

Policy Number: LAW-POLY-003	Policy Title: Candidate Data Privacy Policy	Effective Date: 29-Nov-2021
Policy Owner: Chief Legal Officer		Revision Date: 15-JUL-2023

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REVISION HISTORY **INTRODUCTION:**

Quantinuum (the “Company”, “we”, “us” or “our”) is a world leading quantum computing company. We are committed to safeguarding the privacy of information provided to us.

This Candidate Data Privacy Policy (“Policy”) is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of the Company or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.

This Policy is the property of the Company. It is the reader’s responsibility to review the intranet publication of this policy to ensure the most current version is being referenced before taking action based on this printed copy, which may be outdated.

This privacy policy (“Candidate Privacy Policy”) explains how we may collect and use information that we obtain about candidates for employment at Quantinum (“candidates”, “applicants”, “you”, or “your”) via our website (the “site” or “sites”) and the Lever platform, whether online or offline (the “Services”) and your rights in relation to such information. If you have any questions about this, please contact compliance@quantinum.com.

Please note that if you are already a Quantinum employee you can refer to the Quantinum Global Data Privacy Policy and the U.S. Personnel Privacy Notice or your jurisdiction-specific employee handbook as applicable. The aim of this Candidate Privacy Policy is to give you more detailed information about our processing of your personal information in relation to the services.

Where applicable for local data security laws, Quantinum will be considered the data controller of your personal information, which means we determine and are responsible to you for how your personal information is used. The table in the Annex sets out the categories of personal information we collect about you and how we use that information. That table also lists the legal bases upon which we process your personal information.

PURPOSE:

This Candidate Privacy Policy applies to candidates who apply for jobs at the Company. This means individuals or companies who apply to work at the Company on a permanent or temporary basis. For privacy considerations on all other relationships, please contact compliance@quantinum.com.

This Candidate Privacy Policy provides you with certain information that must be provided under the General Data Protection Regulation (*EU* 2016/679) (GDPR) and if required by any other applicable local data protection laws.

APPLICABILITY:

LOCATION(S): ALL

BUSINESS UNIT(S): ALL

DISTINCTIONS: Applies to the Company and its operating units, and (subject to legally required variations due to application of any jurisdiction specific and other local laws), to direct and

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indirect subsidiaries and joint ventures where the Company has a controlling interest. This includes all employees, sub-contractors, third party employees and Company resource users.

APPLICABLE LAW:

The requirements in this Candidate Privacy Policy apply except where a particular jurisdiction's Law and/or contractual obligations impose more detailed or stricter requirements relating to data privacy, in which case that Law or those contractual obligations will apply and take precedence.

POLICY:

1.0. Information that we collect

We have set out the data that we collect from you below. To process your application, we ask you to provide personal information about yourself, for example when you apply for a particular job vacancy through our Services or, in case you are already a Quantinum employee, during your employment relationship. All information is provided on a voluntary basis and you determine the extent of information you provide to Quantinum. Please bear in mind that some information may be necessary to complete an evaluation of your application and if it is not provided, our ability to consider you as a candidate may be limited.

We have tried to be comprehensive here to give you a full picture but want to let you know that we will not collect all of this information in all circumstances. As a general rule, we will collect more information from you the further along the recruitment journey proceeds, and for all new joiners we conduct pre-employment screening checks which may require that we are furnished with some, or all of the information identified below.

1.1 Information you provide us

- **Contact information:** such as your name, address, email address, telephone number and emergency contact details.
- **Qualification information:** such as a copy of your CV, qualifications, skills, and experience.
- **Past employment history:** employment history including your current level of remuneration and benefit entitlements.
- **Sensitive personal data:** such as disabilities or health conditions for you only

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so much as they help us facilitate your recruitment or employment at the Company.

- **Financial information:** if you are self-employed as a contractor, we might also ask for information like Companies House information, insurance details and tax registration details.
- **Right to work and ID information:** such as your passport, visa or drivers' license. We will not collect this in all circumstances and generally do so only after we have made a job offer.

During the recruitment process, we generally do not collect or process any "Sensitive Personal Information". Sensitive Personal Information includes the following: information that reveals your racial or ethnic origin, religious, political, or philosophical beliefs, or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health, sex life, or sexual orientation.

