

# Tide Recruitment Privacy Notice

## 1. Scope and Overview

In the Tide Recruitment Privacy Notice (“this Notice”), “Tide”, “we”, “us”, and “our” means Tide Platform Limited, or the relevant member of the Tide Corporate Group proposing to employ you. For the purposes of data protection laws, we are a “data controller” (or “data fiduciary”) with respect to your personal data. This means that we are responsible for deciding how we hold and use personal data about you prior to, during, and after your recruitment process with Tide.

This Notice tells you what you can expect Tide to do with your personal data when applying for a job role at Tide and covers:

- What information we process about you and why we do that
- How long we store it for
- Who would have access to your data information
- Whether we intend to transfer it to another country
- And what your rights are

This Notice applies to all candidates for a job at Tide worldwide (collectively called “Candidates”). Please note that since we employ talent in various jurisdictions, some sections of this Notice may not apply to you due to the laws and regulations applicable in your country or region. Hence, you may be prompted with further, more specific privacy notices, from time to time, which supplement and should be read in conjunction with this Notice. If you have questions or would like to receive more information about the processing of your personal data and your rights, please contact Tide’s Privacy and Data Protection Office using the contact details in section 14 below.

## 2. Collection of personal data

For the purposes of this Notice, personal data means any information that relates directly or indirectly to you. Personal data excludes anonymous or de-identified data that is not associated with you, for example, high-level details about the gender diversity of candidates who apply at Tide. Considering this, we have described below the types of personal data we will collect and process about you as part of your recruitment process with Tide.

### 2.1 Data we collect directly from you

We will collect directly from you and will further process the following main categories of personal data:

- Your personal and contact details, such as your names, title, permanent address or current residence, telephone number, personal email address, date of birth, gender, citizenship, photograph and any other details voluntarily provided to us as part of your candidature.
- Audio, transcript, video and/or photo data that we record during your interviews with Tide.
- Details about how you’ve found out about the job role you’re applying for, whether you have worked for Tide before and if you have family or other type of relationships with any current Tide employees, contractors, directors or representatives.
- Information about your right to work in the country where the job role is based out of, incl. details about your willingness to relocate and relocation support needs.

- Your skills and education details, such as information about your professional education, certificates, industry association memberships, language skills, skill levels, and any other similar details voluntarily provided to us as part of your candidature.
- Details about your application at Tide and information collected as part of the recruitment process, such as interview notes and evaluations, dates of interviews, feedback provided during and after the interview process, written or oral assessments of your skills, email correspondence, etc.
- Details you provide to us before starting your employment with Tide such as details about your previous employment (work history, company name, job role, description of duties, etc).

## **2.2 Data we collect from third parties or generate about you**

In addition to the data we collect directly from you, we will also generate and/or receive data about you through third parties, such as criminal record bureaus, courts, credit rating agencies or your former employer. This includes but is not limited to:

- CCTV footage if you visit any of our offices during the application process and other information obtained through electronic means such as swipe card records.
- Publicly-available information about you such as details on your LinkedIn profile, publications by your previous employers, posts by conferences you've attended and industry associations you are a member of, etc.

## **2.3 Sensitive data**

Certain forms of special categories of personal data are subject to more stringent protection and restrictions by law in certain countries or regions, including the European Union (EU) and the United Kingdom (UK). Tide will collect, store and use the following special categories of personal data about you:

- Information about your health, including your medical condition, disabilities, special health needs, and any reasonable adjustments you may require during the interview process and your potential employment with Tide.
- Information about your sexual orientation, gender, pronouns, ethnic background (depending on jurisdiction) that you may decide to provide voluntarily as part of our diversity and inclusion program. If you decide to share this with Tide, we will provide you with full details of the information that we would need, the reason why we need it and how it will be used by Tide so that you can carefully consider whether you wish to consent and share that information with Tide. You should be aware that sharing your information in such cases will be based on your explicit consent and your decision will not impact the outcome of your application with us.

## **3. How we will use information about you**

### **3.1 Lawful bases and purposes for processing your data**

We will only use your personal data when the law allows us to. We will only collect, use, share or otherwise process your personal data where we are satisfied that one or more of the following lawful bases apply:

- when this is necessary to meet our legal obligations as an employer. For example, we will use your personal data to assess your right to work and to discharge our immigration law obligations; during the interview process.

