Job Applicant and Candidate Privacy Notice



INFORMATION SECURITY DEPARTMENT

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Owner: Sergey Samedov, ISO

1. General

- 1.1. This Job Applicant and Candidate Privacy Notice (the "Notice") aims to provide information on Processing Personal Information of job applicants and/or candidates (hereinafter referred to as "you" or "your") of WorldAPP, Inc., its affiliates, and subsidiaries (hereinafter referred together as the "FORM".) By submitting job applications to FORM through FORM own web-based systems or third-party's web-based systems, e. g., Lever, you agree to this Notice. If you do not agree with this Notice, you shall not submit job applications to FORM.
- 1.2. This Notice does not cover your use of FORM products or services. To learn more about FORM privacy practices regarding FORM products and services, please see FORM Privacy Policy as accessible via https://www.form.com/privacy-policy/. FORM website (-s) may also include links to other websites whose privacy practices may differ from those of FORM. If you submit Personal Information to any of those websites, such Personal Information is governed by their privacy policies. FORM encourages you to carefully read the privacy policy of any website you visit.
- 1.3. The purposes of this Notice include: (i) to disclose what Personal Information FORM collects; (ii) to explain how your Personal Information is used by FORM; (iii) to list lawful bases for Processing your Personal Information; (iv) to describe Retention of your Personal Information; (v) to list relevant Data Subject's rights; (vi) to provide information on sharing your Personal Information, and (vii) to disclose how your Personal Information is protected.
- 1.4. The words beginning with a capital letter and used in the present Notice are defined in (i) the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR"); (ii) the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (the "UK GDPR"); (iii) California Consumer Privacy Rights Act (the "CCPA"), Virginia Consumer Data Protection Act, Utah Consumer Privacy Act, Colorado Privacy Act, Connecticut Data Privacy Act or (iv) other applicable data protection laws. Personal Information and Personal Data have the same meaning for the purposes of this Notice.

2. Personal Information FORM Collects

2.1. Personal Information FORM collects includes, but is not limited to the following identifiers, education information, professional or employment-related information:

- Personal Details: full name, personal contact information (including email, phone, address), citizenship status, residency, educational background, job site information (e.g., LinkedIn), date of birth, photographs, any other information contained in a resume, CV, or other documents or letters submitted by you in writing or disclosed by you in oral form.
- · Business Information: full name, title, position, business contact information regarding previous or current employment, etc.
- Recruitment Information: job preferences, resume/CV, information on background check, work experience or other relevant experience, achievements, references files, information about performance during previous employment from references, job interview notes, candidate evaluation records, work permit status, including career trajectory and interests, and willingness to relocate, employment sponsorship information (e.g., if you need the sponsorship for employment visa status), etc. FORM may collect information related to any assessment that is mandatory to assess your suitability for the role, such as phone screens, interviews, and skills assessments (e.g., coding assessment for a software engineering role).
- · Remuneration Information: information regarding previous compensation, salary expectations information, bank details, etc.
- Technical Information: links, cookie information, traffic data or profiles, building and location access control monitoring systems data, etc. If you visit FORM onsite, FORM may collect information relating to on-premises monitoring for security purposes (e.g., video surveillance). If you access and use FORM devices, networks (e.g., corporate wifi), or other resources, FORM may collect information related to your access and use, such as domain names and IP addresses. FORM may collect your online usage information when you browse FORM websites (e.g., FORM Careers Page), including cookie information, traffic data, or profiles, which may be combined with any of the foregoing categories of your Personal Information.
- Sensitive Information: criminal background checks, information about your racial or ethnic origin, demographics (e.g., age, gender), veteran status, background check results, and health data (e.g., disability status), etc.
- · Any Other Personal Information, that is Submitted by You or Concerns You, and Received by FORM.
- **2.2. Personal Information of Third Parties.** Apart from Personal Information relating to yourself, you may also provide FORM with Personal Information of third parties, e.g., references contact information.
- 2.3. Children Personal Information. FORM does not target its website, in particular Career Pages, to children, and FORM will never knowingly collect Personal Information from children. If you have information that your children or any children under your care have provided FORM with information without your consent, please contact us at support@worldapp.com. If FORM becomes aware that an applicant is under the age of 16 and provided his/her Personal information to FORM, FORM will remove their Personal Information from FORM files. By submitting a job application to FORM, you represent and warrant that you are not under 16 years of age.
- **2.4. Aggregate/De-Identified Information.** FORM may aggregate and/or de-identify any Personal Information collected so that such information can no longer be linked to a single person. FORM may use such aggregate/de-identified information for any purpose, including without limitation for research purposes, and may also share such information with any third parties at FORM discretion.
- 2.5. You are responsible for ensuring that Personal Information you submit to FORM is correct and true. You are under no statutory or contractual obligation to provide Personal Information to FORM during the recruitment process. However, if you do not provide Personal Information, FORM may not be able to process your job application properly or at all.

