

Employee Privacy Notice

1. THE SCOPE OF THIS NOTICE

This Employee Privacy Notice ("Notice") contains the policies, procedures and practices of any of the below companies:

- Constructor Technology AG, with its domicile at Rheinweg 9, 8200 Schaffhausen (CHE-502.198),
- SIT Rolos Bulgaria Ltd, with its domicile at 59 Dr. G.M. Dimitrov Blvd., NV Tower building, 11th floor, Bulgaria, Sofia, 1700 (206851910)
- Constructor Technology Pte. Ltd., with its domicile at 8 Temasek Boulevard #30-01 Suntec Tower Three Singapore 038988
- Alemira Vietnam Co, with its domicile at Centec Business Center (CBC) located at 4/F, 72-74 Nguyen Thi Minh Khai St., District 3, Ho Chi Minh City
- Constructor Technology USA Inc., with its domicile at 8 The Green, Ste A, Dover, Kent, 19901, Delaware, USA
- Constructor Business Services LLC, with its domicile at Makedonska Street no. 12, floor 1, 11000 Belgrade – Stari grad, Serbia
- Constructor Turkey Teknoloji Eğitim Hizmetleri Anonim Şirketi, with its domicile at Ergenekon Mah. Halaskargazi Cad. No: 51 İç Kapı No: 4 Şişli/İstanbul, Türkiye

(the "Company", "We", "Us") pertaining to the collection, use and disclosure of personal data of an employee of the Company.

If you are an individual applying for a job offered by the Company ("Applicant") or an individual in an employment agreement with the Company ("Employee"), then this Notice applies to you.

At the Company, we believe every employee deserves a transparent approach to their personal data. To that end, we have crafted this Privacy Notice ("Notice") to provide members of our workforce with clear, detailed, and easy-to-read information about our privacy practices and how we collect, use, process, and transfer personal data.

2. WHAT THIS PRIVACY NOTICE COVERS

Our Privacy Notice includes information about data we collect in connection with you as an employee.

This Notice applies to Personal Data, as defined below, we collect to comply with our legal obligations, pursue our legitimate interests in conducting our business or to provide you with certain services (collectively, “Services”). This Notice does not apply to anonymized, de-identified or aggregate information if it is not Personal Data.

This Notice describes the rights available to you regarding our use of your Personal Data (defined below). Use of Personal Data collected shall be limited to the legal obligations, legitimate interests covered or the provision the Services and otherwise with your consent. Some information provided to us that may, either alone or when connected with other information to which we may have access, individually identify you.

Under GDPR, we might be both Data Controller and Data Processor (including Data Subprocessor) depending on the nature of the processing of your Personal Data. Please read on to find out about our different roles.

The Company recognizes the confidential nature of the Personal Information in its care and ensures the compliance of itself and its directors, officers, management, employees, representatives and agents including consultants and independent contractors in protecting this Personal Information.

3. WHAT PERSONAL DATA DO WE PROCESS AND WHY DO WE PROCESS IT?

Personal Data is information that relates to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Examples of personal data we collect:

Data categories	Examples of what this means
Identification data	Name, photograph, date of birth, government identifiers, and employee identification number, and badges.
Contact data	Home address, telephone, email addresses, and emergency contact details.
Hiring data	Information related to applicant qualifications, past employment, interview notes, references, immigration status and documentation, residency permits and visas, national ID/passport, and other official documentation in support of authentication or eligibility for employment.
Employment data	Information related to your qualifications, your role at the Company, such as position information, role changes, resignation/termination, resume/CV, office location, employment contracts, performance and disciplinary records, academic/professional qualifications, criminal records data, immigration status and documentation, residency permits and visas, national ID/passport, occupational health assessments and work-related accidents, training and employee resource group participation
Benefits data	Information related to employment benefits we provide to you such as spouse and dependent information, health information, vacation, leaves of absence, and accommodations information.
Performance and management data	Information related to performance evaluations or reviews, disciplinary actions and grievances, and training and development plans.
Financial data	Banking details, tax information, payroll information, withholdings, salary, expenses, company allowances, and commission and stock and equity grants as applicable.

