

# **Privacy Notice for Recruitment**

Exploration School ("EXPLO") is committed to protecting and respecting your privacy. Our Privacy Notice for Recruitment outlines how the personal data collected from you, or that you provide to us, will be processed by us in connection with our recruitment processes. Please read the following, as well as our <u>Privacy Policy</u>, carefully to understand our practices regarding your personal data.

# Applicants in the European Economic Area (EEA)

EXPLO is based in the United States and has a designated Data Privacy Officer who can be contacted at <u>privacy@explo.org</u>. Exploration School uses Workable, an online application system provided by Workable Software Limited, to assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions. Where you apply for a job opening via Workable, on a job site, or through a similar online service provider, you should note that the relevant provider may retain your personal data and may also collect data from us in respect of the progress of your application. Any use by the provider of your data will be in accordance with the provider's Privacy Notice.

## **Information We Collect From You**

We may collect and process the following types of information from you:

- Information that you provide when you apply for a position. This includes data provided through an online job site, via email, in person at interviews, via video, and/or by any other method.
- We process personal data such as name, email address, address, telephone number, qualifications, experience, employment history, and skills experience that you provide to us.
- We may keep a record of correspondence between you and EXPLO staff.
- A record of your progress through any hiring process that we may conduct.
- Details of your visits to Workable's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access.

# **Information We Collect From Other Sources**

Workable provides us with the ability to link the data you provide to us with other publicly available information about you that you have published on the Internet, including social media platforms. Workable's technology allows us to search various databases to find possible candidates to fill our job openings. Where we find you in this way, we will obtain your personal data from these sources. We may receive your personal data from a third-party who recommends you as a candidate for a specific job opening or for our business more generally.

# Lawful Basis For Processing

We rely on legitimate interest as the lawful basis on which we collect and use your personal data. Our legitimate interests are the recruitment of staff for our business. Where you apply for a job opening through the Indeed Apply functionality, we rely on your consent, which is freely given by you during the application process, to disclose your personal data to Indeed on the basis described below.

## **Purposes Of Processing**

We use information held about you in the following ways:

- To consider your application in regard to a job for which you have applied.
- To consider your application in regard to other job openings at EXPLO.
- To communicate with you in regard to the recruitment process.
- To enhance information we receive from you with data obtained from third-party data providers.
- To find appropriate candidates to fill our job openings.
- To help our service providers (such as Workable and its processors and data providers) and partners (such as the job sites through which you may have applied) improve their services.

#### **Automated Selection**

We may use Workable's technology to source appropriate candidates for us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of identifying potential candidates is automatic, however, any decision as to who we will engage to fill the job opening will be made by our staff.

#### **Disclosure Of Your Information**

As set out above, we pass your information to our third-party service providers, including Workable, who use it only in accordance with our instructions and as otherwise required by law.

Where you have applied for a job opening through the Indeed Apply functionality, and where you have consented to this disclosure, we will disclose to Indeed certain personal data that we hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that we hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website. Where you have applied to a job opening through another service provider, we may disclose data similar to the Disposition Data to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by us.

# Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, used, or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

# Where We Store Your Personal Data

We secure the personal information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All personal information is protected using appropriate physical, technical and organizational measures.

The data we collect from you and process using Workable's Services may be transferred to and stored at a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to Workable's staff in the USA or it may be stored by Workable's hosting service provider on servers in the USA and in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA. A Data Processor Agreement has been signed between Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of misuse of your personal data.

# How Long We Keep Your Personal Data

Exploration School will store data that you provide us as long as we consider it potentially useful in contacting you about EXPLO job openings or as needed to comply with legal obligations, resolve disputes, and enforce our agreements; then we securely delete your information. Your information can also be deleted by you or your designee or by EXPLO upon receipt of a written request to do so.

# **Your Rights**

For the purpose of the General Data Protection Regulation ("GDPR") the Data Controller is Exploration School. Under the <u>General Data Protection Regulation</u>, you have the right to:

- Access your personal data.
- Require EXPLO to correct any mistakes in your information which we hold.
- Require the erasure of personal data concerning you in certain situations.
- Receive the personal data concerning you which you have provided to us, in a structured, commonly used and readable format and transmit that data to a third party in certain situations.
- Object at any time to processing of personal data concerning you for direct marketing.
- Object to decisions being taken by automated means which significantly affect you.
- Object in certain other situations to our continued processing of your personal data.
- Otherwise restrict our processing of your personal data in certain circumstances.
- Claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.</u>

If you would like to exercise any of these rights, please contact <u>privacy@explo.org</u> and supply sufficient data regarding your identity and address and the information to which your request relates.

# How To File A Complaint

We hope that any query or concern raised about our use of your information can be resolved by contacting <u>privacy@explo.org</u>.

The <u>General Data Protection Regulation</u> also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union or European Economic Area where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <u>http://ico.org.uk/concerns/</u> or telephone: <u>+44303-123-1113</u>.

# Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to <u>privacy@explo.org</u> or sent to the address below.

EXPLO The Exploration Center 932 Washington Street Norwood, MA 02062 USA