

**LaterPay GmbH** (“we”, “us”, “our”) are committed to protecting and respecting your privacy. This Privacy Notice sets out the basis on which 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 carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controller is **LaterPay GmbH**. Our address can be found below. The processing of application data may also be governed by national law, e.g. § 26 BDSG in Germany.

Where you apply for a job opening posted by us, these Privacy Notice provisions will apply to our processing of your personal information in addition to our other Privacy Notice which is available on our Website. As used in this Privacy Notice, “personal data” means information that identifies job applicants, either submitted as part of the online application and/or through alternative channels (e.g., via professional recruiting firms).

By submitting your personal data to us, you acknowledge that:

- You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- Your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice. If you apply for a sales, customer support or marketing position at LaterPay GmbH, your application data will be shared with LaterPay Inc. This is required as our sales, customer support and marketing teams work closely together with LaterPay Inc.
- You are not required to provide any requested information to us, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by LaterPay.

## Your Personal Information

### How and why we process personal data:

- We use Personio, an online application provided by Personio GmbH, to assist with our recruitment process and, for successful candidates, for employment purposes. We use Personio to process personal information as a data processor on our behalf. Personio is only entitled to process your personal data in accordance with our instructions pursuant to Art. 28 GDPR.

- We process personal data that you provided to us with your application, as well as personal data we obtain about you in the course of the application process (for example, during interviews or via job assessments). Other data types may be obtained from third parties, including for example, recruitment agencies.

### What information we collect and process:

We collect and process some or all of the following types of information from you if provided to us:

- Information that you provide by filling in the Personio application form and any documents (like your CV or cover letter) you attach to the application, including:
  - (i) Identification data, including first name and surname
  - (ii) Contact information, including email address, phone/mobile number, home address
  - (iii) Data regarding responses to screening questions (where applicable)
  - (iv) Previous employment information, including date of hire, job title, department and business unit, work locations, work status (full time, part time), data pertaining to work preferences and abilities
  - (v) Resume, including education, past work experience and references,
- We keep a record of the email correspondence we have with you and may process some of the information you provide within the email correspondence.
- We may also keep a record of job interview notes and assessment results, uploaded by the hiring team for the position you applied for.

Only authorized HR staff and/or staff involved in the application process have access to your data.

Processing of this personal data is required to enable LaterPay to administer the recruiting process, including the set-up of an electronic job applicant HR file, managing your application, organizing interviews - in short, the processing is necessary for us to enter into a contract with you pursuant to Article 26 BDSG in Germany.

In case of legal proceedings, we will need to process your personal data to establish, exercise or defend us against the legal claim.

### Do we share your personal data with others?

Personal data will only be shared with other LaterPay affiliates (LaterPay Inc.) in certain circumstances and where lawful to do so. If you apply for a sales, customer support or marketing position at LaterPay GmbH, your application data will be shared with LaterPay Inc. This is required as our sales, customer support and marketing teams work closely together with LaterPay Inc.

Whenever we need to share your personal data, we will only do so on a need to know basis and with selected employees for tasks within their job responsibilities.

#### **Do we transfer personal data to countries outside of the EEA?**

We also transfer the personal data we process to countries outside the European Economic Area ("EEA"), for example, when one of our service providers use staff or equipment based outside the EEA. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights.

#### **How long do we store your personal data?**

If your application for employment is successful and you commence employment with LaterPay, your personal data will be transferred to your personnel file and will be processed for employment purposes.

If your application for employment is not successful, we will keep your personal data for a period of maximum 6 months for the purposes of the establishment, exercise or defense of legal claims.

#### **What are your rights under applicable data protection laws?**

You have the right to request access to, correction, or deletion of your personal data, to ask for data portability, as well as - depending on the laws of your country - to define instruction on your personal data after your death. You are also entitled to object to the processing of your personal data in certain

instances. If we process your personal data based on your consent, you may withdraw it for the future at any time. To make a data subject request or for general questions and queries, please contact us on [candidate-privacy@laterpay.net](mailto:candidate-privacy@laterpay.net) or exercise your right to erasure via a link in your application confirmation email from Personio.

#### **Questions**

If you have any concern or question about privacy or want to contact one of our data controllers, please contact us with a thorough description and we will try to resolve the issue for you. You can lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

#### **LaterPay GmbH**

Oskar-Von-Miller-Ring 20, 80333 Munich, Germany

#### **LaterPay Inc.**

205 E 42nd St, New York, Floor 20, NY 10017, USA

#### **Changes to this Notice**

We may decide to change this Notice. If the change is fundamental or may significantly affect, we will provide you with the updated Notice in advance of the change actually taking effect. We encourage you to review the content of this Notice regularly.

V1.1, July 2018