Systems and asset use data

Information required to provide access to the Company's computing resources such as IP addresses, log files, login information, software/hardware inventories, internal communications and video and audio recordings, and information collected by internal applications provided to employees such as employee communications tools and platforms. This also includes asset allocation data and data used for security and business continuity purposes and information required to use Company sites including from CCTV, access, and security controls.

Demographic data

Date of birth, and if you choose to provide, then gender, race/ethnicity, veteran status, disability, sexual orientation and gender expression, as well as information relating to other demographic categories. Employees can view their demographic data in Bamboo (<https://alemira.bamboohr.com/>)

Other information you share with us

Information you choose to provide including hobbies, social preferences, answers to feedback surveys, and participation in programs.

We only process your personal data where we have your consent, a legitimate business reason or legal requirement to do so. The table below outlines the main reasons for processing and the types of data involved.

Why we process your personal data	Data categories we process
Hiring: During the hiring process, we process Applicant personal data to determine suitability and eligibility for a role. This includes verifying qualifications. It may also include administering background checks and establishing your right to work in a specific jurisdiction.	Identification data, contact data, hiring data
Compensation and benefits: We use this information to manage payroll, taxes, and benefits as well as to process work-related claims (e.g., worker compensation, insurance claims, expense and travel management) and leaves of absence	Identification data, contact data, employment data, benefits data, financial data
Training: We use this information to help us with creating and updating Employee training and other development opportunities and enforcing mandatory training completions.	Employment data
Performance reviews: We use this information to review how you are performing at work and to help determine your work performance requirements and career development needs.	Identification data, contact data, employment data, performance and management data, financial data
Legal requirements: We use this information to comply with laws and regulations (e.g. labor and employment laws, health and safety, tax, anti-discrimination laws) or to exercise or defend our legal rights	Identification data, contact data, employment data, hiring data, benefits data, performance and management data, financial data, systems and asset use data, demographic data
Contacts: We use this information internally to compile employee directories or send documents or items to home addresses	Identification data, contact data, employment data

Security & IT: We use this information to maintain the security of the Company's computing resources, assets and premises and, provide you with access to them, to manage our general operations and assets, to provide services to you as necessary for your role, and to protect your personal safety	Identification data, contact data, employment data, hiring data, systems and asset data
Emergencies: We use this information to help us establish emergency contacts for you and respond to and manage emergencies, crises, and business continuity	Identification data, contact data, benefits data
Investigations and Disciplinary actions: We use this information when necessary to investigate and support decisions on disciplinary actions or terminations, conduct grievance management, or when necessary to detect fraud or other types of wrongdoing	Identification data, Contact data, Employment data, Benefits data, Financial data, Systems and asset data
Diversity goals: We use this information as necessary to help us understand the diversity of our workforce and to support core business diversity, equity, and inclusion initiatives	Demographic data
Day-to-day business operation: We may use this information for other legitimate purposes that are reasonably required for day-to-day operations at the Company, such as managing our relationship with our employees, accounting, financial reporting, business analytics, employee surveys, operational and strategic business planning, mergers and acquisitions, real estate management, business travel, and expense management.	Identification data, contact data, employment data, hiring data, benefits data, financial data, systems and asset data, other information you share with us

When we collect your personal data, we generally do so directly from you or from a third party when you have given us permission. We will only use this data for the reasons we originally collected it and if we need to use the data for another legitimate business reason, we will notify you directly and get your permission where required. If we ask you to provide personal data not described above, the reason for doing so will be made clear to you at the point we collect it.

A comprehensive list of personal data processed together with related specifics (such as purpose and duration) is to be found in Annex I to this Notice.

