

Privacy and Data Protection Notice to Job Applicants

Trading Point Holdings Ltd (the “Company”) **on behalf of itself and its Affiliated Entities**, is committed to protecting your privacy and making sure that any personal data it collects are processed in accordance with the EU General Data Protection Regulation (the “GDPR”) and applicable Cyprus laws and regulations.

For the purposes of this Agreement, “Affiliated Entity” means a company which, is from time to time, a subsidiary or a holding company or a subsidiary (other than the Company) of a holding company of the Disclosing Party.

This Privacy Notice describes how the Company may collect, use, store and /or otherwise process personal data of applicants for employment with the Company.

We may amend or update this Privacy Notice from time to time. All amendments or updates will be posted on the Company’s website at: <https://www.xm.com/careers> (the “Website”) and/or any other appropriate communication or document exchanged between us.

When we Collect Personal Data

Personal data may be collected by the Company on any of the following circumstances:

- when you apply for employment via the Company’s Website;
- when you contact us by email for the purpose of applying for employment;
- throughout the recruitment process, including during interviews or any other form of assessment.

If you choose to withhold any personal data requested by us on any of the above-mentioned circumstances, it may not be possible for us to process your application for employment which could lead to rejection of your said application.

In some circumstances, we may collect personal data about you from a third-party source. For example, where you have indicated certain persons as referees in your CV, we may contact them. In case we do, we shall inform you prior to any such communication. Also in the case that a hiring manager is considering making a job offer to a candidate, a basic background check will be performed. The hiring offer will only be valid if the interviewee successfully passes the background check. Additional background checks will be performed the first few weeks of the employment. In any case, such collection from third parties is always carried out in line with our legal obligations.

Types of Personal Data We Collect

We may collect the following personal data:

- **Personal Details**, such as your name, date of birth, contact details (postal address, email address, telephone number, fax), job title/profession and/or job description;
- **Identification Information**, such as ID number and/or passport number;
- **Recruitment Data**, such as academic qualifications, professional background, portfolio of work and any other information contained in your CV, your application form, record of interview or interview notes and/or any other assessment material.

Purpose and Legal Basis for the Processing of Personal Data

The Company uses your Personal Data for the purpose of processing your application for employment with the Company.

In the case of unsuccessful candidates and where you have provided your explicit consent, your personal data will be retained on our records in order to be considered for possible future employment opportunities with the Company.

The processing is carried out on the following legal bases:

- It is in the Company's legitimate interests. The processing enables us to manage the recruitment process, to assess and verify candidates' suitability for any particular position and to make a final decision on whom to hire;
- In case your application is successful, it is necessary in order for the Company to take steps at your request prior to entering into an employment contract with you;
- To respond to and defend against legal claims;
- In the case of unsuccessful candidates, on your explicit prior consent, for future employment opportunities that may be relevant to you.

Sharing Your Personal Data

We will not disclose your personally data, except:

- where we are required to do so by law or where it is necessary for the purpose of, or in connection with, legal proceedings or in order to exercise or defend legal rights;
- upon your instructions or your express consent.

We may also share your personal data with any third party to whom we assign or novate any of our rights or obligations.

Personal data about other individuals which you provide to us

If you provide us with personal data about another individual, for example personal data of referees in support of your application, you must ensure that you are entitled to disclose such personal data to us and that you have obtained their prior consent for such disclosure.

Retention of Personal Data

The Company will generally retain personal data for whole of the duration of the recruitment process and where an application has been unsuccessful the data will be deleted within 6 months from completion of the recruitment process.

If an application for employment with the Company is successful, personal data gathered during the recruitment process will be retained during the employment. The periods for which your data will be held and all other information regarding the processing of the same will be provided to you in our Privacy and Data Protection Notice to Employees.

Security and Confidentiality of your Personal Data

The Company strives to maintain appropriate technical and organisation security measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Your Rights

You may find below a list of your legal rights insofar as your personal data are concerned. Please note that some of these rights may not be applicable to your situation.

- You have the right to gain access to the personal data that we hold about you.
- You have the right of rectification, that is, to request the correction, without undue delay, of any personal data that we hold about you and are either inaccurate or incomplete.
- You have the right to obtain the erasure of your personal data, without undue delay, provided, amongst others, the personal data in question are no longer necessary in relation to the purposes for which they were collected.
- You have the right to restrict our processing activities or to object to the processing of your personal data.
- You have the right to data portability, that is, to request from us that we send your personal data in a structured, commonly used and machine-readable format, and to transmit those data to another controller.
- If we rely on your consent as our legal basis for the processing of your personal data, you have the right to withdraw that consent at any time.

If you wish to exercise any of your above-mentioned rights or have any questions or comments with regard to this Privacy Notice, you may contact our Data Protection Officer either by email at dpo@xm.com.

In addition to the above, you also have the right to lodge a complaint to the Office of the Commissioner for Personal Data Protection in Cyprus, at the following postal and email address:

1 Iasonos str., 1082 Nicosia
P.O.Box 23378, 1682 Nicosia
Tel: +357 22818456
Fax: +357 22304565
Email: commissioner@dataprotection.gov.cy