However, there are circumstances in which we are required or permitted by local law to process Sensitive Personal Information. For example, the Company may be required to collect information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws or for government reporting obligations. Similarly, information about your physical or mental condition may be collected in order to consider accommodations we need to make for the recruitment process and/or subsequent job role. You may also provide, on a voluntary basis, other Sensitive Personal Information during the recruiting process.

If you are applying as Candidate in the UK or the EEA please see "[Additional GDPR Disclosures](#)" for more information about the personal information we process and why.

If you are applying as Candidate in the US, we are an equal opportunity employer. Qualified applicants will be considered without regard to age, race, creed, color, national origin, ancestry, marital status, affectional or sexual orientation, gender identity or expression, disability, nationality, sex, religion, or veteran status.

1.2 Information we may collect or use while we interact with you

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- **Data about your interactions with us:** such as information about how you communicate with us (by phone or email). For more information on this, please contact compliance@quantinum.com.
- **Technical data:** such as IP addresses (including the general information in such address, such as city, county and postcode), login details and other information about your mobile devices, browser types and browser language. For more information on this, please contact compliance@quantinum.com.
- **Cookie Data:** We may automatically collect certain information from you about your visit to our sites using “cookies” and other similar tracking technologies. For further information about the cookies we use on the sites through which you submit your application, please read our [Cookie Notice](#).

1.3 Information that is publicly available

- **Social network or online job sites:** such as LinkedIn or other social networking pages linked to your name or email address, as well as other job sites or your current employer’s website. You may also choose to provide us with access to certain personal information stored by third parties (for example, LinkedIn, Twitter, Google or Facebook). By authorizing Quantinum to have access to this information, you agree that we may collect, store and use this information in accordance with this Candidate Privacy Policy.
- **Financial Check:** run against publicly available records to report any negative financial information.
- **Directorship Search:** information of both current and past directorships along with highlighting any disqualifications from being a director.

1.4 Information provided by others

We may collect information from third parties who are lawfully entitled to share your information with us, for example:

- **Recruitment businesses:** personal information such as your contact details, qualification information and past employment history may also be shared with us by recruitment businesses that we work with. This may also include employment agencies, background/employment check or identity verification service providers.
- **Former employers:** Once a job offer has been made, we may collect personal information about you from third parties such as references supplied by former

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employers. For referrals, the person who is referring you will be responsible for obtaining your consent to provide us with your personal information.

- **Academic Institutions and Training or Certification Providers:** we may require other background information provided or confirmed by such institutions.
- **Criminal Records Check:** any data obtained through criminal records checks.
- **Driving License Check** - In the UK, conducted for roles requiring driving, via the DVLA for any data including any current endorsements and any driving bans.
- **Media Search:** any negative media results reported from online sources such as news articles.
- **Worldwide Sanctions & International Watch Lists Check:** data gained through a search of various governmental and other proprietary databases for inclusion in governmental sanctions, enforcements, watch-lists and blacklists.
- **Company team members:** We may also operate an internal recruitment scheme, so personal information such as your contact details, qualification information and past employment history may also be shared with us by members of the current Company team.

1.5 Special Categories of Personal Information

We may also collect certain types of personal information from you where we have a legal obligation to do so, or the information is relevant to your future working environment at Quantinum, or for the future provision of employment benefits or with your explicit consent such as:

- **Government-issued identification number** (such as a social security number).
- **Demographic information**, which may include information about protected classifications such as your age, gender, race, sexual orientation, marital status, or veteran status.
- **Health information** (for example, to accommodate any disability you may have or dietary restrictions).
- **Information relating to a person's political opinions or trade union membership.**
- **Information about an individual's criminal offenses or convictions**, as well as any other information deemed sensitive under applicable data protection laws. Where permitted by law and to the extent applicable, Quantinum may also need to carry out background and/or criminal checks to determine your suitability for an open position or opportunity at Quantinum.

We do not require you to provide us with sensitive personal information unless it is necessary for the purposes of carrying out our obligations or exercise of specific rights

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according to legal and regulatory requirements (for example for equal opportunity monitoring or internal policies related to diversity and anti-discrimination), or unless you have provided your explicit consent in accordance with local laws. The provision of this information will be entirely voluntary.