4. LEGAL BASIS TO PROCESS YOUR PERSONAL DATA

If you are from a jurisdiction that requires a legal basis for processing personal data (such as the EEA, Switzerland, or Singapore), the Company's legal basis will depend on the personal data concerned and the context in which we collect it. We will normally collect personal data from you only where we have your consent, we need the data to carry out our employment contract with you, to comply with our legal obligations or exercise rights in the field of employment, or where the processing is in our legitimate interests, provided this is not overridden by your data protection interests or fundamental rights and freedoms. You can see examples of the data we use for our legitimate interests in carrying out our day-to-day business operations in the table above. We also rely on your consent in certain situations — for example, processing sensitive personal data related to your current health status or to provide access to optional social activities.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and let you know whether providing your personal data is mandatory or not, as well as the possible consequences if you do not provide it.

Similarly, if we collect and use your personal data in reliance on our legitimate interests (or those of a third party) that are not listed in the table above, we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us via email at privacy@constructor.tech.

5. DATA CONTROLLERS

The data controller of your personal data is one of the companies that employs you listed in Clause 1 of this Notice.

6. WHAT IS OUR COMMITMENT TO PROCESSING DEMOGRAPHIC DATA?

Global workforce diversity, equity, and inclusion is a priority for us. We collect certain demographic data such as race, ethnicity, sexual orientation, disability, and military status to help us understand the diversity of our workforce and to support core business diversity, equity, and inclusion initiatives. In some circumstances, we may also need to use this data to comply with local laws. We generally collect this information on a voluntary consensual basis, and you are not required to provide it unless it is necessary for us to comply with a legal obligation. We will not share your data without your permission unless we are legally required to do so.

7. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

We do not sell your personal data or share your personal data for the purpose of behavioural advertising, and we do not allow any personal data to be used by third parties for their own marketing purposes. You can see the type of third parties we might need to share your personal data with, and our reasons for doing so, in the table below. We will obtain your consent to any disclosure of your personal data where required by law.

Recipients	Why We Share It
Employees, Contractors, and Constructor Group Companies	To establish, manage, or terminate your employment with the Company
Consultants and Advisors	To seek legal advice from external lawyers and advice from other professionals such as accountants, management consultants
Service Providers	To enable third parties to provide services to you on behalf of the Company such as recruitment providers, financial investment service providers, insurance providers, healthcare providers and other benefits providers, payroll support services.
Partners in Corporate Transactions and their professional advisors	In connection with the sale, assignment or other transfer of all or part of our business
Government Authorities or Law Enforcement	If we in good faith believe we are compelled by any applicable law, regulation, legal process or government authority; or where necessary to exercise, establish or defend legal rights, including to enforce our agreements and policies.
Other Third Parties	• To protect the Company's rights or property; • To protect the Company, our other customers, or the public from harm or illegal activities; • To respond to an emergency which we believe in good faith requires us to disclose personal data to prevent harm; or • With your consent, such as for social events hosted by Employee Resource Groups

Annex II of this Notice includes detailed records on our third parties (processors) and personal data we share with them.

8. HOW DO WE HANDLE INTERNATIONAL TRANSFERS OF PERSONAL DATA?

As a global organization, we may need to transfer your personal data outside your home jurisdiction to Constructor Group companies. These countries may have data protection laws that are different from the laws of your region. We will only transfer personal data to another country in accordance with applicable data protection laws, and provided there is adequate protection in place for the data.

Internal Transfers— We have established and implemented a set of binding corporate rules to ensure adequate protection for internal transfers of personal data between Constructor Group Members in the European Union and elsewhere.

External Transfers— If we need to transfer your personal data outside the Constructor Group to a third party who handles that data on our behalf (e.g. payroll providers), we rely on other agreements that provide an appropriate level of data privacy safety, such as Standard Contractual Clauses.