3. How FORM Collects Personal Information

3.1. Directly from Data Subjects.

- **3.1.1.** FORM collects your Personal Information from a variety of sources, but in most circumstances directly from you as a Data Subject. You may usually provide this Personal Information about yourself directly to FORM with the use of FORM Careers pages accessible through FORM own web-based systems or third-party's web-based systems, e.g., Lever. You may also provide this Personal Information through emails, electronic messages, phone calls, other channels in writing or oral form. When you participate in job interviews, you may also provide Personal Information during such interviews. When you have received and accepted FORM job or business offer, you may be required to disclose additional Personal Information necessary for concluding a contract or provide any Personal Information voluntarily.
- **3.1.2.** Where FORM asks you to provide Personal Information to FORM on a mandatory basis, FORM will inform you of this at the time of collection. The failure to provide mandatory Personal Information may result in FORM's inability to carry out certain processes for recruitment purposes and thus, might not be able to consider you as an applicant. For example, if you do not provide FORM with a resume/ CV, FORM will not be able to consider you as a job applicant. You may also choose to voluntarily provide FORM with any Personal Information, including sensitive Personal Information.
- **3.1.3.** FORM generally collects sensitive Personal Information directly from you. However, FORM may also collect sensitive Personal Information from background check providers, if legally required or permitted.
- **3.1.4.** Apart from Personal Information relating to yourself, you may also provide FORM with Personal Information of third parties, e.g., references contact information. Before you provide such third-party Personal Information to FORM, you must first inform these third parties of any such information that you intend to provide and of the Processing to be carried out by FORM.
- 3.1.5. FORM may collect Personal Information you have made public, such as the public profile on career networking sites (e.g., LinkedIn).

- **3.2. From Third Parties.** FORM may also obtain some Personal Information from third parties, e.g., references from a previous employer or academic supervisor, background check performed by third parties (where authorized by applicable law), or, occasionally, from workforce members of FORM. Where relevant for the position, FORM may receive information from professional licensing and certification bodies, employment research firms, identity verification services, and educational and training institutions.
- **3.3. From Technical Means.** In some circumstances, Personal Information may be collected from monitoring devices or by other technical means (for example, building and location access control and monitoring systems data), if and to the extent authorized by applicable laws. Where FORM collects Personal Information from monitoring devices, FORM shall notify you prior to such monitoring in accordance with FORM's internal policies or applicable data protection laws.

When you visit FORM website, FORM may also use cookies and log files to collect information about you. To learn more on how to control the use of FORM cookies on personal devices, please visit FORM Cookie Policy Page as accessible via https://www.form.com/cookie-policy/.

4. Lawful Basis for Personal Information Processing

- **4.1.** The lawful basis for collecting and Processing your Personal Information will depend on the type of Personal Information collected, and the purposes of its Processing. Depending on the circumstances, FORM may rely on either of the following lawful bases of Personal Information Processing.
- **4.2. Consent.** In limited cases, where consent is required for Processing in question, it will be sought from you separately to ensure that it is freely given, informed, and explicit. Information regarding such Processing will be provided to you at the time that consent is requested, along with the impact of not providing any such consent. For example, you may agree that FORM can contact you about future job opportunities for up to two (2) years or other applicable term.
- **4.3. Contract.** Processing may be necessary for providing contracts of employment or engagement and preparing to commence employment or engagement where you accept an offer from FORM.
- **4.4. Legal Obligation.** Processing may be necessary to comply with a legal obligation to which FORM is subject, for example, avoiding unlawful discrimination, meeting statutory record-keeping requirements, or health and safety obligations. In such cases, the applicable law shall constitute the lawful basis for Personal Information Processing.
- **4.5. Vital Interests.** Processing may be necessary to protect the vital interests of you as a Data Subject or another natural person (e.g. emergency, accident etc.).
- **4.6. Legitimate Interest.** Processing may be necessary for ensuring FORM's or third-party's legitimate interests, and there is no undue risk to your interests, fundamental rights, and freedoms, which require protection of Personal Information. In order to rely on the legitimate purpose for Processing of Personal Information, FORM takes specific mitigating measures to ensure a proper balance between the legitimate interest and your fundamental rights and freedoms.
- **4.7. Applicable Laws.** Processing may be required or permitted under the applicable legislation.

