

# Employee Privacy Notice

This document is the property of Constructor Technology. It must not be reproduced in whole or in part or otherwise disclosed without prior written consent from Constructor Technology.

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**IMPORTANT:**

Constructor Technology (C>T) policies are designed **to implement best practices and smooth processes, help C>T comply with the legal and regulatory environment** and to **reduce C>T's business risks**. Therefore, C>T Policies should be respected by all Constructor employees, always **with good judgment and common sense**.

C>T is committed to respecting all applicable laws and regulations and expects the same from all C>T employees. Nothing in C>T policies is intended to override any mandatory provision of applicable law. In case of discrepancies between a provision of this policy and applicable law, applicable law shall prevail over said policy provision.

If you have any questions about this policy or notice any contradiction with mandatory applicable law in your region, please contact: [privacy@constructor.tech](mailto:privacy@constructor.tech).

Release date: June 10, 2025

## 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,
- CAZ BİLİŞİM HİZMETLERİ TİCARET A.Ş. . Esentepe Mah. Akademiyolu Sk. No: 10 D/206 Serdivan/Sakarya

(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:

| <b>Data categories</b>                 | <b>Examples of what this means</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Identification data</b>             | Name, photograph, date of birth, government identifiers, and employee identification number, and badges.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Contact data</b>                    | Home address, telephone, email addresses, and emergency contact details.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Hiring data</b>                     | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Employment data</b>                 | 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.                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Benefits data</b>                   | Information related to employment benefits we provide to you such as spouse and dependent information, health information, vacation, leaves of absence, and accommodations information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Performance and management data</b> | Information related to performance evaluations or reviews, disciplinary actions and grievances, and training and development plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Financial data</b>                  | Banking details, tax information, payroll information, withholdings, salary, expenses, company allowances, and commission and stock and equity grants as applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Systems and asset use data</b>      | 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. This category also includes data collected during recorded video conferencing sessions (e.g., Zoom, Microsoft Teams), such as your name, voice, image, chat contributions, and any screen sharing or file presentations. In some cases, AI-based tools may generate transcripts or summaries based on meeting content. |
| <b>Training evaluation data</b>        | 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. This includes data collected via internal tools and proctoring systems (e.g., Proctor) during online training or assessments: image, voice, screen sharing, and behavioural indicators. AI-based systems may flag potential anomalies, which are then reviewed by human exam administrators. |
| <b>Demographic data</b>                    | 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 ( <a href="https://alemira.bamboohr.com/">https://alemira.bamboohr.com/</a> ).                                                                          |
| <b>Other information you share with us</b> | 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 and in line with principles of data and purpose minimization as appropriate under the applicable law to ensure that only necessary and relevant information is collected, stored, and processed.

The table below outlines the main reasons for processing and the types of data involved.

| <b>Why we process your personal data</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Data categories we process</b>                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>Hiring:</b> 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                                                                                  |
| <b>Compensation and benefits:</b> 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                                               |
| <b>Training:</b> We use this information to help us with creating and updating Employee training and other development opportunities and enforcing mandatory training completions.                                                                                                                                                                                                                                                                                                                                                     | Employment data                                                                                                                 |
| <b>Performance and productivity reviews:</b> 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, systems and asset use data |
| <b>Internal training and assessment integrity:</b> We use remote proctoring technology (Proctor) during internal training assessments to help maintain exam integrity, verify presence, and monitor for potential violations of test conditions. The system captures video, audio, and screen activity during exams. AI-based tools may assist with monitoring and generate alerts or summaries, which are always reviewed by human proctors. This processing is carried out under our legitimate interest in ensuring fair evaluation | Identification data, systems and asset use data, employment data, media records                                                 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>(Art. 6(1)(f)) and/or as part of our employment contract with you (Art. 6(1)(b)).</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                               |
| <b>Legal requirements:</b> 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 |
| <b>Contacts:</b> We use this information internally to compile employee directories or send documents or items to home addresses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Identification data, contact data, employment data                                                                                                                            |
| <b>Security &amp; IT:</b> 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                                                                                       |
| <b>Emergencies:</b> 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                                                                                                                              |
| <b>Investigations and Disciplinary actions:</b> 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                                                                     |
| <b>Diversity goals:</b> 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                                                                                                                                                              |
| <b>Day-to-day business operation:</b> 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. This also includes the recording and use of virtual meetings (e.g., Zoom, Microsoft Teams) to support knowledge sharing, collaboration, and business continuity, particularly across global time zones. | 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](mailto: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                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Employees, Contractors, and Constructor Group Companies</b>            | To establish, manage, or terminate your employment with the Company.                                                                                                                                                                                 |
| <b>Consultants and Advisors</b>                                           | To seek legal advice from external lawyers and advice from other professionals such as accountants, management consultants.                                                                                                                          |
| <b>Service Providers</b>                                                  | 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. |
| <b>Partners in Corporate Transactions and their professional advisors</b> | In connection with the sale, assignment or other transfer of all or part of our business                                                                                                                                                             |
| <b>Government Authorities or Law Enforcement</b>                          | 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.           |
| <b>Other Third Parties</b>                                                | To protect the Company's rights or property;<br>To protect the Company, our other customers, or the public from harm or illegal activities;                                                                                                          |