9. HOW LONG WE KEEP YOUR PERSONAL DATA

Employees— We will keep your data for as long as we need it to carry out the purposes we've described above, or as otherwise required by applicable law. Generally, this means we will keep your data until the end of your employment or contract with us, plus the period of time required by the law of the country you are employed in or a reasonable period of time to respond to any inquiries, deal with legal, tax, accounting, or administrative matters, or to provide you with ongoing pensions or other benefits. We seek to minimize our retention of data wherever possible.

Applicants— If you apply for a job with us, we retain your data to determine your eligibility for a current or future role with us. The retention periods may vary depending on your location and local legal requirements. We generally retain information regarding our hiring for a year from the end of the recruitment process, or for longer if required to do so according to our regulatory obligations or where we believe necessary to establish, defend, or protect our legal rights or those of others. If you have specific questions about how long we retain your data for other jurisdictions please contact us via email at privacy@constructor.tech

When we destroy your Personal Data, we do so in a way that prevents that information from being restored or reconstructed. If you have a specific question about how long we store your data, please reach out to us via email at privacy@constructor.tech.

10. HOW WE COLLECT YOUR PERSONAL DATA

Below are the sources from which we may receive your Personal Data:

- directly from you when you enter into an employment agreement with us,
- from third parties that assist us in providing relevant Services.

We may combine Personal Data that you provide us with other information we have received from you, whether online or offline, or from other sources such as from our service providers to the extent permitted by law.

11. HOW CAN YOU EXERCISE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?

Regardless of whether you are an Applicant or Employee, you have the right to make choices about your personal data. Where applicable and in certain circumstances, these legal rights include:

- The right to update your data if it's out of date, incomplete, or inaccurate;
- The right to request confirmation that we are processing your data and be provided with access to the data we process about you;
- The right to have your data deleted;
- The right to restrict the processing of your data;
- The right to transmit your data to another organization;
- The right to object to the processing of your personal data;
- The right to withdraw consent for data you've provided to us on a consensual basis; or
- The right to obtain information about the entities the Company has shared your data with.

Employees—To exercise other rights, please contact the Privacy Team via email at privacy@constructor.tech.

Applicants— Please contact the recruiter you worked with or the Privacy Team via email via email at privacy@constructor.tech to exercise your rights.

12. HOW DO WE SECURE YOUR PERSONAL DATA?

We use appropriate technical and organizational security measures to protect the security of your personal data both online and offline including the implementation of access controls, firewalls, network intrusion detection, and use of anti-virus software. These measures vary based on the sensitivity of the personal data we collect, process, and store, and the current state of technology. We also take measures to ensure that third parties that process personal data on our behalf also have appropriate security controls in place.

In addition, each Employee has a responsibility to protect data they have access to.

Please refer to our technical and organizational security measures published here to know more about how we secure your personal data: <https://constructor.tech/tom>.

13. WHAT ARE YOUR RESPONSIBILITIES?

Data Accuracy

We need your help to keep our records accurate and current. This means that we need you to be vigilant with keeping information like your address, phone number, and personal email up to date. In some cases, failing to provide us with accurate data will impact our ability to function as a business and to comply with legal obligations.

Data Stewardship

We rely on you to “Be an Owner.” Employees with access to personal data must endeavor to make wise choices about how they use data. This means ensuring that you are thoroughly assessing (1) why you need the data, (2) whether that use fits the uses outlined in Chapter 3 of this Notice, and (3) whether there is another way to get to your goals without using personal data. After assessing, it’s equally important to ensure that you maintain good data security practices for the data in your possession, report data misuse, whether accidental or malicious, and keep up with required training.

Data Confidentiality

We rely on our Employees to keep data confidential. You may use this data only as necessary for the performance of your role and must protect the confidentiality of personal data at all times.