5. How We Use Your Personal Information

5.1. Purposes of Personal Information Processing. Subject to applicable laws, your Personal Information may be stored and Processed by FORM for the recruitment or HR management purposes that include, without limitation, the following.

5.1.1. Recruitment and Selection.

- To evaluate job applications.
- · To perform pre-employment screening including, where appropriate, identity check, reference check, criminal record check.
- To make decisions concerning the selection.
- · To contact you regarding the recruitment process, including scheduling interviews and communicating with you.
- · To make job or business offers.
- · To provide contracts of employment or engagement and prepare to commence employment or engagement where you accept offers from FORM.
- · To contact you about future job opportunities.
- · To deal with any query, challenge, or request for feedback received in relation to FORM recruitment decisions.
- · To monitor programs to ensure equality of opportunity and diversity.

5.1.2. Ongoing Management of All Aspects of Your Relationships with FORM

To perform global recruitment and HR management purposes.

- To manage and maintain HR electronic or hard copy records, files, and systems, including technical support and maintenance of HR systems and managing electronic and hard copy records in line with FORM's retention schedules.
- To set and change building and system access permissions.
- · To identify and communicate effectively with you.
- · To provide effective internal or external business communication.
- · To reimburse you for any expenses and travel agreed by FORM.
- To manage and operate performance reviews, capability, attendance, and talent programs.
- · To manage grievances, allegations (e.g., whistleblowing, harassment), complaints, investigations, and disciplinary processes, and make related management decisions.
- To train, develop, promote, to perform career and succession planning, where applicable.
- To perform business contingency planning and response to active incidents.

5.1.3. Health and Safety

- To process health information to assess eligibility for incapacity or permanent disability-related remuneration or benefits:
 - o determine fitness for work;
 - o make adjustments or accommodations to duties or the workplace;
 - o make management decisions regarding employment or engagement;
 - o conduct related management processes.

5.1.4. Compliance and Security

- To audit, monitor, investigate, and perform compliance monitoring activities under FORM's policies and procedures, applicable laws, to prevent and detect criminal activity, breaches of applicable laws and regulations.
- To protect FORM assets and premises, as well as all Personal Information processed by FORM.
- · To ensure physical security, IT, and network security.
- To measure the performance of FORM's systems by monitoring your usage of such systems.
- To comply with FORM internal policies and legal requirements regarding records keeping.
- To comply with any legal obligations of FORM.

5.1.5. Responding to Legal and Regulatory Requests

- FORM may provide access to your Personal Information to third parties in order to: (a) comply with a legal process or a regulatory investigation (e.g., a subpoena or court order); (b) enforce this Notice, or other contracts, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect the rights, property or personal safety of FORM, its workforce members, its business partners, its users and/or the public. FORM likewise may provide Personal Information to other companies and organizations (including law enforcement) for fraud protection, spam/malware prevention, and similar purposes. Required Personal Information shall be disclosed by FORM to the competent public authority strictly to the extent required for performing a legal obligation of FORM.
- To handle your requests.
- **5.2. FORM Internal Group Access.** WorldAPP, Inc. and any of its affiliates and subsidiaries as controllers or joint controllers may transfer your Personal Information to each other for purposes of global recruitment and HR management. The subsequent access to your Personal Information by FORM legal entities is limited to the minimum necessary for the intended purposes.
- **5.3. Service Providers.** WorldAPP, Inc. and any of its affiliates as controllers or joint controllers of your Personal Information may transfer such Personal Information for Processing to the vendors of FORM. Such vendors may include recruitment and HR services providers, legal consultants, communication services providers, work tools providers, IT services providers, etc., whose services may be used by you or FORM in the context of considering you as a job applicant or candidate. We only share the information we collect with the third parties for the purposes of providing that service. These companies are authorized to use your personal information only as necessary to provide these services to us. These services may include sending communications, background check services, conducting HR research and analytics, providing HR cloud infrastructure, information security services. We may use service providers which may deliver artificial intelligence and generative artificial intelligence capabilities, machine learning, or other technology to process personal data and create Al-generated responses or other content according to the purposes outlined in this Privacy Policy.
- **5.4. Third Parties.** FORM may transfer your Personal Information to a party with whom FORM is in negotiation for the sale or transfer of a business, assets, or services, or other third parties in all cases on the lawful bases and strict compliance with the applicable laws.
- **5.5.** FORM shall use and store Personal Information in accordance with applicable data retention requirements as defined below.

