

**IT Central Station Ltd.
EU Candidate Privacy Notice**

For Candidates for Employment or Contractual Services in the European Union

Updated December 24, 2020

1. Introduction

1.1 This IT Central Station Ltd. EU Candidate Privacy Notice (“Notice”) outlines how IT Central Station Ltd. (“IT Central Station”, “we”, “us”, and “our”) collects, uses, and transfers (collectively “processes”) the personal data of candidates for employment or for contractual services in the European Union (“you” and “your”).

1.2 The data controller is IT Central Station Ltd. We determine how and why your personal data is processed. Our address is 55 Nahal Sorek, Modi’in, Israel.

2. Processing your Personal Data

2.1 *The Purpose.* IT Central Station will process your personal data for job recruiting and placement purposes, including for notification of future job opportunities, and, for successful candidates, for employment purposes. Sometimes these activities are carried out by third parties. We will inform you separately in case your personal data will be made subject to so-called automated decision-making. Processing of your personal data is required to enable IT Central Station to administer the recruiting process, including the set-up of an electronic job applicant HR file, managing your application, organizing interviews – in short, the processing is necessary for us to enter into a contract with you. In case of legal proceedings, we will need to process your personal data to establish, exercise, or defend us against the legal claim. We may also share your personal data with subsidiaries of IT Central Station to consider you for future job openings in our subsidiaries, and we will retain your data for a limited period of time beyond an unsuccessful application for this purpose. You may object to such use of your data.

2.2 *Categories of Personal Data.* If provided to us, we process the following categories of personal data about you:

- identification data, including first name and surname;
- contact information, including home address, phone/mobile/fax number, e-mail address;
- gender, date of birth, citizenship;
- data regarding responses to screening questions (where applicable);
- background check information (where applicable);
- previous employment information, including date of hire, job title, department and business unit, work location, work status (full time, part time), data pertaining to work preferences and abilities;
- resume, including education, past work experience and references;
- information on certain health conditions (only where required by law);
- job interview notes;
- assessment results.

2.3 *Sources of Personal Data.* Most of the personal data we process is obtained from you when you file your application with IT Central Station, but we also obtain personal data about you in the course of the application process (for example, during interviews or via job assessments). Other data types may be obtained from third parties, including for example, recruitment agencies. In most cases, you will be required to set up an IT Central Station candidate online account to be able to file your application. You have the opportunity to use

your external social media account, such as Facebook, Google+, LinkedIn, or Microsoft, to facilitate the set-up of your IT Central Station candidate online account. In that event, IT Central Station will be provided with the latest information from your social media account. Additional privacy terms of the social media service providers may apply.

2.4 *Verification and Background Checks.* For certain positions, it may be necessary for us to verify the details you have supplied (for example, in relation to your identity, employment history, academic qualification and professional credentials) and to conduct pre-employment background checks (for example, in relation to previous criminal convictions, financial standing, global watch lists, and sex offender registries where legally permissible). The level of checks will depend on your role and will be conducted at as late a stage as is practicable in the recruitment process and often only after you have been selected for the position. If your application is successful, we will provide further information about the checks involved and will obtain any necessary consent prior to completing such checks.

3. Sharing Personal Data with Others

3.1 *Our Group Companies.* Personal data will only be shared across the IT Central Station group of companies in certain circumstances and where lawful to do so, for example, with limited members of the human resources department or the IT department, both of which may be working for different IT Central Station entities. Whenever we need to share your personal data, we will only do so on a need-to-know basis and with selected employees for tasks within their job responsibilities. IT Central Station takes appropriate steps to ensure that such personnel are bound by duties of confidentiality with respect to your personal data.

3.2 *Service Providers.* We use third party service providers (e.g., Comeet) which provide technical and support services in connection with the application and recruitment process. In providing these services, your personal data will, where applicable, be processed by the service provider on IT Central Station's behalf. We will confirm for any third party that we use that it is able to provide sufficient guarantees regarding the confidentiality and security of your data. We will ensure that any third party that we use complies with our data security standards and international transfer restrictions.

3.3 *Disclosure to Third Parties.* In certain circumstances, we may share and/or be obligated to share your personal data with third parties outside the IT Central Station group of companies for the purposes described above and in accordance with applicable data protection laws. In such cases, these parties will act as controllers of your personal data in their own right, and they will be responsible for compliance with applicable data protection laws. These third parties may be:

- insurance companies
- external advisors (such as legal advisors, accountants)
- benefits providers
- pension trustees.

Your personal data also will be shared with government authorities and/or law enforcement officials if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

4. Processing of Personal Data in Countries outside the EEA.

Your personal data will be processed in or accessed from jurisdictions outside the European Economic Area ("EEA") by us and our service providers (e.g., recruitment companies) in jurisdictions that may not have equivalent data protection laws to those in the EEA for the purposes outlined above. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights.

In this regard, when we transfer your data to our service providers, we use European Commission-approved standard contractual clauses to safeguard the transfer, unless we transfer personal data to a third party that has implemented Binding Corporate Rules or which uses the EU-U.S. Privacy Shield, in which case we may rely on one of those mechanisms to safeguard the transfer.

5. Securing Personal Data

We maintain physical, electronic, and procedural safeguards to protect the confidentiality, integrity, and availability of your personal data. We have taken appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

6 Retention of Personal Data

If your application for employment is successful and you commence employment with IT Central Station, your personal data will be transferred to your personnel file and will be processed for employment purposes. If your application for employment is not successful, we will keep your personal data for a period of 2 years since the last activity on your application for the purposes of (i) contacting you for future job vacancies, and (ii) the establishment, exercise, or defense of legal claims.

7. Your Rights under Applicable Data Protection Laws.

You have the right to request access to, correction of, or deletion of your personal data, to ask for data portability, as well as – depending on the laws of your country - to define instructions on your personal data after your death. You are also entitled to object to the processing of your personal data in certain instances. If we process your personal data based on your consent, you may withdraw it for the future at any time. To make a data subject request, please contact us at privacy@itcentralstation.com.

8. Questions and Queries

If you would like further information about your data protection rights or have a concern regarding your privacy, please contact us at privacy@itcentralstation.com, and we will try to resolve the issue for you. You may also lodge a complaint with a supervisory authority.