14. HOW DOES THE COMPANY HANDLE DISPUTES RELATING TO PERSONAL DATA?

We hope we can resolve any disputes relating to our data protection practices between us. However, if you have a dispute with us relating to our data protection practices, you can raise your concern or dispute by contacting our Privacy Team either via email at privacy@constructor.tech or by contacting our Data Protection Officer (Peter Suhren, Managing Director, First Privacy GmbH, Konsul-Smidt-Str. 88, 28217 Bremen, Germany, Commercial Register Bremen HRB 34747 HB) via email at office@first-privacy.com.

Right to Complain to a Supervisory Authority — While we hope we can resolve any dispute between us, you have the right to lodge a complaint with the supervisory authority in the country where you work or where you consider any data protection rules to have been breached.

15. CHANGES TO THIS NOTICE

You can see when this Notice was last updated by checking the "Release date" displayed at the cover page of this Notice. If we update this Notice in a way that impacts your rights, we will provide advance notice to you by sending an email via the address we have on file for you. We will comply with applicable law with respect to

any changes we make to this Notice and seek your consent to any material changes if this is required by applicable law.

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Activity Tracking and Behavioral Data	Activity history	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Certificates earned	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Completion rates	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Configurations and settings	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Engagement patterns	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Interactions within the platform	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Learning results	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Activity Tracking and Behavioral Data	Messaging, discussions	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Online presence tracking	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Participation, content shared within groups	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Proctoring settings (video, screenshots, browser restrictions)	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Progress tracking	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Research related inputs	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Test participation	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Activity Tracking and Behavioral Data	Test scores	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Time spent on activities	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Activity Tracking and Behavioral Data	Virtual lab activities	Employee, Ex-employee	Customer support	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Access levels	Employee, Ex-employee	User authentication	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Account activity logs	Employee, Ex-employee	Security and integrity of user access	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Authentication history	Employee, Ex-employee	User authentication	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Consent Records	Employee, Ex-employee	To store proof of user consent for e-signature related legal and compliance purposes	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Authentication and Access Control	Document Content and Metadata	Employee, Ex-employee	To facilitate e-signature operations and preserve integrity of data.	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Email address	Employee, Ex-employee	To verify user identity and provide multifactor authentication	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Government-Issued ID	Employee, Ex-employee	To verify user identity and ensure the authenticity of e-signatures	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Login history	Employee, Ex-employee	Access control	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Messages or notifications sent during the e-signature process	Employee, Ex-employee	To facilitate e-signature operations and preserve integrity of data.	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Name	Employee, Ex-employee	To verify user identity and ensure the authenticity of e-signatures	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Passwords	Employee, Ex-employee	User authentication	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Authentication and Access Control	Persistent cookies	Employee, Ex-employee	User authentication	Article 6 (1)(a): Consent	C>T Service Platform Cloud	As defined in the Cookies Policy or upon withdrawal of consent	Controller
Authentication and Access Control	Phone number	Employee, Ex-employee	To verify user identity and provide multifactor authentication	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Session info	Employee, Ex-employee	Security and integrity of user access	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Timestamps	Employee, Ex-employee	Security and integrity of user access	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Timestamps, IP addresses, geolocation data of e-signed documents	Employee, Ex-employee	To facilitate e-signature operations and preserve integrity of data	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Authentication and Access Control	Tracking cookies	Employee, Ex-employee	User authentication	Article 6 (1)(a): Consent	C>T Service Platform Cloud	As defined in the Cookies Policy or upon withdrawal of consent	Controller
Basic Identifiers	Address	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Address	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Age	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Age	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Age	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Age	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Browser and OS details	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	CV	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Date of birth	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Date of birth	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Date of birth	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Date of birth	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Date of birth	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Device identifiers (MAC address, device ID)	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	C>T Service Platform Cloud	1 year or as applicable as per jurisdiction	Controller
Basic Identifiers	Email address(es)	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Email address(es)	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
			enforcement authorities.				
Basic Identifiers	Email address(es)	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Email address(es)	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Email address(es)	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Email address(es)	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Gender	Applicant	Diversity goals	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable or upon withdrawal of consent	Controller
