

# citizenM job application privacy policy

last updated 08/07/2024

## 1. introduction

This citizenM (“we”, “our” or “us”) Applicant Privacy Policy (“Policy”) supplements any privacy policy that was presented to you upon your application through our website or via our third-party partners and applies to the processing by citizenM of your personal information in connection with your job application. citizenM takes the privacy of its job applicants very seriously and treats their personal information with great care. citizenM acts in accordance with applicable data protection legislation. Your personal information is processed by or on behalf of:

- citizenM Operations Holding B.V., a limited liability company registered under the laws of the Netherlands, having its statutory seat in Amsterdam, the Netherlands and its offices at Leidseweg 219 (2253 AE) Voorschoten, the Netherlands. citizenM Operations Holding B.V. is registered with the Dutch Chamber of Commerce under registration number 34218994; and
- citizenM Asset Management U.S.A., LLC, a limited liability company under the laws of Delaware, having its statutory seat in Dover, Delaware, U.S.A.

In the context of the processing of job applications, citizenM Operations Holding B.V. and citizenM Asset Management U.S.A., LLC will act as joint data controllers. citizenM Operations Holding B.V. will be the point of contact for all your questions regarding the processing of your personal information.

For information about how we handle your personal information as a visitor to our website, including collection of cookies and your rights with respect to them, please see our global Privacy Policy located [here](#).

## 2. information we collect and process

citizenM collects the personal information of job applicants for recruitment purposes only and will not process this personal information in a manner that is incompatible with those purposes. Recruitment includes normal business and analytical practices related to the recruitment process. If you submit a job application (general or for a specific role) via our website or our other communication channels, we process your personal information in order to evaluate your application. If you are offered and accept employment with us, some of the personal information we have collected during the recruitment process will form part of your employment contract. As part of our recruitment process, we may, subject to applicable laws, in some countries collect or engage third parties to collect additional information, such as to conduct a background check, reference check or psychological assessment. Where you do not provide this personal information, we may be unable to process your job application.

Personal information will be processed only if such processing is based on consent, legitimate interest or compliance with a legal obligation, as provided for in section 6(1) of the **General Data Protection Regulation (“GDPR”)**. Where consent to the collection of personal information is revoked, we will stop processing the personal information.

See Annex I for a detailed overview of the categories of personal information collected, the special personal information collected, the legal grounds for collection and the source of personal information collected.

### 3. sharing your information

We will never sell your personal information to third parties or share it for purposes of cross-context behavioral advertising (with the exception of your website browsing data which is addressed in our global Privacy Policy [here](#)). We may disclose your personal information in a limited number of circumstances, including:

- **Third-Party Service Providers:** We share personal information with third parties involved in the process of providing recruitment services to us or performing recruitment functions on our behalf. Those third parties are only permitted to use your personal information for the purpose for which it has been provided and may not disclose it to any other third party except at our express direction and in accordance with this Privacy Policy.
- **Legal & Regulatory Authorities:** We may from time to time make your personal information available to legal and regulatory authorities, to our accountants, auditors, lawyers or similar professional advisers or to other third parties, when this is required by law, necessary to permit us to exercise our legal rights, to comply with our legal obligations, or necessary to take action regarding illegal activities or to protect the safety of any person.
- **Business Transitions:** If all or part of our company is sold, merged or otherwise transferred, we may transfer your personal information as part of that transaction.
- Any other third parties with your consent.

### 4. your choices and rights

The following choices and rights with regards to your personal information are available to you:

#### **Access Request Rights**

You have the right to request that we provide to you the following information about our collection and use of your personal information:

- The (categories of) personal information we have collected about you.
- The categories of sources for the personal information we have collected about you.
- Our business purpose for collecting that personal information.
- The categories of third parties with whom we share or have shared that personal information.
- The specific pieces of personal information we collected about you .
- Information regarding any disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

## **Deletion, Rectification and Restriction Request Rights**

You have the right to request that we delete, restrict or, if you believe that our processing of your personal information is incorrect or inaccurate, change any of the personal information collected from you and retained, subject to certain exceptions. Once your verifiable consumer request is confirmed, we will delete, restrict or change, as the case may be, and direct our service providers to delete, restrict or change your personal information. Your request to delete the personal information collected may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the GDPR or California Consumer Privacy Act, or other applicable law.

