and subsequently transfers to a third party acting as an agent on its behalf. WorldAPP Inc. complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and UK, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, WorldAPP Inc. is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, WorldAPP Inc. may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, you may invoke binding arbitration when other dispute resolution procedures have been exhausted. For a full description of this procedure, visit the [Privacy Shield website](#).

## Your Rights Regarding Your Personal Information

Upon request FORM.com will provide you with information about whether we hold any of your personal information.

You have the following rights regarding your personal information:

1. Right to access: you may address FORM.com with a request to access your information processed by FORM.com at any time;

2. Right to correct (rectify) your personal information: you may update your personal data within your account whenever needed on your own or e-mail our customer support for any assistance needed;
3. Right to withdraw consent at any time: you may withdraw your consent to your personal data processing at any time without being required to provide reasons for your decision. To withdraw your consent to the data processing, please contact FORM.com support team;
4. Right to request deletion (erasure) of your personal data: right to erasure or "right to be forgotten" may be fulfilled by asking for your personal data FORM.com holds to be deleted in certain circumstances. This includes, for example, situations when the data our company holds on you is no longer needed or when your data has been used unlawfully;
5. Right to data portability (transfer your data): this right allows you to receive your personal data from the company and store it for your personal use or reuse it for purposes across various services;
6. Right to restrict the processing of personal information concerning you or personal data being processed: upon providing a particular reason, you can limit FORM.com's use of your personal information. This is an alternative to request on erasure of your personal data;
7. Right to object: you have a right to object to the processing of your personal data by FORM.com at any time. This will allow you to stop or prevent FORM.com from processing your personal data. You may object to your personal data processing in relation to all of the personal data FORM.com holds about you or only to certain information. Objection to processing may also relate to a particular purpose FORM.com is processing the data for.

You can fulfill the above-mentioned and other rights you have regarding your personal information by making the change on our member information page or by e-mailing our Customer Support at [support@worldapp.com](mailto:support@worldapp.com), by contacting us by telephone (781) 849-8118 or postal mail at the contact information listed below. We will respond to your request within a reasonable timeframe.

You also have a right not to be subject to automated decision-making, including profiling, which produces legal effects or significantly affects you. FORM.com does not have automated decision-making, including profiling, within its recruitment processes.

Where we process your Personal Data on the basis of your consent, you have the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

You also have a right to lodge a complaint with your local data protection authority or regulatory body.

## Notice For California Residents

If you are a California resident, you have the following rights regarding your personal information under the California Consumer Privacy Act (“CCPA”), which went into effect on January 1, 2020.

### **Right to know what personal information we collect about you and the purposes of that collection**

You have the right to know what personal information about you we collect, the sources from which it is collected, and the purposes for which we collect it. Please refer to the Information We Collect section of our Privacy Policy for this information.

### **Right to know how your personal information is used**

You have the right to know how your personal data is used. Please visit the How We Use Your Information section of our Privacy Policy for this information.

### **Right to know with whom we share your personal information**

You have the right to know whether we share your personal data with any third parties. We may share your personal information with third parties who help us to run our business. Please refer to the How We Use Your Information section of our Privacy Policy for details.

### **Right to know whether any of your personal is sold**

We do not share, sell, rent out, or otherwise willfully disclose your personal information.

### **Right to access, request, and receive the personal information**

You have the right to request which personal data was collected about you and receive a copy of such information. We will disclose and deliver the required information to you in the manner described in the CCPA after receiving a verifiable request from you.

### **Right to “Opt Out of Sale” of your personal data**

We do not sell your personal data to third parties and do not offer an “opt out” mechanism.

### **Right to request deletion of your personal data**

You have the right to request deletion of your data from our systems to the extent provided by the CCPA. Please contact us at (781) 849-8118 or send an e-mail to support@worldapp.com to request deletion of your data.



## Non-discrimination

We will not discriminate against you for exercising any of your CCPA rights. For instance, we will not deny you goods or services; charge you different prices or rates for goods or services, including through granting discounts or other benefits, or impose penalties; provide you a different level or quality of goods or services; suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Please Contact Us if you have any further questions regarding your rights under the CCPA.

## How We Protect Your Information

Any information collected and processed by FORM.com is treated with the utmost confidentiality. FORM.com will not share, sell, rent out, or otherwise willfully disclose any personal information gathered from you, except as stated in this Privacy Policy. We will make no public release of any personal information that is provided by you within the recruitment process.

The security of your personal information is of great importance to FORM.com. We use various kinds of technical, physical, electronic, and administrative security mechanisms that are designed to protect your data from loss, damage, deletion, misuse, unauthorized access, disclosure, or alteration. We follow generally accepted industry standards to protect personal information submitted to us, both during transmission and once we receive it.

If you have any questions about security on our website, you can send e-mail us at [support@worldapp.com](mailto:support@worldapp.com).

## Cookies and Tracking Technologies

Technologies such as: cookies or similar technologies are used by FORM.com and our partners, affiliates, or analytics or service providers such as, Google, Hubspot, Outreach.io, Capterra, Bing, LinkedIn, Adroll, etc. These technologies are used in analyzing trends, administering the website, tracking users' movements around the website and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

Cookies are small files produced by the website you are visiting that store information on your computer or other device you are using as you navigate the web pages. We may use preferences,

advertising, processes, session state and analytics cookies. We use cookies to monitor the performance and uptime of our web properties. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

We process cookies to deliver our interest-based advertising notice and provide users the ability to accept or decline their usage. Third parties or we may place or recognize a unique cookie on your browser when you visit our websites to serve you targeted advertising (also referred to as "online behavioral advertising" or "interest-based advertising"). Our opt-out tool sends "Do Not Track" signals to companies to not use your browsing behavior to provide interest-based advertising by setting their opt-out cookie in your browser. When you accept or decline, ad network set usage session cookies to honor your preferences if you choose not to receive interest-based advertising. To opt-out of targeted advertising that is provided to third parties and us, clear your cookies on your browser. Clearing your browser's cookies removes all cookies, including the opt-out cookies set by the companies. You must re-establish your preferences by accepting or declining usage. Our cookie only knows your current status of preferences and does not reflect the current state of cookies on your browser from other websites.

## Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes, we will notify you by e-mail or by means of a notice on this website prior to the change becoming effective.

We encourage you to periodically review this page for the latest information on our privacy practices.