Basic Identifiers	Gender	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Gender	Employee	Diversity goals	Article 6 (1)(a): Consent	Processors and subprocessors of HR	3 years for employees or as applicable or upon withdrawal of consent	Controller
Basic Identifiers	Gender	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Gender	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	GeoIP location	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	GeoIP location	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law	Article 6 (1)(c): Compliance with a legal obligation	C>T Service Platform Cloud	1 year or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
			enforcement authorities.				
Basic Identifiers	IP address	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	C>T Service Platform Cloud	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	IP address	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	C>T Service Platform Cloud	1 year or as applicable as per jurisdiction	Controller
Basic Identifiers	Name	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Name	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Name	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Name	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Name	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Nationality	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Nationality	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Nationality	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Personal email	Applicant	Contacts	Article 6 (1)(a): Consent	Processors and subprocessors of HR	1 year or upon withdrawal of consent	Controller
Basic Identifiers	Personal email	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Phone number	Applicant	Contacts	Article 6 (1)(a): Consent	Processors and subprocessors of HR	1 year or upon withdrawal of consent	Controller
Basic Identifiers	Phone number(s)	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Phone number(s)	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Phone number(s)	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Phone number(s)	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Phone number(s)	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Place of birth	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Place of birth	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Place of birth	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Place of birth	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Place of birth	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Residential/family/permanent/billing addresses	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Residential/family/permanent/billing addresses	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Residential/family/permanent/billing addresses	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
			enforcement authorities.				
Basic Identifiers	Salary expectation	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Surname	Applicant	Hiring	Article 6 (1)(a): Consent	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Surname	Applicant	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	6 months or as applicable as per jurisdiction or upon withdrawal of consent	Controller
Basic Identifiers	Surname	Employee, Ex-employee	Benefits and insurance	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Basic Identifiers	Surname	Employee, Ex-employee	Employment	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Basic Identifiers	Surname	Employee, Ex-employee	To comply with legal obligations, including the cases where we need to respond to requests by government or law enforcement authorities.	Article 6 (1)(c): Compliance with a legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Compensation Data	Bank account number	Employee, Ex-employee	Compensation and benefits	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	As defined in the Cookies Policy	Controller
Compensation Data	Benefits details	Employee, Ex-employee	Compensation and benefits	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Compensation Data	Leave of absence	Employee, Ex-employee	Compensation and benefits	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Compensation Data	Marital status	Employee, Ex-employee	Compensation and benefits	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Compensation Data	Residence permit	Employee, Ex-employee	Compensation and benefits	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Compensation Data	Salary	Employee, Ex-employee	Compensation and benefits	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Compensation Data	Social security number	Employee, Ex-employee	Compensation and benefits	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Emergency Contact Information	Emergency contact details	Employee	Emergencies	Article 6 (1)(c): Legal obligation	Processors and subprocessors of HRHR	3 years or as applicable as per jurisdiction	Controller
Employment Details	Individual performance metrics	Employee, Ex-employee	Performance review, operational purposes	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Employment Details	Job title	Employee, Ex-employee	Performance review, operational purposes	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Employment Details	Line manager	Employee, Ex-employee	Performance review, operational purposes	Article 6 (1)(b): Performance of a contract	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller

Type of Personal Data	Breakdown of Type	Category of Data Subject	Purpose of Data Processing	Lawful Basis (e.g., GDPR Article)	System or Place of Storage	Retention Period	Controller/Processor
Employment Details	Relationship status	Employee, Ex-employee	Performance review, operational purposes	Article 6 (1)(b): Performance of a contract, Article 6 (1)(c): Legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Investigative Data	Circumstances of incidents (time, place, involved parties)	Employee, Ex-employee	Investigations and disciplinary actions	Article 6 (1)(c): Legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Legal Data	Social security number	Employee, Ex-employee	Legal compliance	Article 6 (1)(c): Legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Legal Data	Tax ID	Employee, Ex-employee	Legal compliance	Article 6 (1)(c): Legal obligation	Processors and subprocessors of HR	3 years or as applicable as per jurisdiction	Controller
Media records	Vdeo and audio recordings	Employee	Customer support	Article 6 (1)(b): Performance of a contract, Article 6 (1)(c): legal obligation	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller
Security & Access	Systems and asset use data	Employee	Security and IT	Article 6 (1)(f): Legitimate interest	C>T Service Platform Cloud	1 year, upon end of employment or applicable legal terms	Controller