## **Data Portability Rights**

In some cases, you may receive a copy of your personal information in a structured, commonly used and machine-readable format.

## **Right to Object**

Where we process your personal information based on a “legitimate interest”, you may have the legal right to object to the processing of your personal information, on grounds relating to your particular situation.

## **Right to Revoke Consent**

Where we process personal information based on your consent, you have the right to revoke such consent at any given time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

## **Post-mortem Right to Privacy**

You have the right to set instructions regarding the storage, deletion or communication of your personal information after your death.

## **Right to Complain**

You have the legal right to lodge a complaint with the competent authority.

When handling any data access, erasure, or correction requests, we will first confirm the identity of the individual making the request or query and consider our obligations under applicable data protection laws and regulations. Such requests are usually provided free of charge, however, a reasonable fee may be applied to cover our administrative costs for requests that are manifestly unfounded, excessive or repetitive. We always aim to provide you with a response within 15 days. We will not discriminate against you for exercising any of these rights.

You have the right to have an authorized agent submit a request on your behalf. We may require that agents provide verification that they are acting on your behalf.

## **5. protecting your personal information**

citizenM has used and will continue to use reasonable endeavors to protect personal information against loss, alteration or any form of unlawful use. Where possible, personal information will be encrypted and stored on a virtual private server that is secured by means of industry standard protection measures. A strictly limited number of people, i.e. those people

that must have access to personal information for the purpose of their job, have access to personal information. If and to the extent personal information will be stored in a cloud infrastructure provided by third party cloud providers, these providers will be bound by written contract to process personal information provided to them only for the purpose of providing the specific service to citizenM and to maintain appropriate security measures to protect this personal information. citizenM strives to make limited use of paper files which contain personal information. If the use of paper files cannot be avoided such paper files are stored in a closed cabinet and are destroyed in accordance with the applicable retention terms.

**Data Breaches:** citizenM will protect the personal information it processes against loss and unlawful processing. If despite such protection a data breach occurs, citizenM will report such data breach to the appropriate regulatory authorities where it leads to a considerable likelihood of serious adverse effects on the protection of personal information, if it has serious adverse effects on the protection of personal information, or if otherwise advisable or required by law. The data breach will also be reported to the affected individuals if it is likely to adversely affect their privacy or if otherwise required by law. In order to ensure that a data breach will receive adequate attention and, if required, be reported, we have implemented a Data Breach Policy, which describes the procedure that must be followed in case of a data breach.

**Data Processing Register:** citizenM will record the details of each data process in a data processing register. New data processes will undergo a data protection impact assessment (“DPIA”) prior to their implementation if such data process is likely to result in a high risk of harm to the rights and freedoms of our job applicants. This DPIA process helps us determine if appropriate measures are being taken to safeguard the personal information of our job applicants.

**Data Retention:** The personal information of job applicants will become part of their employment record and will be used for employment purposes if the job application is successful. To the extent any psychological assessment reports are part of a recruitment file, these will be stored in a separate file accessible on a strict need-to-know basis only. Personal information of job applicants that are not successful will be deleted after expiration of the applicable statutory retention periods unless they provide express written consent to register their name and contact details, resume, job role or location preferences for a longer period for the sole purpose of contacting them in case of new job opportunities that may interest them. During this period job applicants can always have their details removed from our files by sending an e-mail to [mpower@citizenm.com](mailto:mpower@citizenm.com).