- when we need to do it in order to take steps in preparation for entering into a contract with you, in particular to consider you for a position at Tide.
- to pursue our legitimate interests (or the legitimate interests of others such as the Tide Corporate Group), such as to understand if you'll be a good cultural fit at Tide, for the purpose of legal proceedings or to optimise the hiring process by analysing video and audio data from your interviews with Tide.
- to protect your vital interests, in connection with an emergency or as otherwise required to protect your or someone else's life, health, or safety. For example to inform you of an emergency situation developing in the office building.

We have listed below some non-exhaustive examples of the purposes for which we will process your personal data on the lawful grounds listed above:

- to ensure a consistent approach to the interviewing process of our job applicants.
- to maintain contact with you in the future and notify you of job vacancies within the Tide group that you might be interested in
- to assess your qualifications and suitability for a particular job role at Tide
- for equal opportunities monitoring
- to manage our financial position including accounting, and auditing
- to comply with our health and safety obligations

In each case, we will process your sensitive personal data if permitted by law and only if one of the following conditions is met:

- you have given explicit consent in writing to the processing of the data
- the processing is necessary to protect your health or safety in an emergency (or that of another person) where you are physically or legally incapable of giving consent
- the data in question has been made public by you
- the processing is necessary for the purpose of, or in connection with, any actual or prospective legal proceedings, or for obtaining legal advice
- the processing is necessary to comply with generally accepted principles of good practice within our type of industry relating to the prevention or detection of crime, unlawful acts, or other seriously improper conduct
- the processing is otherwise permitted by law.

### **3.2 If you fail to provide personal data**

If you fail to provide certain information when requested, we may not be able to comply with our legal obligations (such as to ensure the health and safety of our workers) or continue our recruitment process with you.

Nevertheless, you should note that every time we ask for your consent to process your personal data, agreeing to this request will not be a condition for continuing your recruitment with us and your refusal to provide this consent won't affect your application.

### **3.3 Do we need your consent?**

We can process your personal data without your consent only when we are required or allowed to do so by applicable law or regulation.

### **4. Sharing your information with third parties**

Tide will share your personal data with the following third parties:

#### **4.1 Members of the Tide Corporate Group (Subsidiaries and affiliates)**

To the extent required or permitted by law, we will disclose your personal data to members of the Tide Corporate Group for the purposes of:

- The management and operation of our business, for example, to allow global teams to collaborate efficiently
- Taking regional or global decisions about our human resources
- Assessing compliance with applicable laws, regulations, and internal policies of Tide
- Communicating with you for the during the application process
- Administration of our information technology systems.

We will take steps to ensure that your personal data is accessed only by Tideans and third parties (i.e. service providers) engaged by Tide p who have a need to process your personal data for the same purposes described in this Notice.

#### **4.2 Other third parties**

We will also share your personal data with third parties outside of the Tide Corporate Group for the following purposes:

- To third party agents, contractors and service providers for the purposes of providing services to us, including but not limited to IT and communications providers, law firms, recruitment partners, etc.. These third parties will be subject to confidentiality obligations and they will only use your personal data as described in this Notice.
- To courts, law-enforcement agencies, industry regulators such as the FCA, BaFin, RBI, data protection supervisory or other public authorities to the extent required by law, for example, if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

We require all our third-party service providers, agents and contractors to adopt appropriate security measures to protect your personal data consistent with our internal policies and security obligations. We do not permit our third-party service providers to process your personal data for their own purposes. We only permit them to process your personal data for the purposes in our agreement with them and in accordance with our instructions.

### **5. Cross-border data transfers**

For the purposes identified above, we will transfer your personal data to members of the Tide Corporate Group or other third parties who will be based in other jurisdictions that are not deemed to provide the same level of data protection as the country where you are currently established.

If you are located in the EU or the United Kingdom (UK), please note that your personal data will be transferred outside the European Economic Area (EEA) or the UK and it will be protected in a manner consistent with how your personal data is protected by us in the EEA or the UK. This is achieved by Tide via different instruments, for example:

- The country to which we send the data is approved by the European Commission or the United Kingdom to provide for an adequate level of data protection or
- The recipient of your data has signed a contract based on “model contractual clauses” approved by the European Commission or the United Kingdom, obliging them to protect your personal data as if it were still in the EEA/UK.

If you are located in India, Tide shall ensure your data is processed only in countries or territories as permitted by the The Central Government of India.

In all cases, we will ensure that any transfer of your personal data is compliant with the applicable data protection laws. You can obtain more details about the protection given to your personal data when it is transferred outside of the jurisdiction where you are currently established by contacting Tide’s Privacy and Data Protection Office using the contact details set out in section 14 below.

