CANDIDATE PRIVACY NOTICE

We are committed to protecting and respecting your privacy. This notice is intended to provide you with information about the purposes for which, and the manner in which, we process and protect the personal data that you provide to us or that we obtain in connection with your application for a specific job opening or your submission of a general employment application. It also informs you of your rights in connection with our processing of your personal data.

1. Who is the controller of your personal data?

We are WHC Croatia d.o.o., Ulica Pere Budmanija 1, Zagreb, Croatia, Personal Identification Number (OIB): 41252860015 (hereinafter: "we," "us," or "WHC"), a temporary staffing and employment placement agency headquartered in Zagreb and part of the HEADS ADRIATIC group.

We are the controller, as defined in Regulation (EU) 2016/679, the General Data Protection Regulation (hereinafter: the "GDPR"). More specifically, we process your personal data as described in this notice. If you have any questions or requests regarding the processing of your personal data, you may contact us by email at office@whc-croatia.com.

Pursuant to the applicable decisions, the company is registered in the Register of Temporary Employment Agencies maintained by the Ministry of Labor and Pension System under No. 59/18, CLASS: 102-02/18-03/34, REF. NO.: 524-04-01-01/3-18-2, and No. 219/18, CLASS: 102-02/18-04/43, REF. NO.: 524-04-01-01/3-18-2. The Ministry has also issued us a license/certificate authorizing us to provide employment placement services.

As part of our business operations, we provide a range of services, including employment placement, temporary staffing, candidate sourcing and selection, testing and assessments, career development, training and education, outplacement services, international workforce mobility services, market research, marketing and promotional services, administrative services, public opinion research, and other registered business activities.

2. Personal data we process

The specific purpose, legal basis, and manner in which we process your personal data depend on the service we provide and the nature of the relationship through which we collect your data. For example, if you apply for a position with one of our clients for whom we provide employment placement services, we will process your data to

conduct the client's selection process for the purpose of employing a candidate, and we will share your data with that client.

If you apply for a position with us as the employer in our capacity as a temporary staffing agency that assigns employees to our clients as host companies, we process your data in order to conduct the selection process, enter into an employment agreement with you, and assign you to a client.

The personal data we process includes:

Category	Personal data
Identification data and information about qualifications and experience	First and last name; information about your work experience, education, and qualifications; foreign language proficiency and other skills; work authorization information; references; salary expectations; and any other information included in your application or résumé, or otherwise provided by you during the selection process, including interviews.
Contact information	Address, city of residence, email address, and telephone number.
Information about how you contacted us	If you apply for a specific position through Facebook or LinkedIn using your social media profile or account, we also process information from your profile, including information you have provided there and, for example, your profile photo. If you apply through Jobble, MojPosao.hr, posao.hr, or by another method, we record how your application was submitted.
Information about your communications with us	If you contact us, we retain a record of your communications with us, including your request or inquiry, as well as any feedback regarding our services that we may ask you to provide after the recruitment process has concluded.
Technical data	If you use our website to apply for a specific position or to submit your information to our database, we also record technical information about your visits to our website, such as your IP address, browser information, language settings,

	timestamps, location data if you enable that option, and other technical information.

The exact scope of the data we process depends on the information you provide in your application or résumé. Providing a candidate's personal data is not a statutory or contractual requirement; however, if you do not provide it, we will be unable to consider your application. We always obtain personal data directly from you, except when we use publicly available sources, including publicly available information on LinkedIn profiles, as described in Section 3.2 below.

If we process personal data for any other purposes, we will notify you separately. We do not engage in automated decision-making with respect to candidates' personal data within the meaning of Article 22 of the GDPR.

3. Purposes and legal bases for processing personal data

With respect to the purposes and legal bases for processing, we distinguish among the following situations:

3.1 Processing data you submit when applying for a job opening

The purpose and legal basis for processing your identification data and information about your qualifications and experience under the GDPR is to take steps at your request prior to entering into a contract, in accordance with Article 6(1)(b) of the GDPR, whether the prospective contract is with us or with our client. More specifically, we take steps at your request for the purpose of entering into an employment agreement.

