**Upwind Security, Inc.**

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**JOB CANDIDATE PRIVACY NOTICE**

This Job Candidate Privacy Notice (the "**Notice**") describes the ways that Upwind Security, Inc. (together with its affiliated companies – "**Company**", "**we**", "**us**" or "**our**") recruiting you as a candidate, collects and uses your personal data as a candidate ("**you**" or "**candidate**"). We work with data processors to whom we have instructed to collect, store and process personal information on our behalf for the purposes of providing our services, for example, Comeet, as a recruiting and applicant tracking platform ("**Platform**") in order to handle your personal data as a candidate. It also describes the rights and options available to you with respect to your personal data.

We may have an additional privacy notice(s) explaining our own specific privacy practices related to your personal data ("**Company Notice**").

We are the responsible party for the candidates' personal data when provided to the Platform in the context of your candidacy. We determine the means and purposes for the processing of your personal data.

Please note that this Notice is provided only for transparency purposes. If you have any questions related to your personal data, you should contact the Company directly.

1. **Personal Data Processed**. We receive personal data about you as a candidate for positions at the Company, such as: contact information, address, Curriculum Vitae (resumé) information (including information such as skills, work experience, education), notes submitted with the application, URL of your LinkedIn and other online profiles, the position for which you have been or are being considered, the source who submitted your candidacy (e.g., recruiting agency, referral), email correspondences between you, the Company and between the Company and other sources (such as recruiting agency and referrals) about your candidacy, information from references, events in the lifecycle of your candidacy, your responses to questionnaires sent to you by us, information about your candidacy and employment options (such as availability to be hired and salary expectations), evaluations of your candidacy, internal discussions within the Company about your candidacy, materials you or other parties (such as evaluators or background check providers) submitted in relation to your candidacy. If you submit your candidacy by email, or online, then you are the main source of the personal data. Your personal data can also originate from other sources, such as LinkedIn profile, recruitment agencies, headhunters and referrals.

2. **How Your Personal Data Is Used Legal Basis**. We will use your personal data in accordance with our Company Notice (if any available to you), including to evaluate and consider you as a candidate for positions, in accordance with its processes and policies for evaluating employment candidates, to contact you for your candidacy status and interviews, to schedule meetings and interviews, amongst others.

   The lawful bases we rely on for processing personal information are (if applicable to us under privacy law):

2.1. You gave us your consent to the processing of your personal data (for one or more specific purposes);

2.2. Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;

2.3. Processing is necessary for the purposes of the legitimate interest; and/or

2.4. Processing is necessary for compliance with a legal obligation to which the controller is subject.

If you have questions about these uses, please contact us. Please note that the legal basis is provided for GDPR purposes only.

3. **Who Will Process Your Data**.

3.1. We may share your personal data with our service providers and vendors who assist us to collect, process and store your personal data, including Comeet (who provide us with the Platform) in the context of your candidacy. These companies are authorized to use your personal data as necessary to provide these services or as otherwise authorized by us. Comeet's privacy policy is available here.

3.2. Personal data may be shared with, or transferred to, our affiliated corporate group entities (entities controlled by, under common control with, or controlling us, directly or indirectly).

3.3. We may share your general recruitment status with third parties who submitted your candidacy to us.

3.4. If your details are submitted to the Company by a third-party (such as an employee of the Company or a recruiting agency), the Company can give the third-party access to your name, photo and some of the general recruitment status.

3.5. If you apply to a job opening using a unique referral link that was provided to you by an employee of the Company to which you are applying, the Company may share some of your general recruitment status, without identifying you by name, with the person that provided you the referral link.

3.6. The purpose of sharing the above information is to operate incentive programs (i.e. employee referral bonus programs) of the Company and to provide feedback to third-parties who submit candidates to the Company regarding their submission.

3.7. If we are required to disclose your information by a judicial, governmental and/or regulatory authority to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order.

3.8. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events.

3.9. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your

personal data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.

If you wish to receive further information, please contact us.

4. **Security and Data Retention**.

4.1. Retention. We will retain your personal data for as long as we need it to assess you as a candidate or as long as we have a valid legal basis. In accordance with our internal data retention policies and practices, we can decide whether to keep your personal data, delete it or pseudonymize/anonymize it.

4.2. Security. We implement industry standard measures to reduce the risks of damage, loss, unauthorized access, or use, of your personal data. However, these measures do not provide absolute information security.

5. **International Data Transfers**.

5.1. We host your personal data in connection with our use of the Platform either in the European Economic Area, in the US, in the country where we are located, or in countries deemed as providing an adequate level of data protection.

5.2. Your data will be accessible in the country where we or our service providers are located, the UK, the US, and countries deemed as providing an adequate level of data protection.

5.3. See here the Platform's vendors. For more information, please contact us.

6. **Your Rights**. Your rights may vary, depending on the applicable law. These rights may not be available in certain jurisdictions and/or may be subject to certain derogations or limitations. You may have the following rights:

6.1. To ask us to receive a copy of your personal data that is stored on our servers, including the Platform;

6.2. to update, correct and/or delete your personal data;

6.3. to request the restriction of processing concerning your personal data or to object the processing of your personal data;

6.4. to request to obtain a copy of your personal data in a structured, commonly used and machine-readable format;

6.5. If we rely on consent, please note that you have the right to withdraw consent at any time; and/or

6.6. to lodge a complaint with a supervisory authority.

If you wish to exercise any of these rights, please contact us. If you choose to exercise any of your rights, we will handle these requests in accordance with applicable law but please note that exercise of some of those rights may have some consequences in your application as a candidate.

In the context of the Platform we do not use any automated decision-making related to your personal

data.

7. **Minors**. We do not intend to collect personal data of children. If you have reason to suspect that children data is collected, you are kindly requested to immediately report it to us. If you have questions regarding children's personal data contact us.

8. **Changes to This Privacy Notice**. From time to time, we may change or update this Notice. If we do so, we will make efforts to notify you of such changes by any means.

9. **Contact Us**. If you have any comments or questions regarding this Notice, or if you have any concerns regarding your personal data held with us, please contact us at privacy@upwind.io. If you are a GDPR or UK GDPR-protected individual, you also have the right to lodge a complaint with an EU supervisory authority, or the UK's Information Commissioner's Office, as appropriate.

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