Entity Name	Purpose of Processing	Location of Subprocessor	Appropriate Safeguards for Transfers outside the EU	Additional Details
Акаунт Плюс Оод	Payroll services in Bulgaria	Bulgaria	Not applicable	https://accountplus.net/
Lega Expert	Legal services in Bulgaria	Bulgaria	Not applicable	https://www.legaexpert.com/
SB Consulting	E-signatures in Bulgaria	Bulgaria	Not applicable	https://sb-bg.com/bg/
OZOF Doverie	Insurance in Bulgaria	Bulgaria	Not applicable	https://www.ozof-doverie.bg/EN/index.html
Benefit Systems	Sport allowance	Bulgaria	Not applicable	https://benefitsystems.bg/en/gdpr_updated/
Greenhouse Software, Inc.	Application management	Germany	EU-U.S. Data Privacy Framework Swiss-U.S. Data Privacy Framework UK Extension to the EU-U.S. Data Privacy Framework	https://www.greenhouse.com/uk/data-processing-addendum
ProPers AG	Payroll services in Switzerland	Switzerland	Not applicable	https://www.propers.ch/datenschutz-impressum
BDO Turkey	Payroll services in Turkey	Turkey	Not applicable	https://www.bdo.com.tr/en-gb/kisisel-verilerin-korunmasi
Keco Legal	Legal services in Turkey	Turkey	Not applicable	https://www.kecolegal.com/en/privacy-notice
Sistem Global Danışmanlık A.Ş.	Submission services in Turkey	Turkey	Not applicable	https://en.sistemglobal.com.tr/protection-of-personal-data/
Bupa Acibadem Sigorta A.Ş.	Health insurance in Turkey	Turkey	Not applicable	https://www.bupaacibadem.com.tr/kvkk
Deel Inc.	International payroll and related services (employer of record)	US	EU-U.S. Data Privacy Framework Swiss-U.S. Data Privacy Framework UK Extension to the EU-U.S. Data Privacy Framework	https://www.deel.com/legal/privacy-policy/
Fragomen	Work pass applications	Singapore	Not applicable	https://www.fragomen.com/
Sleek	Payroll services in Singapore	Singapore	Not applicable	https://sleek.com/sg/
Diotsiaci Asia	Health insurance in Singapore	Singapore	Not applicable	https://asia.diot-siaci.com/

Entity Name	Purpose of Processing	Location of Subprocessor	Appropriate Safeguards for Transfers outside the EU	Additional Details
Bamboo HR	HR services	Worldwide	EU-U.S. Data Privacy Framework Swiss-U.S. Data Privacy Framework UK Extension to the EU-U.S. Data Privacy Framework	
BDO d.o.o.	Payroll services in Serbia	Serbia	Not applicable	https://www.bdo.co.rs/en-gb/home
Atanasković-Božović Attorneys at Law	Legal services in Serbia	Serbia	Not applicable	https://www.atanaskovic-bozovic.com/en/
Wiener Städtische osiguranje	Health provider in Serbia (Daily health as a global insurer)	Serbia	Not applicable	https://wiener.co.rs/

Please refer to the <https://constructor.tech/subprocessors> website to inquire about subprocessors the Company might share your personal data with relying on Article 6 (1)(b): Performance of a contract of the GDPR (i.e. your employment agreement) as the lawful basis for data processing.