**Cross-Border Data Transfers:** As we operate internationally, sharing your personal information across borders may be essential to operate our business. You therefore acknowledge and agree that citizenM may transfer your data globally. Your personal information may be transferred to a citizenM hotel or our (support) partners in a country outside of the country where it was originally collected or outside of your country of residence or nationality. For technical and organizational reasons and in the context of our digital cloud infrastructure, personal information is also transferred to servers located in the U.S.A. or to servers located in other countries outside of the European Economic Area. In this regard, we have followed due diligence and entered into contractual agreements as required by applicable data protection laws, including where appropriate EU or UK model clauses, with the receiving parties. Our contracts impose obligations on the receiving parties to ensure appropriate technical and organizational measures are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information, consistent with our obligations under applicable data protection laws. Please contact us if you wish to receive more information on

the specific safeguards we have implemented to ensure an adequate level of data protection regarding such transfers.

## 6. monitoring & audit

Compliance with this citizenM Privacy Policy will be monitored regularly. The data processing register will be updated promptly upon the implementation of a new data process. The completeness and accurateness of the data processing register will be verified regularly.

## 7. revisions to this applicant privacy policy

We have done our best to make sure that this Privacy Policy explains the way in which we process your personal information and rights you have in relation thereto. However, we may change this Privacy Policy from time to time to make sure it is still up to date. When necessary, we will alert you to these changes by posting a prominent notice on our website.

## 8. contact information / how to update your personal information

If you have any questions or comments about our Privacy Policy or would like to exercise any of your rights as outlined in this Policy, please email us at [privacy@citizenm.com](mailto:privacy@citizenm.com) or mail to citizenM Operations Holding B.V., attn. Legal Department, Leidseweg 219, 2253 AE Voorschoten, the Netherlands. You may also click [here](#) to use our online form. Our Data Protection Officer can be contacted at [dpo@citizenm.com](mailto:dpo@citizenm.com).

If, as an EEA resident, you believe that we have not adequately resolved any such issues, you have the right to contact your EU supervisory authority.

In the Netherlands:

Autoriteit Persoonsgegevens

P.O. Box 93374

2509 AJ the Hague, the Netherlands

## Annex I: Overview of personal information collected

purpose of collection	categories of personal information collected	specific personal information	legal grounds for collection	source of personal information
Recruitment	Identifiers	Name, gender, mailing address, email address, telephone number, date and place of birth, visa information, place of residence, your profession, ID number	Legitimate Interest Compliance with legal obligation (visa information, ID number)	Job application materials, other communications with us
	Protected Classification Characteristics (i.e., Diversity and inclusion information)	Age, gender, gender identity, ethnicity, sexual orientation, religion, marital status, disability, preferred pronouns, military or veteran status, citizenship status	Consent	Job application materials, other communications with us

	Sensitive Personal Information	<p>Visa information, ID number, racial or ethnic origin, citizenship or immigration status, health or disability status, union membership</p> <p>citizenM does not use sensitive personal information for the purpose of inferring characteristics about a job applicant</p>	Consent Compliance with legal obligation	Job application materials, other communications with us
	Internet or Other Similar Network Activity	IP address, online behavior on our website	Consent Legitimate Interest	Website, cookies, tracking technologies
	Professional or Employment-Related Information	Resume, work history, diplomas received, references, job role or location preferences	Legitimate Interest Consent	Job application, employment assessments and screenings, other communications with us
	Inferences drawn from other personal information	Your characteristics, predispositions, behaviors, personality traits	Legitimate Interest	Job application, employment assessments and screenings, other communications with us
				Job application, employment assessments and screenings, other communications with us
Sensory Data	Photographs	Employment applications	Consent	Job application, other communication with us

In order to analyze the effectiveness of our recruitment processes, i.e. to learn more about the behavior of the visitors of the careers page on our website and to improve our recruitment process, we may process the information listed above on an aggregated level on the basis of our legitimate interest. In an effort to promote equal opportunities and reinforce equal opportunity hiring practices at citizenM we include optional demographic questions in our job applications. Your responses, or your choice not to respond, is entirely anonymous and will not be associated with your application.