

## **U.S. Job Applicant Privacy Notice**

Last Updated: November 21, 2019

This Privacy Notice explains how OptiMargin (collectively, "OptiMargin," "we," "our," or "us") collects, uses, discloses, and otherwise processes personal information about our U.S.-based recruits and job applicants.

This Privacy Notice is not a contract and does not create any legal rights or obligations. This Privacy Notice also is not intended to replace other notices or disclosures we may provide to you in connection with your application for a job or eventual role in our organization, which will supersede any conflicting disclosures contained in this Privacy Notice.

What is Personal Information?

When we use the term "personal information" in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you within the context of you acting as a job applicant. It does not include aggregated or deidentified information that is maintained in a form that is not capable of being associated with or reasonably linked to you.

Our Collection of Personal Information

During the recruiting process and when you apply for a job with us, we collect personal information about you, which may include:

- Contact Information: such as your full name, email address, home address and telephone number.
- Professional History & Qualifications: such as your previous employers, positions and work experience, professional licenses, certificates or other qualifications, and employment references or referrals.
- Educational History & Qualifications: such as your highest level of education, the schools you attended and when you were in attendance, degrees, certificates or other educational qualifications you earned, and your transcripts or educational references.
- Background Check Information: when permitted by applicable law, we may choose to conduct a background check in connection with your application such as to verify professional and educational history and qualifications or identify criminal history that may be relevant for a position with us. The results of the background check may include personal information we do not already have about you.

- Equal Opportunity Information: such as age, race, ethnicity, national origin, citizenship, sex, gender identity, sexual orientation, religion, disability or accommodation request, or marital or veteran status when you choose to provide it, but it will not be used in the hiring decision unless specifically permitted by law.
- Web-Related Information: such as technical details about your visit to our online services contained in log files or analytics data relating to your usage and activity on our online services. For more information, please refer to the general Privacy Notice on our website.
- Other Application and Interview Information: any personal information you choose to share with us in your interview or application, CV, resume, transcripts or other supporting documentation.
- Financial Information: such as your previous or desired salary, bonus, benefits, expenses, and stock or equity grants.

Although we often collect the personal information described above directly from you, we may also collect certain information from references, recruiters, job-related social media sites (such as LinkedIn), and publicly available sources. In addition, we may also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, scheduling providers and application providers.

#### Our Use of Personal Information

We use the personal information we collect during the recruiting process and when you apply for a job with us to:

- Identify you as a potential candidate and review your application for a position with us;
  - Verify the information provided to us in connection with your application or received from other sources;
  - Determine your eligibility and suitability for the potential position or other opportunities with us;
  - Facilitate the recruiting and interview process;
  - Communicate with you about the status of your application or other opportunities with us that may be of interest to you;
  - Assess and improve the performance and success of our recruiting and hiring process;
  - Conduct internal investigations, audits, compliance, risk management, problem resolution and security operations;
  - Fulfill contractual obligations to you and other third parties;
  - Comply with applicable law, rule, regulation, legal proceeding and government investigations, including relating to tax reporting and immigration.
- Please note that if you accept an offer from us, we may transfer the personal information we collected about you during the recruiting and job application process to your personnel file with us.