5.6. For the CCPA purposes, we inform you that he categories of the personal data that we disclosed for the business purposes over the preceding 12-months period include identifiers, education information, professional or employment-related information.

6. Personal Information Retention

6.1. Any of your Personal Information collected by FORM will be retained by FORM only as long as Personal Information is required to serve its purpose or as directed by applicable legislation, regulation, contractual, or statutory obligation.

6.2. Retention Periods.

- **6.2.1.** FORM will Process your Personal Information for the duration as necessary for achievement of purposes determined in this Notice, or as required under applicable legislation, regulation, contractual, or statutory obligation.
- **6.2.2.** If you are offered and accept a role of FORM workforce member, FORM will retain your Personal Information in order to manage your employment or assignment with FORM, and FORM will surface a separate privacy notice that will apply to your relationship with FORM.
- **6.2.3.** If your job application is not successful (or you withdraw or decline FORM offer), FORM will retain your Personal Information for the purposes provided in this Notice, such as to keep you in mind for current or future roles, to help FORM evaluate and improve the recruitment processes, and for record-keeping.
- **6.2.4.** Where you provide consent, FORM will process your Personal Information to contact you about future job opportunities for up to two (2) years.
- **6.2.5.** In specific circumstances, FORM may store your Personal Information for longer periods, e.g., in order to have an accurate record of your dealings with FORM in the event of any complaints or challenges, or if FORM reasonably believes there is a prospect of litigation relating to your Personal Information.

6.3. Personal Information Databases and Services.

- **6.3.1.** FORM may use separate databases to store different types of your Personal Information or use third-party services that are needed for recruitment and HR management purposes. These services may include but are not limited to collecting the job applications.
- **6.3.2.** The databases or services can be accessed by authorized persons of FORM. There are security measures for all the databases and services in place, including the use of passwords, and other access controls which will ensure the confidentiality of the Personal Information contained in such databases and within the information systems of the third-party service providers.
- **6.4.** Personal Information that is no longer needed for its stated purpose, or compliance with applicable legislation, regulation, contractual, or statutory obligation, will be destroyed, erased, or made anonymous in accordance with FORM's internal procedures. Personal Information stored within the third-party databases should be deleted in accordance with their data retention policies under FORM's direction and supervision.

7. Data Subject Rights

7.1. Applicable data protection laws give you as a Data Subject the specific rights in relation to Personal Information. Some of these rights are summarized below.

Right to Be Informed. FORM provides you with information as required by applicable laws under this Notice. Upon your request, if applicable, FORM will provide you with information about whether FORM holds any of your Personal Information, as well as with other information as required by law.

Right to Withdraw Consent. Where Processing is based on consent, you may withdraw your consent to Personal Information Processing at any time without being required to provide reasons for your decision. You have the right to withdraw that consent at any time, without affecting the lawfulness of Processing based on consent before its withdrawal.

Right of Access, request, and receive the personal information. You may address FORM with a request to access your Personal Information processed by FORM at any time. We will disclose and deliver the required information to you in the manner described in the applicable law after receiving a verifiable request from you. It is important to note that this is not an absolute right to review all Personal Information that is held about you. In particular, you may not be able to access Personal Information about yourself if this would reveal Personal Information about someone else. Some Personal Information may also not be readily accessible. FORM will use its best efforts to fulfill your access request, where technically feasible.

Under the CCPA, in respect of the preceding 12-month period, you may receive information about the categories of data that was collected, sources from which the personal data was obtained, purposes for collecting the personal data, categories of the third parties with whom the information was shared, the specific pieces of information that was collected or other information as outlined by the law.

Under the CCPA, in respect of the preceding 12-month period, you have a right to access the categories of data collected, categories of personal data "sold", categories of the third parties to whom the personal data was "sold", categories of personal information that was "sold" to each of the third parties, categories of personal information that we have disclosed for business purposes.

If you are a California resident and provide us with a verifiable request to access your personal information, we will provide you with this information free of charge, in a readily usable format and within 45 days of the receipt of the request. If your request is complicated or there are other reasonable grounds, we may extend this term to 90 days, upon notice to you.

Right to Data Portability. This right allows you to receive your Personal Information from FORM and store it for your personal use or reuse it for purposes across various services.