Quantinum is committed to an inclusive and diverse workforce. By providing us with your equal opportunity data, you allow us to better understand our employee profile in terms of equal opportunity data and the actions we may need to take to attract, promote, and retain a diverse workforce regardless of age, disability, gender, race, religious or philosophical beliefs and sexual orientation.

1.6 How we use this information

It's important that you understand what we'll do with the data that we hold about you, as well as the lawful reasons we are allowed to do this.

We use this information for the following purposes:

Fulfilling our legal and regulatory obligations

Some of the information we collect is to fulfil legal obligations, such as ensuring that all our employees have the right to work in a specific jurisdiction. We may also need to comply with applicable legal and regulatory requirements, court orders, disclose information to law enforcement agencies, or to establish, exercise or defend a legal claim.

With your consent

We will only record any sensitive personal data about you with your explicit consent.

For our legitimate business interests

We need to use your personal information for our legitimate business interests. This means that using your information is necessary for us to build our business and find great people to work with us. We consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. Our legitimate interests include:

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- Identifying and recruiting potential future Company employees.
- Assessing skills, qualifications and experience of potential future Company employees.
- Verifying accuracy of information provided by potential future Company employees.
- Determining suitability of candidates as future Company employees.
- Evaluating your application and making hiring decisions.
- Communicating with you and informing you about the recruitment and/or your application(s) or any other required communications.
- Employment and corporate management (for example, establishing a basic employment record if you are hired). Note that, if you are offered and accept employment with Quantinum, the information collected during the application and recruitment process will become part of your employment record.
- Carrying out aggregated reports/analysis regarding candidates' activity data (e.g., career site traffic, candidate funnel, source of hire, recruiting campaign success, etc.).
- Ensuring your safety and security.
- Equal opportunities monitoring for our recruitment.

If you have questions about the lawful basis on which we collect and use your information, you can email our Data Protection Officer at compliance@quantinum.com.

1.7 Automated processing and profiling

Subject to your express consent (which you voluntarily provide when joining our Talent Community or when checking the appropriate consent box during the application process), we conduct 'profiling' to evaluate your suitability for particular job opportunities. This involves using a matching algorithm that is able to evaluate your employment profile and predict your eligibility for a particular job opportunity. We carry out this automated processing for the purposes of:

- (i) helping recruiters match candidates' profiles to job opportunities by suggesting candidates for consideration for a specific job opportunity; and
- (ii) sending personalized job recommendations to you based on your profile and/or preferences or other information that may be of interest for you such as Quantinum news, webinars and events.

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Please note that based on this profiling, you may not be considered for certain job opportunities unless you have applied for them directly.

We do not make hiring decisions based solely on automated decision-making processes and/or profiling. Your personal information will be subjected to human-made decisions as the ultimate hiring decision will be made by the recruiters or hiring manager.

1.8 Legal basis for processing your personal information

Certain jurisdictions require Quantinum to have a legal basis for processing personal information. Where applicable law requires us to justify our processing activities, our legal basis for collecting and using the personal information as described in this Candidate Privacy Policy will depend on the personal information concerned and the specific context in which we collect it.

a) **Consent.** In general, we will normally collect personal information from you where we have your consent to do so and where we need your personal information to process your application. By accessing our website/portal, joining our Talent Community or applying for one of our job positions, you provide your consent to Quantinum to collect and further process the personal information described above for the purposes described in this Candidate Privacy Policy. You may **withdraw your consent** at any time by sending us an email to compliance@quantinum.com.

b) **Legitimate interests.** In Quantinum's legitimate interests, namely the recruitment, selection, evaluation and appointment of new employees and the management and administration of the recruitment and the HR process to the extent our legitimate interests are not overridden by your fundamental rights and freedoms.

c) **Legal obligations.** Compliance with Quantinum's legal obligations where employment law or other laws require the processing of your personal information (for example to the extent the law requires the monitoring equality of opportunity and diversity).

d) **Vital interests.** We may also need your personal information to protect your vital interests (for example, health and safety reasons if you attend an interview at our site).

Note that, where you have given use your consent to process certain equal opportunity information, such as personal information relating to your gender, ethnicity, religion, and sexual orientation, we may anonymize and aggregate this information and store it

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in such form that does not identify you, for the purpose of monitoring and improving the application process.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please send an email to compliance@quantinum.com.

