

**APPROVED BY BOARD OF OÜ SALTO X**  
Tallinn, March 23, 2022

**PRIVACY POLICY**  
**for the recruitment process**

**History of modifications**

Version	Entry into force	Changes
1.0	23 March 2022	New document

This Privacy Policy explains how OÜ Salto X (registry code 16360806) (“Salto X”, “we”, “us”) processes information about you during the recruitment process when you apply for a vacancy at Salto X as an employee or a contractor. You will also find information about your rights regarding the personal data you provide to us.

If you have any questions regarding this Privacy Policy, contact our DPO by writing an email to [dpo@saltox.co](mailto:dpo@saltox.co).

Your personal data controller is Salto X.

### **1. What personal data do we process?**

Salto X may process the following personal data which you provide by submitting application, resume, CV, motivation letter and any other documents/information added to your application or during the job interview:

1. **Identification data**, for example, your name, surname, personal identification number, photo;
2. **Personal information and family information**, for example, your data of birth, gender, information about your family members, your marital status
3. **Contact Information**, for example, your address, phone number, e-mail;
4. **Education and occupation data**, for example, information about your education, previous work experience, contact information of your current/previous employer, other work related experience;
5. **Other information** provided in your CV and application;
6. **Information received from you during the interview process**, for example, any kind of notes written down during the interview;
7. **Background check information**, for example, information obtained through requests of the feedback, data about criminal convictions, confirmation of your work experience/ education.

Unless required by law, Salto X will not require you to provide any sensitive information such as – data related to health, ethnicity, religious or political beliefs. You shall not provide Salto X with such information that is not necessary for the initial recruitment process.

If Salto X is willing to make a job offer to you, at the final stage of the recruitment process, Salto X obtains your consent prior to contacting third parties, such as referees, for references or further information.

Salto X may process your personal data collected from the third parties:

1. from public external sources, such as – LinkedIn, Facebook, Instagram, Twitter and other public networks;
2. from recruitment agencies with whom you have registered an interest to be recruited.

## **2. Why do we process your personal data and what is the legal basis for processing?**

We process your personal data for the reasons listed below, but mainly to ensure the recruitment process, i.e., to be able to evaluate your fit for the position you have applied for, to complete the selection procedure and, where necessary, to make you a work offer. In each case the legal basis for processing your personal data is one or more of the legal bases mentioned below.

We do not use your personal data for automated decision making.

Please note that the lists of personal data processing activities included in this section are not exhaustive, they are illustrative.

### **1. Your consent**

When you apply for the vacancy - you submit the application, resume, CV, motivation letter and any other documents added to you application or during the job interview - you consent that Salto X will process your personal data according to this Privacy Policy and applicable data protection laws, including the General Data Protection Regulation.

### **2. Legal or regulatory obligation**

Local laws and regulations require us to process the personal data to comply with our legal or regulatory obligations, for example, to:

1. preventing illegal working;
2. complying with health and safety obligations;
3. ensuring the safety and security of our systems;
4. responding to government statistical monitoring;

5. assessing fitness and propriety of individuals for the purpose of relevant regulatory requirements to which we must adhere;
6. liaising with relevant tax authorities and other government entities or agencies in relation to attachments of earnings and similar deductions.

### **3. The legitimate interest**

Data protection laws, including General Data Protection Regulation, allows Salto X to process personal data where it is necessary for the purposes of our legitimate interests as a business, for example:

1. recruitment processes (including negotiation and communicating with you in relation to your application);
2. considering your suitability for employment/work, taking up references, and conducting appropriate checks;
3. dealing with any legal disputes involving you;
4. keeping our IT system safe and secure; and
5. reporting to government authorities.

### **3. Who can receive your personal data?**

Your personal data will be available to Salto X. If you have submitted a general application to any open vacancy, your data may be used in other recruitment processes of Salto X if we have another open vacancy most suitable for you.

Your personal data may be shared with third parties who provide services during the recruitment process (for example, hosting and data storing services, HR tools, legal, IT and other advisors, when reasonably required). These service providers may only receive the minimum required amount of personal data and only when necessary. We will share your personal data only with such service providers who have undertaken to comply with confidentiality requirements as well as obligations set out in applicable data protection laws and our cooperation agreements.

If any of the service providers are located outside the European Union or there are other legitimate reasons, we may need to transfer data outside the European Union. In such a case, the personal data will be transferred in compliance with the requirements of the General Data Protection Regulation.

If there are any complaints about the recruitment process or we need to protect our legal rights, we may also share information with the relevant public authorities. We may need to share your information if we are required to do so in accordance with the applicable laws or we have received such a request from a public authority.

#### **4. How long do we keep your personal data?**

If you have indicated that you are interested in other suitable vacancies or submitted a general application, then we will retain your personal data for 2 years. After this period, we will erase or anonymize your data and use it only for statistical purposes.

If you have clearly indicated that you are not interested in other suitable positions, your personal data will be anonymized 3 (three) months after the end of the recruitment project, if Salto X does not have any legal basis to store your personal data for a longer period of time.

We may continue to store copies of your personal data when reasonably necessary to comply with our legal obligations, to resolve disputes between us and/or to protect our legal interests.

#### **5. What are your rights?**

As a data subject you have certain rights in relation to the processing of your personal data:

1. You have the right to request access to your personal data.
2. If you believe that the data we have on you is outdated, incorrect or incomplete, you have the right to correct or amend it.
3. You also have the right to data portability and receive your data for transmission to another controller.
4. Under certain circumstances, you have the right to request restriction of processing.
5. If we process your personal data based on our legitimate interests, you have the right to object to such processing. If we receive such an objection, we will no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

6. You have the right to withdraw your consent for the processing of your data, which is based on consent. Revoking of consent will not affect the lawfulness of processing based on consent before its withdrawal.
7. You can request erasure of your personal data. Please note that we will not be able to delete all the personal data, for example, data which we are obliged to retain in accordance with applicable laws or which we require for the establishment, exercise or defence of legal claims.

You can exercise your rights by submitting your request in a written form to the email address [dpo@saltox.co](mailto:dpo@saltox.co). We will evaluate such requests in accordance with the applicable law and will respond within 30 days.

Please note that we will need to verify your identity before we disclose any information, therefore we may ask you to give us additional information and identify yourself.

If you think your privacy rights have been breached, you may lodge a complaint with the relevant public authority in the EU Member State of your residence. Contact details of such authorities can be found here:

[https://edpb.europa.eu/about-edpb/about-edpb/members\\_en#member-lv](https://edpb.europa.eu/about-edpb/about-edpb/members_en#member-lv).

## **6. Privacy Policy changes**

We may occasionally amend this Privacy Policy. Any amendments will be posted on our website. The version of this Privacy Policy is effective as of 23 March 2022.