Right to Rectification. You may update your Personal Information whenever needed. To update Personal Information, please contact FORM via email at support@worldapp.com for any assistance needed. This right complies with your obligation to keep your Personal Information provided to FORM accurate and up to date.

Right to Erasure (deletion). Right to erasure or "right to be forgotten" may be fulfilled by asking for Personal Information FORM holds to be deleted in certain circumstances. This includes, for example, situations, when Personal Information FORM holds on you is no longer needed or when Personal Information has been used unlawfully.

If you are a California resident, your verifiable consumer request to delete your personal data, subject to the exceptions provided by the law, will be processed by our company without charge and within 45 days of the receipt of the request. If reasonably necessary, we can extend this period by an additional 45 days upon notice to you. We may retain personal information as authorized under applicable law, such as personal information required or necessary to complete contractual obligations, to provide our services, to detect security incidents, protect against malicious or illegal activities, to identify and fix bugs, to exercise the right to a free speech or other rights, to comply with law enforcement requests pursuant to lawful process, for scientific, statistical or historical research, for our internal purposes that are in line with your reasonable expectations form us, or to comply with legal obligations.

Right to Restriction of Processing. Upon providing a particular reason, you can limit FORM's use of your Personal Information. For example, where your Personal Information shall be rectified, processing of such information may be temporarily restricted. This is an alternative to requesting the erasure of your Personal Information.

Right to Object. You have a right to object to the Processing of your Personal Information by FORM at any time. This will allow you to stop or prevent FORM from Processing your Personal Information. You may object to your Personal Information Processing in relation to all of Personal Information FORM holds about you or only to certain Personal Information. Objection to Processing may also relate to a particular purpose FORM is Processing Personal Information for. This right also includes a right to object to FORM processing of your personal information for direct marketing purposes. At the same time, employment law may impose legal obligations that necessitate Processing of Personal information by FORM. Due to this, your right to object may not be absolute.

Right Not to Be Subject to Automated Decision-Making, including Profiling. You have a right not to be subject to a decision-making process that is fully automated and does not include any human input on the outcome. FORM does not have automated decision-making on your Personal Information Processing at the moment.

Right to Lodge a Complaint with a Competent Supervisory Authority. You may also address the competent supervisory authority with a complaint where applicable.

Right to opt-out: you have a right to opt-out of some disclosures of your data to the third parties; opt-out of sharing of your data for the advertising purposes on the third-party websites.

Right to know whether any of your personal information is "sold" or "shared", right to opt out of such "sales" or "sharing": we may "sell" or "share" personal information, as defined in certain laws, including but not limited to the CCPA, (in the form of identifiers, IP addresses and internet activity information) with the advertising companies for purposes of targeting advertisements on the advertising party's or third-party websites, applications and services. When you visit our website, we may share the following categories of information for such interest-based advertising, which may be considered a "sale" or "sharing" as defined by the CCPA: (1) device information and identifiers (IP address and unique advertising identifiers and cookies); and (2) connection and usage information (browsing history or app or website usage).

In the preceding 12 months we have collected and "shared" or "sold" identifiers mentioned above.

Other than collection of personal data via the cookies as stated above, we do not consider that our processing of personal data constitutes a "sale" of personal information under the CCPA.

Our HR data processing is not directed to individuals under 16 - so we do not knowingly "sell" or "share" the personal information of consumers under 16 years of age.

Do Not Sell My Personal Information. You may opt-out of such advertising cookies via our cookie banner or cookie preferences button/sign on the website, by going the Network Advertising Initiative and Digital Advertising Alliance websites as further detailed in our Cookie Policy or by contracting our support team via support@worldapp.com or at (781) 849-8118.

Right to limit (opt out of) the use and disclosure of sensitive personal information: You have a right to request that FORM restrict the use of your sensitive personal information; direct FORM to limit its use of sensitive personal information to specific business purposes; and instruct FORM to limit disclosure of sensitive personal information, unless an applicable exemption applies to the listed rights in the applicable data protection law. Please be informed that FORM does not sell or share your sensitive personal information as defined in the CCPA. If you have any additional questions about your sensitive data collection and processing, please feel free to contact us at: (781) 849-8118 or send an e-mail to support@worldapp.com

Right to Non-Discrimination. We will not discriminate against you for exercising any of your data privacy rights. For instance, we will not deny you an opportunity to apply for a job at our company if you exercise your privacy rights.