2.0. Sharing your Information

2.1 When we share your information within the Company

Your information may be shared internally within the Company for the purposes of the recruitment exercise and evaluating your profile and consideration for any recruitment opportunities throughout Quantinum. We restrict access to personal information to people who need to know that information and who are subject to contractual confidentiality requirements.

During the recruitment process, your information may be shared with members of our HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and members of our operational team if access to the data is necessary for the performance of their roles.

If you are already a Quantinum employee, please note that some sections on your profile are public and, therefore, visible to all Quantinum employees (specifically, your name, title, photograph, skills, interest areas, work experience and education). However, such sections are editable and you will be able to choose which information about you is shown in your profile. Please note that the career goals, relocations and profile status "open to new opportunities" sections will not be public and, therefore, not visible to all Quantinum employees (only to Quantinum's Talent Team).

2.2 Sharing Information across our Global Network

The Company has a global presence, and as such, we may sometimes need to share your information with our offices, branches and subsidiaries around the world.

If, in the future, we re-organize or transfer all or part of our business, we may need to transfer your information to new entities or third-parties through which our business will be carried out. We make sure that such third parties won't use your personal data for

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their own purposes and we only permit them to use it in accordance with our instructions and the law. This includes with the following types of organizations:

- Trusted businesses or persons: who process your information for us for the purposes set out above, based on our instructions and as set out in our Candidate Privacy Policy and any other appropriate confidentiality and security measures. This may include third-party service providers that perform specific services on our behalf (for example, recruitment and outsourcing staffing providers and analytics providers). Such third parties may vary depending on your country and will change from time to time.
- People you have authorized us to share data with: once a job offer has been made, we may need to share your data with people whose details you have provided us, such as former employers to obtain references for you.

2.3 Sharing Personal Data Outside of the EEA

During the interview and hiring process, we may be required to share your personal data with organizations outside of the European Economic Area. We will only do so if we have ensured that there are appropriate safeguards in place, if we have your explicit consent to do so, or if it is necessary for the performance of a contract between you and us, or for the implementation of pre-contractual measures taken at your request.

Quantinum is a global company and your personal information may be transferred to, held, stored, or used across various locations worldwide as necessary for the uses stated above and in accordance with this Policy and in applicable law. This means that when we collect your personal information it may be processed in countries that may have data protection laws that are different to the laws of your country.

However, Quantinum will take reasonable steps to protect your privacy and to provide a level of protection of personal information that is comparable to that of your country of residence. With respect to international transfers of your personal data from locations within the UK or the European Economic Area (“EEA”) to jurisdictions that are not considered to provide an adequate level of data protection under EU law we may implement appropriate safeguards such as standard contractual clauses or other adequate safeguards approved by the European Commission to secure the transfer of your personal data.

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For further information on how the Company treats such transfers of data outside of the European Economic Area, please contact compliance@quantinum.com.

2.4 Sharing Personal Data within and outside of the United States

In order to review your candidacy and process your job application, we may share your personal data with organizations in the United States and in other jurisdictions outside the US. We will only do so if we have ensured that there are appropriate safeguards in place, or if we have your explicit consent to do so, if it is necessary for the performance of a contract between you and us, or for the implementation of pre-contractual measures taken at your request.

Additionally, Quantinum may share your personal information with any competent law enforcement body, regulator, government agency, court, or third-party where we believe the disclosure is necessary under applicable law or in the good-faith belief that such action is necessary to exercise, establish, or defend our legal rights or to protect your vital interests or those of any other person. We may also share your personal information with others with your consent or at your direction (e.g., a professional association).

3.0 Your Rights

Depending on applicable law in your jurisdiction, you may have certain rights with respect to your personal information.

- a) You may have the right to access, correct, update or request deletion of your personal information. Please inform us via email at compliance@quantinum.com of any changes to your personal information so that we can ensure that the personal information we store is accurate and up to date.
- b) You can object to the processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- c) You may have the right not to have a decision made about you that is based solely on automated processing, including profiling, if that decision produces legal effects about you or significantly affects you. Quantinum does not, as part of its recruitment process, make solely automated decisions about candidates.