## **6. Data security**

Tide has implemented an ISMS (Information Security Management System) in accordance with the ISO 27001 standard, which has been independently audited by an accredited third party. This means we have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration or disclosure during and after your engagement with Tide.

For example, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access (“need-to-know”). We also implement access controls to all data processing facilities used for the processing of your personal data, preventing unauthorised persons from gaining access to those facilities or to technical infrastructure where your personal data is stored. We also implement suitable measures to ensure that personal data are protected from accidental destruction or loss, for example - our overarching Information Security Policy supplemented by specific security policies, standards, and procedures applicable to all members of the Tide Corporate Group worldwide, backup and recovery policies, disaster recovery and business continuity systems and policies and protocols, etc.

## **7. Data retention**

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for or as required to satisfy any legal, reporting, or other legal and regulatory obligations of Tide or to achieve Tide’s legitimate interests. For example, your recruitment information will be retained for the duration of the recruitment process with Tide and for a certain period of time after its termination as dictated by the employment or other laws applicable to Tide and as specified in Tide’s Data Retention Policy (including the relevant Data Retention Schedules).

How long we hold your personal data for exactly will vary depending on the type of your personal data, the ongoing validity of the purposes for which we are holding your personal data, any legal obligations imposing on us a minimum or maximum period for retention of your personal data, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use, disclosure or deletion of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means.

Under some circumstances, we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

## **8. Your rights**

It is important that the personal data we hold about you is accurate and current. We will take all reasonable steps to ensure the personal data we hold about you is not incorrect or misleading as to any matter of fact but please keep us informed if your personal data changes during your engagement or if you notice any inaccuracy in your data as stored by Tide.

Depending on the jurisdiction governing the processing of your personal data, you will have a number of legal rights in relation to the personal data that we hold about you. These may include the right to:

- Obtain information on how we process your personal data.
- Access the personal data that we hold about you or a summary of your personal data
- Correct personal data that we hold about you
- Erase the personal data that we hold about you
- Object to the processing of your personal data under certain circumstances
- Restrict the processing of your personal data
- Transfer your personal data to a third party
- Nominate a person to exercise your rights in the event of your death or incapacity.
- Lodge a complaint with Tide's DPO by using the contact details in Section 14 below and/or to lodge a complaint with your local data protection regulator (for example the Information Commissioner's Office in the United Kingdom, the Bulgarian Commission for Personal Data Protection or the Indian Data Protection Board) if you think that any of your rights have been infringed by us.

You can contact Tide's Privacy and Data Protection Office using the contact details in section 14 below to exercise these rights.

Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **8.1 No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we will charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances.

## **9. Right to withdraw consent**

Where you have provided your consent to the collection, processing, or transfer of your personal data, for example - when you've participated in applicant surveys, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, please contact Tide's Privacy and Data Protection Office using the contact details set out in section 14 below.

## **10. Automated decision making and profiling**

To make quicker and more consistent decisions, we also conduct automated individual decision-making in some instances. This means that in the cases listed below we will analyse some information about you via technological means to assess your personal circumstances and to make decisions. For example, we perform automated decision making to determine, based on your CV and responses, whether you meet the requirements of the particular job role you've applied to, for example if you meet our core skill set criteria, our location requirements for employment, national labour visa requirements, or our notice period criteria.

When we make automated decisions in those circumstances, you can request a review of such a decision by Tide, express your point of view or contest the decision by contacting us at [dpo@tide.co](mailto:dpo@tide.co).

## **11. Cookies and other tracking technologies**

Tide may use first- and third-party cookies and other tracking technologies, including web beacons, to manage our website (identified by the URL "www.tide.co"), to identify you and your interests and remember your preferences, and to collect analytics about how you use our website.

Some of our online recruiting activities are hosted by third parties. When you access sites operated by these third parties, they may, to the extent permitted by applicable law, place their own cookies or other tracking technologies on your device.

## **12. Data Protection Officer**

If you have any questions about this Notice or how we handle your personal data, please contact us at [dpo@tide.co](mailto:dpo@tide.co).

## **13. Changes to this Notice**

We reserve the right to update this Notice at any time, and we will make sure that the most recent version of this Notice is available on Tide's website or may be requested by contacting Tide's Privacy and Data Protection Office using the contact details set out in section 14 below. We will also notify you in other ways from time to time about the processing of your personal data.

## **14. Contact us**

If you have any questions about our processing of your personal data or would like to make an access or other request, please email Tide's Data Protection Officer at [dpo@tide.co](mailto:dpo@tide.co).