

# Data Privacy Notice For Candidates

Version 4.0, February 2024

## 1. Introduction

Trustpilot is committed to safeguarding the privacy and security of your personal data.

The purpose of this Data Privacy Notice (the "Notice") is to describe how we collect and use personal data about candidates that are being considered for work with Trustpilot.

When we talk about "**Trustpilot**", "we", "us" or "our", we mean Trustpilot A/S Pilestraede 58, 5th floor, DK-1112 Copenhagen K and our affiliated group of owned and controlled subsidiary companies, including the Trustpilot company that you have applied for work with as an employee, worker or contractor.

We use the term "**personal data**" to describe information about you as an individual that can identify you, such as your name, information about your skills and education, your CV and cover letter. Personal data does not include data where the identity has been removed (we call this "anonymous" or "anonymized data").

## 2. Who does this Notice apply to?

This Notice applies to job applicants and potential candidates for employment and other engagement with Trustpilot.

It's important that you read this Notice so that you understand how and why we are using your personal data.

## 3. Data Controller

The Trustpilot company with which you are being considered for work is the primary "data controller" for the personal data that we have about you. As the data controller, we are responsible for deciding what personal data to collect about you and how it's used.

You can find contact details for all of the companies within the Trustpilot group [on our website](#).

## 4. Trustpilot's Data Protection Officer

We've appointed a Data Protection Officer ("DPO") to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal data, please contact our DPO at [privacy@trustpilot.com](mailto:privacy@trustpilot.com).

## 5. What information do we collect about you?

In connection with your application for work with us, we may collect, store, and use the following categories of personal data about you:

- **Information provided in your CV and cover letter**, such as your name, address, date of birth, details of your qualifications, skills, employment history, or information about your current level or expected level of remuneration.

- **Details provided via our application form**, such as your name, telephone number, email address, picture and your LinkedIn profile.
- **Information about your right to work**, such as your nationality, work visa, or a copy of your passport.
- **Any information you provide to us during an interview.**
- **Test results** of any tests taken during the recruitment process, such as professional skills evaluations or exercises.
- **Information obtained from background and reference checks.**

For certain roles, we may need to carry out additional background and reference checks. These may require us or third-party service providers to process details of your former employer, education, credit history and/or criminal record data. We'll always make you aware of this before we carry out the checks and only process this data where needed and permitted by law.

Where relevant and legally permitted, we may also collect, store and use the following **special categories** of personal data:

- **Information about your health**, if this is in accordance with local laws and is appropriate to and required for the work that you are interested in.

With your consent, we may use your special categories of personal data in the following ways:

- If you provide us with your disability status, we may use information to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during the interviews or upon you joining Trustpilot as an employee, worker or a contractor.
- We may also use information about your race, national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Trustpilot does not request or consider information about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership and membership of a professional or trade association in connection with recruiting. To the extent that you make such special categories of personal data available to Trustpilot, you consent to Trustpilot processing such information in accordance with this Notice.

## 6. How is your personal data collected?

Where permitted by law, we may collect personal data about you from the following sources:

- you, the candidate
- recruitment agencies
- credit reference agencies
- agencies responsible for handling criminal records in your jurisdiction

- your named referees
- other publicly available sources, where this is permitted in your jurisdiction

We collect personal data about candidates through the application and recruitment process, either directly from you or sometimes from a third party.

As a part of the recruitment process, we may also ask you to take various tests, including professional skills tests, and the results of such tests will be provided to Trustpilot.

If you fail to provide all of the information that is necessary for us to consider your potential employment or engagement with us (such as evidence of qualifications or work history), we will not be able to process your application successfully.

## **7. How will your personal data be used?**

Having received your personal data in connection with your application, we may then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If we call you for an interview, we will use the information you provide to us, including the information you provide during the interview, whether to offer you the role or not. If we decide to offer you the role, we may offer you the role subject to carrying out the necessary background and criminal checks.

We use your personal data for the following purposes:

- **To communicate with you during the recruitment process**

- **To identify and evaluate you for potential employment or engagement**

We hold and use your personal data because we need it to assess your skills, qualifications and suitability for employment or engagement. We also need to make sure that you have the right to work in the country in which you are being considered for work. Finally, we may use it to carry out background and reference checks, where applicable.