After the selection process has concluded, if you are not hired but we wish to retain your résumé and other information for potential future job openings, we will notify you and request your consent in accordance with Article 6(1)(a) of the GDPR. If you do not provide your consent, we will not retain your data for that purpose.

3.2 Processing data when we contact you regarding a specific job opening or inclusion in our candidate database

When a client engages us to conduct a selection process and identify candidates whose profiles match the client's requirements for potential employment by the client—commonly referred to as headhunting—we may obtain your personal data by reviewing publicly available sources. These sources may include publicly available profiles on LinkedIn or open job seeker profiles on platforms such as posao.hr or MojPosao. The

categories of personal data we collect in such cases include your first and last name, profile photo if publicly available, work experience, education, qualifications, skills, and contact information if publicly available.

We process this data on the basis of our legitimate interests and those of our clients in identifying candidates for a specific position. More specifically, our legitimate interests consist of carrying out our business activities, identifying candidates with particular profiles and skills, and conducting selection processes, in accordance with Article 6(1)(f) of the GDPR.

In such cases, we will inform you that we are processing your personal data and that your profile matches the requirements no later than when we first contact you and, in any event, within one month of collecting your data. With your consent, in accordance with Article 6(1)(a) of the GDPR, we will then add your data to our candidate database for the selection process.

3.3 Processing data based on your consent to inclusion in our candidate database

If, independently of applying for a specific job opening, you consent to our adding your personal data to our candidate database—for example, by using the form and consent option on our website—we will process your identification data, information about your qualifications and experience, and contact information in order to contact you about future job openings that match your profile, in accordance with Article 6(1)(a) of the GDPR.

We retain your data in the candidate database for no longer than 24 months from the date you provide your consent, unless you withdraw your consent earlier. You may withdraw your consent at any time, without affecting the lawfulness of any processing based on your consent before its withdrawal, by submitting a request to office@whc-croatia.com. If you withdraw your consent, your data will be deleted from our candidate database without undue delay.

3.4 Processing for our marketing activities and service improvement

We will also use your data to request feedback, assess your satisfaction with our services and communications, and improve our services and processes, based on our legitimate interests under Article 6(1)(f) of the GDPR. If you do not wish to be contacted for these purposes, you may object to such processing at any time.

3.5 Processing data collected through the contact form on our website

If you contact us using the “Contact Us” form on our website, we collect your first and last name, company name, email address, telephone number, the service in which you

are interested, and the content of your message. We process this data in order to respond to your inquiry and communicate with you as a prospective client, business partner, or other interested party. The legal basis for this processing is our legitimate interest in responding to inquiries received and developing business relationships, in accordance with Article 6(1)(f) of the GDPR.

We retain data collected through the contact form for as long as necessary to address your inquiry and conduct any related follow-up communications, but for no longer than 12 months from the date the inquiry is received. If subsequent communications result in the establishment of a business relationship, your data will continue to be processed in accordance with the terms of that business relationship and applicable laws and regulations, of which you will be notified separately.

3.6 Processing for compliance with legal obligations

We may disclose your data to competent authorities when necessary to comply with our legal obligations, in accordance with Article 6(1)(c) of the GDPR. Such processing may be required under applicable laws and regulations, including those relating to employment, taxation, criminal law, anti-money laundering, and other areas, as well as in connection with proceedings and decisions of competent authorities. Such authorities may include regulatory and inspection bodies, courts, financial or tax authorities, and other competent authorities.

3.7 Processing of technical data for website operation

We process the technical data referred to in Section 2 for technical reasons necessary to display our website and to ensure its stability and security. The legal basis for this processing is our legitimate interest, in accordance with Article 6(1)(f) of the GDPR, to provide you with the website and its functionalities. Log files generated in connection with the use of our website are retained for no longer than 30 days, after which they are deleted. For information about cookies, please see: https://whc-croatia.com/cookie-policy.

4. Who has access to your personal data and with whom we share it

Our authorized personnel will access personal data only to the extent necessary to perform their duties and fulfill the purposes described above, including conducting the selection and hiring process. Our employees are required to maintain the confidentiality of all personal data they are authorized to access.