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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.

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

In certain cases, third parties not listed in Annex II may also become aware of your name and company email address. This occurs strictly on a minimal and necessary basis, solely to facilitate contact for matters where we have a legitimate interest, such as professional collaborations, industry events, or service-related communications. Any such processing will be conducted in line with our commitment to data minimization and privacy protection.

## 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](mailto: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](mailto: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](mailto:privacy@constructor.tech).

**Applicants**— Please contact the recruiter you worked with or the Privacy Team via email via email at [privacy@constructor.tech](mailto: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. Where AI-based tools are used for meeting transcription or summarization, access is restricted to authorized personnel, and outputs are retained in accordance with our internal policies.

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](mailto: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](mailto: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                              | 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 |
|-----------------------|-------------------|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|------------------------------------|----------------------------------------------|----------------------|
|                       |                   |                          | law 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 | 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 |
|-----------------------|-------------------|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|------------------------------------|-----------------------------------------------------------------------------|----------------------|
|                       |                   |                          | law 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 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     | 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           |
| 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           |

| 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    | 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           |
| 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           |

| 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             | 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           |
| 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           |

| 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 |
|-----------------------|------------------------------------------------------------|--------------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|------------------------------------|----------------------------------------------------------|----------------------|
| 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         | Video and audio recordings                                 | Employee                 | Customer support, internal collaboration, knowledge sharing, and business continuity | 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                                                                                                            | <a href="https://accountplus.net/">https://accountplus.net/</a>                                                                       |
| Lega Expert                    | Legal services in Bulgaria                                      | Bulgaria                 | Not applicable                                                                                                            | <a href="https://www.legaexpert.com/">https://www.legaexpert.com/</a>                                                                 |
| SB Consulting                  | E-signatures in Bulgaria                                        | Bulgaria                 | Not applicable                                                                                                            | <a href="https://sb-bg.com/bg/">https://sb-bg.com/bg/</a>                                                                             |
| OZOF Doverie                   | Insurance in Bulgaria                                           | Bulgaria                 | Not applicable                                                                                                            | <a href="https://www.ozof-doverie.bg/EN/index.html">https://www.ozof-doverie.bg/EN/index.html</a>                                     |
| Benefit Systems                | Sport allowance                                                 | Bulgaria                 | Not applicable                                                                                                            | <a href="https://benefitsystems.bg/en/gdpr_updated/">https://benefitsystems.bg/en/gdpr_updated/</a>                                   |
| Greenhouse Software, Inc.      | Application management                                          | Germany                  | EU-U.S. Data Privacy Framework<br>Swiss-U.S. Data Privacy Framework<br>UK Extension to the EU-U.S. Data Privacy Framework | <a href="https://www.greenhouse.com/uk/data-processing-addendum">https://www.greenhouse.com/uk/data-processing-addendum</a>           |
| ProPers AG                     | Payroll services in Switzerland                                 | Switzerland              | Not applicable                                                                                                            | <a href="https://www.propers.ch/daten-schutz-impressum">https://www.propers.ch/daten-schutz-impressum</a>                             |
| BDO Turkey                     | Payroll services in Turkey                                      | Turkey                   | Not applicable                                                                                                            | <a href="https://www.bdo.com.tr/en-gb/kisisel-verilerin-korunmasi">https://www.bdo.com.tr/en-gb/kisisel-verilerin-korunmasi</a>       |
| Keco Legal                     | Legal services in Turkey                                        | Turkey                   | Not applicable                                                                                                            | <a href="https://www.kecolegal.com/en/privacy-notice">https://www.kecolegal.com/en/privacy-notice</a>                                 |
| Sistem Global Danışmanlık A.Ş. | Submission services in Turkey                                   | Turkey                   | Not applicable                                                                                                            | <a href="https://en.sistemglobal.com.tr/protection-of-personal-data/">https://en.sistemglobal.com.tr/protection-of-personal-data/</a> |
| Bupa Acibadem Sigorta A.Ş.     | Health insurance in Turkey                                      | Turkey                   | Not applicable                                                                                                            | <a href="https://www.bupaacibadem.com.tr/kvkk">https://www.bupaacibadem.com.tr/kvkk</a>                                               |
| Deel Inc.                      | International payroll and related services (employer of record) | US                       | EU-U.S. Data Privacy Framework<br>Swiss-U.S. Data Privacy Framework<br>UK Extension to the EU-U.S. Data Privacy Framework | <a href="https://www.deel.com/legal/privacy-policy/">https://www.deel.com/legal/privacy-policy/</a>                                   |
| Fragomen                       | Work pass applications                                          | Singapore                | Not applicable                                                                                                            | <a href="https://www.fragomen.com/">https://www.fragomen.com/</a>                                                                     |
| Sleek                          | Payroll services in Singapore                                   | Singapore                | Not applicable                                                                                                            | <a href="https://sleek.com/sg/">https://sleek.com/sg/</a>                                                                             |