- **To meet our legal responsibilities**

We are required by law to collect and hold some personal data – for example in relation to your right to work. We are also obliged to share your personal data to comply with demands or requests made by relevant regulators, government bodies and courts. It is also necessary to collect and use personal data relevant to any claims or legal disputes relating to your application with Trustpilot, or otherwise.

- **For record keeping**

In most jurisdictions, it is a legal requirement to retain records relating to candidates for a designated period to ensure compliance with the law.

- **To improve our hiring process**

We may also analyze your personal data or aggregated/anonymized data to improve our recruitment and hiring process and strengthen our ability to attract successful candidates.

If you have sent us an application but subsequently wish to withdraw it, please contact us at [HR@trustpilot.com](mailto:HR@trustpilot.com).

## 8. What is our legal basis for processing your personal data?

In general, we collect and use your personal data for the following purposes:

- To **pursue legitimate human resources and business management interests** of our own during the recruitment process and for keeping records of the process, *or*
- To enable us to **comply with legal obligations**.

In Australia, we will process your personal data where you have provided us with your express or implied consent to do so.

Some of the personal data we might collect is known as “**sensitive personal data**” or “**special categories of data**”. The rules about how we process those types of data are stricter. We will only collect and use this information with your explicit consent (for example if you voluntarily provide us with the information) or if we are permitted to do so by law (for example under the exemptions set out in data protection laws).

## 9. Who do we share your personal data with?

Trustpilot operates internationally, so your personal data will be accessed by recruiters and interviewers working in the country where you are considered for work, as well as by recruiters and interviewers working in [Trustpilot companies in different countries](#).

Individuals performing administrative functions and IT personnel within Trustpilot will also have limited access to your personal data in order to perform their jobs.

Your personal data may also be made available to other third parties, such as law enforcement, public bodies such as courts, and in the context of, for example, a possible sale or restructuring of our business.

We outsource the processing of certain functions to selected third parties and in order for these third parties to provide services to us, we need to disclose your personal data to them. Such third parties include, for example, professional skills test providers and information technology service providers performing services at the request of Trustpilot.

All of our third-party service providers and other entities in the Trustpilot group are required to take appropriate security measures to protect your personal data and to keep it confidential. We don't allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and only in accordance with our instructions.

## 10. Is your information sent abroad?

Some of these data processors and third-party services will be located in countries outside of the one in which you are based and may have different, or less stringent, data protection standards. However, subject to the local laws in these countries, we will ensure that necessary safeguards are in place to protect your data, regardless of location. We do this through a combination of appropriate technical, organizational and administrative security measures, and by putting in place the necessary legal contracts to back up these requirements. For example, we will only transfer European users' personal data outside the European Economic Area where a European Commission approved method of validating the transfer has been put in place.

For more information about how Trustpilot safeguards transfers of your personal data, please contact our DPO at [privacy@trustpilot.com](mailto:privacy@trustpilot.com).

## 11. How long will we keep your information?

If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process. In some circumstances, we may anonymize your personal data so that it can no longer be associated with or tracked back to you, in which case we may continue to use such information without providing further notice to you.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## 12. What are your rights?

Under certain circumstances, and where applicable by law in your home country, you have the right to:

- **Request access** to your personal data (known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.
- **Request correction** of the personal data that we hold about you if it is incomplete or inaccurate.
- **Request us to restrict the processing** of your personal data. This allows you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (Trustpilot's or those of a third party) and there is something about your particular situation which gives you reason to object to processing on these grounds.
- **Request the transfer** of your personal data to another party.

- **Withdraw any consent given** to the processing of your personal data. In the limited circumstances where you have provided your consent for the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.
- **File a complaint** to us or with your local data protection agency.

If you want to exercise any of these rights, please email our DPO at [privacy@trustpilot.com](mailto:privacy@trustpilot.com) who will do their best to respond to your request promptly.

Please note that if you withdraw your consent, object to how we process your personal data, or ask us to restrict the processing, this will not affect the lawfulness of the processing we have already carried out.