Our business partners may also have access to your data. These primarily include IT service providers that maintain our information systems, software, and networks. We

have entered into appropriate agreements with these providers requiring them to implement adequate safeguards.

For the purposes described above, we will also share your data with our affiliated company, **HEADS TALENT d.o.o.**, Ulica Pere Budmanija 1, Zagreb, Croatia, in order to centralize certain processing and selection activities. In this context, we act as joint controllers. To exercise any of your rights or obtain additional information about this processing, including the essence of the arrangement between the joint controllers, you may contact us at office@whc-croatia.com.

If you applied for an advertised job opening for which we conducted a campaign through Facebook, Meta Platforms Ireland Limited, the provider of Facebook, acts as a processor and has access to your data in that context. Additional information is available at Facebook Data Processing Terms.

If we accessed your profile through the MojPosao profile database based on the consent you provided, as described in the MojPosao Privacy Policy, Alma Career Croatia d.o.o. also has access to your data in its capacity as an independent controller.

If we accessed your profile through the Posao.hr profile database based on the consent you provided, as described in the Posao.hr Privacy Policy, Oglasnik d.o.o. also has access to your data in its capacity as an independent controller.

5. Transfers of personal data outside the European Union

We process and store your data exclusively within the European Economic Area (EEA). If it becomes necessary to transfer your personal data outside the EEA, it will be provided to recipients in third countries only if appropriate safeguards are in place to ensure an adequate level of protection for personal data transferred in this manner.

For email communications, we use a processor located outside the European Union, Mailgun Technologies (Sinch Email). We have entered into Standard Contractual Clauses and a data processing agreement with this provider to ensure an adequate level of protection for personal data. Additional information is available on the Mailgun GDPR page and in the Sinch Data Processing Agreement.

6. How long we retain your personal data

We retain your personal data for as long as necessary to fulfill the purpose for which it was collected, as follows:

- If your data is processed in connection with an application for a specific position, we will delete it 90 days after the selection process has concluded, unless you

have consented to having your data included in our candidate database so that we may contact you about other job openings.

- If your data is processed based on your consent, we retain it for 24 months or for a shorter period if you withdraw your consent.
- If you are hired as a result of our services, such as employment placement or temporary staffing, we will retain your data for as long as required under applicable laws and regulations so that we can demonstrate compliance, including throughout any applicable statutes of limitations.

7. Technical and organizational measures

We implement appropriate technical, physical, and organizational security measures to protect personal data against misuse or accidental, unlawful, or unauthorized destruction, loss, or alteration. These measures include access restrictions and controls, confidentiality obligations, and secure server infrastructure, including encryption of data at rest and in transit within our databases.

8. Your rights in connection with our processing of personal data

You have the following rights in connection with our processing of your personal data:

1. **Right of access:** the right to access your personal data, including the right to obtain a copy of the personal data being processed.
2. **Right to rectification:** the right to have inaccurate personal data concerning you corrected or completed without undue delay, including by providing a supplementary statement.
3. **Right to erasure:** the right to have personal data concerning you deleted, particularly when:
    - the data is no longer necessary for the purposes for which it was collected or otherwise processed;
    - the data has been processed unlawfully or must be deleted to comply with a legal obligation under applicable laws and regulations; or
    - you withdraw, in whole or in part, the consent you provided for the processing of your personal data for the stated purposes, and there is no other legal basis for the processing.
4. **Right to restriction of processing:** the right to restrict processing in the following circumstances:

- if you dispute the accuracy of your personal data, for the period necessary for us to verify its accuracy;
- if the processing is unlawful but you object to the deletion of your personal data and request that its use be restricted instead; or
- if we no longer need the personal data for processing purposes, but you require it for the establishment, exercise, or defense of legal claims.

5. **Right to object:** the right to object at any time to the processing of your personal data based on our legitimate interests.
6. **Right to withdraw consent:** the right to withdraw your consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
7. **Right to lodge a complaint:** the right to lodge a complaint regarding the processing of your personal data with the competent supervisory authority, the Croatian Personal Data Protection Agency, Ulica Metela Ožegovića 16, Zagreb, Croatia (www.azop.hr).

If you wish to exercise any of the rights listed above, you may submit an inquiry or request to office@whc-croatia.com.