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- d) Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent; and
- e) You have the right to complain to an applicable data protection authority about or collection and use of your personal information.

Some jurisdictions' privacy laws may give you the right to access, amend or erase your personal information or, in some circumstances, to restrict or object to the processing of your personal information.

If you would like to request a copy of your data or would like to take steps to exercise any of your rights, please contact us in writing as set out below. We may refuse to provide access and may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision as required by law.

If you would like to request a copy of your data or would like to take steps to exercise any of your rights, please contact us in writing as set out below. We may refuse to provide access and may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision as required by law.

Where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the rights to withdraw your consent for that specific processing at any time.

If you're unhappy with how we've handled or processed your personal information - or you want further information about your rights - you have the right to contact

- i) in the UK, the [Information Commissioner's Office](#), the supervisory body that regulates handling of personal information in the UK.
- ii) in the US, the local supervisory body that regulates handling of personal information in the local jurisdiction.

4.0 Security and Storage

We take reasonable steps to hold information securely in electronic or physical form and to prevent unauthorized access, use, modification or disclosure. We require our third-party data storage providers to comply with appropriate information security industry

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standards. All partners and staff and third-party providers with access to confidential information are subject to confidentiality obligations. The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services, hence, any transmission is at your own risk.

We will retain your personal information for as long as necessary in connection with the purposes described in this Candidate Privacy Policy and in accordance with Quantinuum's records management schedule, policy or applicable laws and, once the relevant retention timeframe has elapsed, only as required for the potential initiation or defense against legal and/or contractual actions and for the duration of the relevant statute of limitations of such actions under applicable laws.

5.0 Status of this Policy

We review this Candidate Privacy Policy regularly and reserve the right to revise it or any part of it from time to time to reflect changes in the law or technology practices. It is your responsibility to review the amended Candidate Privacy Policy.

We will facilitate your exercise of the rights that apply to you in accordance with applicable law. To exercise any of your rights relating to your personal information, or if you have any question or complaints about how your personal information is processed or wish to exercise your rights, please contact us via email at:

hr@quantinuum.com or to compliance@quantinuum.com.

If you have any question or complaints about how your personal information is processed or wish to exercise your rights, please contact: hr@quantinuum.com (only if you already are a Quantinuum employee) or our Data Protection Officer at compliance@quantinuum.com.

DEFINITIONS:

The terms can be found in the Glossary of Terms and Acronyms

RESPONSIBILITY FOR THE POLICY:

OWNERSHIP: The Company's Data Protection Officer shall serve as the policy "owner" and be responsible for future revision cycles.

POLICY CONTACT: Chief Legal Officer

REVISION HISTORY:

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Effective Date	Version	Description of Change	Section(s) Affected
29-NOV-2021	1.0	First draft of policy.	All
15-JUL-2023	2.0	Updating policy to ensure compliance across jurisdictions.	All

ANNEX – PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for the processing
<p>Personal contact details, such as your title, first name, last name, personal email, telephone number as well as contact details for your listed references.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> • open and maintain human resources records; • communicate with you in an emergency; • communicate with you and your references regarding your relationship with us; • prepare employment paperwork. 	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> • the performance of a contract and to take steps prior to entering into a contract; • our legitimate interests, namely managing our human resources.
<p>Recruitment information, such as CVs, references, recruitment assessments, any restrictive prior agreements, prior inventions, and interview notes including opinions and comments of interviewers and the recruitment team.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> • assess and maintain a record of suitability or eligibility for a role. 	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> • the performance of a contract and to take steps prior to entering into a contract; • our legitimate interests, namely managing our human resources and fulfilment of our professional obligations; and • compliance with a legal obligation to which we are subject.

*This **Candidate Data Privacy Policy** (“**Policy**”) is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of the Company or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.*

*This **Policy** is the property of the Company. It is the reader’s responsibility to review the intranet publication of this policy to ensure the most current version is being referenced before taking action based on this printed copy, which may be outdated.*

<p>Nationality, citizenship and right to work information, such as country of birth, place of birth, government identification numbers (such as National Insurance number).</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> • determine your eligibility to work; • fulfil our obligations to relevant government authorities (including tax authorities). 	<p>The processing is necessary for compliance with a legal obligation to which we are subject.</p>
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