| Entity Name                          | Purpose of Processing                                        | Location of Subprocessor | Appropriate Safeguards for Transfers outside the EU                                                                       | Additional Details                                                                                                                    |
|--------------------------------------|--------------------------------------------------------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Diotsiaci Asia                       | Health insurance in Singapore                                | Singapore                | Not applicable                                                                                                            | <a href="https://asia.diot-siaci.com/">https://asia.diot-siaci.com/</a>                                                               |
| Bamboo HR                            | HR services                                                  | Worldwide                | EU-U.S. Data Privacy Framework<br>Swiss-U.S. Data Privacy Framework<br>UK Extension to the EU-U.S. Data Privacy Framework |                                                                                                                                       |
| BDO d.o.o.                           | Payroll services in Serbia                                   | Serbia                   | Not applicable                                                                                                            | <a href="https://www.bdo.co.rs/en-gb/home">https://www.bdo.co.rs/en-gb/home</a>                                                       |
| Atanasković-Božović Attorneys at Law | Legal services in Serbia                                     | Serbia                   | Not applicable                                                                                                            | <a href="https://www.atanaskovic-bozovic.com/en/">https://www.atanaskovic-bozovic.com/en/</a>                                         |
| Wiener Städtische osiguranje         | Health provider in Serbia (Daily health as a global insurer) | Serbia                   | Not applicable                                                                                                            | <a href="https://wiener.co.rs/">https://wiener.co.rs/</a>                                                                             |
| Takeaway                             | Food service provider in Bulgaria                            | Bulgaria                 | Not applicable                                                                                                            | <a href="https://www.takeaway.com/bg-en">https://www.takeaway.com/bg-en</a>                                                           |
| Sparkybit                            | Staffing provider                                            | Germany                  | Not applicable                                                                                                            | <a href="https://www.sparkybit.com/">https://www.sparkybit.com/</a>                                                                   |
| HR Labs                              | Recruitment services                                         | Bulgaria                 | Not applicable                                                                                                            | <a href="https://www.hrlabs.bg/">https://www.hrlabs.bg/</a>                                                                           |
| JK Recruitment                       | Recruitment services                                         | Bulgaria                 | Not applicable                                                                                                            | <a href="https://www.jkreruitment.eu">https://www.jkreruitment.eu</a>                                                                 |
| Recruitify                           | Recruitment services                                         | Bulgaria                 | Not applicable                                                                                                            | <a href="https://recruitify-global.com/">https://recruitify-global.com/</a>                                                           |
| OfficeRnD Limited                    | Coworking and workplace management services                  | United Kingdom           | Adequacy decision for UK transfers, SCCs for transfers outside the EEA, Schrems II compliance acknowledgment              | <a href="https://www.officernd.com/privacy/">https://www.officernd.com/privacy/</a>                                                   |
| Individual: Tuğba Pekşen             | English lessons provider in Turkey                           | Turkey                   | Not applicable                                                                                                            | <a href="https://tr.linkedin.com/in/tu%C4%9Fba-pek%C5%9Fen-962865253">https://tr.linkedin.com/in/tu%C4%9Fba-pek%C5%9Fen-962865253</a> |

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.