### **13. How do we protect your personal data?**

We are committed to keeping your personal data secure. We will ensure an appropriate level of security to protect your personal data, including protection against unauthorized disclosure or unlawful processing and against accidental or intentional loss, destruction or damage.

We employ up-to-date technologies and systems to protect your personal data from unauthorized disclosure or damage or misuse. We also restrict access to confidential information to only those members of our staff and third parties who have a reasonable need to access it.

To learn more about our current security practices and policies please see **our security practices**. We're always working to improve our security practices and we will update this information as these practices evolve over time.

### **14. Do we use cookies?**

We use cookies and similar technologies to help deliver, optimize, personalize and analyze our services, and for advertising purposes. We use a combination of cookies and other technologies, such as pixels and tracking codes, to collect information for use in line with the purposes set out in this Notice.

Please see our [Cookie Policy](#) for more information and details of the types of cookies and similar technologies we use.

### **15. US residents' privacy rights**

This section provides additional details about the personal information we collect about residents of various US states and the rights afforded to them under the following U.S. State privacy laws:

- the California Consumer Privacy Act of 2018, ("CCPA");
- the California Privacy Rights Act of 2020, ("CPRA");
- the Colorado Privacy Act of 2021, together with all implementing regulations, ("CPA");
- Connecticut Act Concerning Personal Data Privacy and Online Monitoring of 2022, ("CTDPA");
- Virginia's Consumer Data Privacy Act of 2021, ("VCDPA"); and
- Utah Consumer Privacy Act of 2022, ("UCPA").

For the purposes of this Notice, the “U.S. Privacy Laws” means the U.S. State data protection and privacy laws that are applicable to our processing of your consumer data, such as CCPA, CPRA, CPA, CTDPA, UCPA, VCDPA and any other state or local laws in force and effect that apply to U.S. Residents' Data as may be amended, repealed, and replaced from time to time.

This section applies to the residents of the United States and outlines the rights and protections for individuals residing in different states across the U.S.

For more details about the personal information we've collected over the past 12 months, please see 'What information do we collect about you?' above. We collect this information for the business and commercial purposes described in 'How will your personal data be used?' above. We share this information with the categories of third parties described in 'Who do we share your personal data with?' above.

You have the following rights in relation to the personal information we hold about you:

- right to be informed
- right to request deletion
- right to opt out
- right to disclosure
- right to data portability
- right to equal services and prices (non-discrimination)

We are committed to exercising your privacy rights, including the rights granted to you under the U.S. State Privacy Laws.

In accordance with the U.S. State Privacy Laws requirements, we will not discriminate against you for exercising any of your rights. You may make a request pursuant to your rights under the U.S. State Privacy Laws by contacting us via email ([privacy@trustpilot.com](mailto:privacy@trustpilot.com)) or by mail using the contact details set out below. We will verify your request using the information associated with your account, including the email address. In some U.S. jurisdictions consumers can also designate an authorized agent to exercise these rights on their behalf.

In some U.S. jurisdictions, you may request to opt out of the sale of your personal information to third parties. The relevant U.S. State Privacy Laws define a sale very broadly and this includes communicating personal information to another business or a third party for non-financial gain. Subject to the laws in your applicable jurisdiction, you can opt out from any practice that may lead to the sale of your personal data at any time. To manage your privacy preferences and opt out of the sale of your personal information, please use the features provided to opt out in our dedicated [Do Not Sell My Info site](#). You can also contact us via email ([privacy@trustpilot.com](mailto:privacy@trustpilot.com)) or by mail using the contact details set out below.

## **16. Changes to this Notice**

We may change this Notice from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our services or business. We will post the changes to this page and encourage you to review this Notice to stay informed.

## **17. Contact us**

We aim to make this information as clear and transparent as possible. But if you still have questions about how we process your personal data, or would like to exercise your rights under this Notice, you're welcome to contact our Data Protection Officer at [privacy@trustpilot.com](mailto:privacy@trustpilot.com).

You can reach us by mail using the contact details provided [here](#).

You can also find additional resources about data privacy in our [Support Center](#).