Other Rights. You may have other rights as defined under the GDPR, UK GDPR, CCPA, Virginia Consumer Data Protection Act, Utah Consumer Privacy Act, Colorado Privacy Act, Connecticut Data Privacy Act or other applicable data protection laws.

7.2. How to Fulfill Data Subject Rights. You can fulfill the above-mentioned and other rights you have regarding your Personal Information by contacting FORM via the contact details listed herein. FORM will respond to your requests within a reasonable timeframe as applicable.

Laws may also give you the right to designate an agent to exercise these rights on your behalf.

Please note that California residents may only make a verifiable consumer request twice within a 12-month period.

8. Personal Data Transfer

8.1. International Transfers. Your Personal Information may be transferred within or outside of the jurisdiction where you reside, either within FORM group of companies or to third parties. Personal Information may be transferred to and Processed by FORM in the USA, UK, Poland, Ukraine, and other jurisdictions where FORM or its data importers have operations.

8.1.1. EU-U.S. Data Privacy Framework.

WorldAPP, Inc. complies with EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the U. S. Department of Commerce. WorldAPP, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

WorldAPP Inc. is responsible for the processing of personal data it receives, under the Data Privacy Framework, and subsequently transfers to a third party acting as an agent on its behalf. WorldAPP Inc. complies with the Data Privacy Framework 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 Data Privacy 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.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, WorldAPP, Inc. commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF in the context of the employment relationship.

Under certain conditions, more fully described on the Data Privacy Framework website https://www.dataprivacyframework.gov/s/, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

8.1.2. Other Transfer Mechanisms. FORM relies on the applicable adequacy decisions about certain countries of destination, uses Standard Contractual Clauses approved by the relevant supervisory authorities, or implements other means for ensuring adequate safeguards for international transfers of your Personal Information. FORM will ensure that any Personal Information transfer is proportionate and limited to that Personal Information which is strictly necessary for the circumstances. This may include, but not be limited to, that FORM will take appropriate steps to ensure that the data importer of Personal Information in such circumstances puts in place an adequate level of protection for such Personal Information in accordance with applicable legal requirements. Where necessary, FORM shall implement supplementary measures to secure the transfer of Personal Information.

9. Protection of Personal Information

- 9.1. Any Personal Information collected and Processed by FORM is treated with the utmost confidentiality.
- **9.2.** The security of your Personal Information is of great importance to FORM. FORM will not share, sell, rent out or otherwise willfully disclose any of your Personal Information. FORM uses various kinds of technical, physical, electronic, and administrative security mechanisms that are designed to protect your Personal Information from loss, damage, deletion, misuse, unauthorized access, disclosure, or alteration.
- **9.3.** FORM follows generally accepted industry standards to protect your Personal Information submitted to FORM, both during transmission and once FORM receives it.
- 9.4. You can receive more detailed information regarding the security of your Personal Information, including, but not limited to, when it is transferred outside the EEA, Switzerland, or UK (including a sample copy of suitable safeguards or information regarding where they have been made available) by emailing FORM at support@worldapp.com.

10. Changes to This Notice

- **10.1.** FORM may update this Notice to reflect changes to FORM information practices. If FORM makes any material changes, FORM will notify you by e-mail or by means of a notice on this website prior to the change becoming effective.
- **10.2.** FORM encourages you to periodically review this page for the latest information on FORM privacy practices.

11. Contact Details

- 11.1. Data Controllers' Contact Details. WorldAPP, Inc. and its affiliates or subsidiaries may be considered controllers or joint data controllers of your Personal Information depending on the location of the job posting to which you are applying. You may contact data controllers of your Personal Information under the contact details provided below.
- **11.2. Global Privacy Contact Details.** You can contact FORM by e-mailing FORM at support@worldapp.com, or FORM Data Protection Officer at dpo@form.com, or (781) 849-8118.
- 11.3. **EEA Privacy Contact Details.** FORM representative in the EEA is DPO Consulting, in Paris, France. If you reside in the EEA countries, you may reach the EEA representative at DPO Consulting by sending an e-mail to the following address: dpo_eu@form.com.
- **11.4. UK Privacy Contact Details.** FORM establishment in the UK is Designlogic Limited. You may reach FORM UK establishment by mail:

Designlogic Limited

Station House Station Approach, East Horsley, Leatherhead, England, KT24 6QX.

11.5. If you have any questions or comments about this Notice, you can contact FORM at support@worldapp.com. You can also send your request by mail:

WorldAPP, Inc.

859 Willard Street, Suite 400, Quincy MA 02169