

Data Protection Policy of ICAP PEOPLE SOLUTIONS Single Member S.A - Human Capital Advisors

2, Eleftheriou Venizelou Avenue, Kallithea, Athens, Greece

with VAT number 800991837 (Reg. No. 146482401000)

Last Amended on 06.16.2022

1. Field of Scope

This privacy notice lays out the way **ICAP PEOPLE SOLUTIONS Single Member S.A - Human Capital Advisors** (hereinafter referred to as “**ICAP PEOPLE SOLUTIONS**”), member of ICAP Outsourcing Solutions Group, collects, uses, processes, stores, manages, and protects the cv data, data related to skills, abilities and psychometric attributes of individuals, as well as development and behavior data of individuals (hereinafter referred to as “**Personal Data**”), so as to meet the data protection standards of the company and comply with the applicable data protection law.

This privacy policy shall apply to all information (i) that relates to the HR products and services (hereinafter referred to as “**Services**”) provided by ICAP PEOPLE SOLUTIONS (including but not limited to the provision of training, recruitment, executive search and selection solutions and human capital consulting services) (ii) pertaining to profiling data of individuals collected through third party talent assessment, valuation platforms, psychometric tools and executive search firms iii) pertaining to Client data obtained through the use of the Services. ICAP PEOPLE SOLUTIONS is bound to protect the privacy of Clients, individuals and other data subjects and adhere to the Data Protection legislation currently in effect.

This policy shall not apply to information collected through any other website, services, products, platforms or for practices of companies that we do not control. We are not responsible for any personal data protection practices pertaining to websites, services, products, platforms of other companies.

2. Categories & Types of Collected Data

Data Collected:

A. CV Data: Name/Surname, postal address, contact details (including e-mail address, mobile phone no.), academic qualifications, working experience, hobbies, interests, references

B. Personality Profiling Data: first name, last name, tax registration number, date of birth, skills, abilities and psychometric attributes (profiling)

C. Behavioral Profiling Data: name / surname linked with training results, individual's development and behavior skills and capacity (profiling)

Declaration Regarding The Processing of Personal Data By ICAP PEOPLE SOLUTIONS (by its capacity as Data Controller and Processor - in accordance with the General Data Protection Regulation EU 679/2016)

Why will you process my Personal Data (PD)?

ICAP PEOPLE SOLUTIONS provides training, recruitment, executive search and selection solutions and human capital consulting services containing CV, personality and behavioral data of individuals on the basis of the intended purpose, such as described in paragraph 6 hereof. Their contents vary depending on the type and purpose of the provided service of ICAP PEOPLE SOLUTIONS. The lawful basis of the data processing, is ICAP PEOPLE SOLUTIONS's legitimate interest and in some instances the consent of the data subjects.

In addition ICAP PEOPLE SOLUTIONS may collect personal data of candidate employees with their consent for the purpose of providing employment opportunities and related employee training solutions.

Furthermore ICAP PEOPLE SOLUTIONS collects CV data, psychometric, employee ability and personality assessment tests through third party sources (talent assessment and valuation platforms, psychometric tools and executive search firms or other) on the basis of its legitimate interest. More specifically:

(i) ICAP PEOPLE SOLUTIONS utilizes www.icapcareer.com, an online talent network platform from which we receive and manage professional and cv data of individuals.

For more information about www.icapcareer.com, please read their Privacy Notice at <https://icap.jobs.net/en-GB/privacy-policy> that represents the third party platform (careerbuilder) privacy terms.

(ii) ICAP PEOPLE SOLUTIONS utilizes the online individual/corporate assessment platform Aon Assessments (<https://assessment.aon.com/en-us/>) from which we receive and manage individual or corporate employees' ability tests & assessments.

For more information about Aon Assessments please read their Privacy Notice at <https://assessment.aon.com/en-us/sites/privacy-statement/>

(iii) When acting as data processor on behalf of Corporate Clients written instructions, ICAP PEOPLE SOLUTIONS utilizes the online personality assessment platform Hogan (<https://www.hoganassessments.com/about/>) from which it receives profiling data related to individual skills, abilities and psychometric attributes.

For more information about Hogan please read their Privacy Notice at <https://www.hoganassessments.com/privacy-policy/>

(iv) ICAP PEOPLE SOLUTIONS utilizes the online training platform “MyHuthwaite” (<https://myhuthwaite.com>) for providing e-learning solutions.

For more information about Huthwaite International please read their Privacy Notice at <https://huthwaiteinternational.com/privacy-policy/>

(v) When acting as data processor on behalf of Corporate Clients written instructions, ICAP PEOPLE SOLUTIONS utilizes the online 360’ assessment platform Peter Berry Consultancy <https://www.peterberry.com.au/> from which it receives 360’ feedback information, regarding leadership skills and professional behaviors

For more information about PBC please read their Privacy Notice at <https://www.peterberry.com.au/privacypolicy/>

Information automatically collected when visiting and interacting in the websites: With regards to the data collected through the website <https://icappeoplesolutions.com/> may review the pertinent privacy notice here [<https://icappeoplesolutions.com/en/uploads/ps-privacy-en24052022.pdf>].

3. Data Collection Points

- Third party recruitment platforms (ICAP Career) - **A**
- Third party personality assessment platforms (AON Assessments, Hogan, Peter Berry 360) – **B**
- Third party e-learning platforms (Huthwaite) - **A**
- Third party IPCD records (Royalties platform) (Huthwaite) - **A**
- Third party Behavioral Data platform (Huthwaite) – **C**
- Individuals (via online forms, e-mails) - **A, C**
- Corporate Clients - **C**

4. Transfer of Data to Third Parties

ICAP PEOPLE SOLUTIONS does not share or discloses any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. ICAP PEOPLE SOLUTIONS reserves the right to disclose your personal data to any member of its affiliate/subsidiary companies (parent company and its subsidiaries) or other third parties to the extent it is reasonably necessary for the purposes determined in this notice and in particular:

- Certain data (CVs and professional data, ability and personality tests and assessments) will be transferred to corporate customers with which, we have entered into contractual agreements for the purpose of fulfilling our company's legitimate interest (provision of HR services) in a correct and within our contractual terms framework
- Profiling data related to the development and behavior skills of individuals may be transmitted directly to individuals who request the provision of self training service or to corporate customers requesting pertinent training programs for their employees
- Profiling data related to skills, abilities and psychometric attributes, may be disclosed to individuals or to corporate customers with which we have entered into contractual agreements
- Your data may be disclosed to cloud hosting providers for the purpose of storing and safeguarding the data by applying the appropriate technical and security measures
- Your data may be transmitted, become accessible and processed by subsidiaries of our group within the European union, which apply the appropriate technical, physical and administrative security measures for the protection of the data from loss, misuse, damage, alteration, unauthorised access and disclosure, as provided by article 32 of the GDPR 679/2016
- Some third parties assisting us in the provision of services and/ or the fulfillment of purposes based on our legitimate interest (see art. 2 hereabove) may be located outside the European Economic Area. In such case, we take all necessary steps to ensure the protection of your data and provide for appropriate safeguards, when necessary, such as by using standard contractual clauses adopted by the European Commission. Certain data (CVs and professional data) are transferred and stored to third party platform databases that we utilize, such as CareerBuilder. For more information about CareerBuilder LLC, please read their Privacy Notice at: <http://www.careerbuilder.com/ie/jobseeker/info/privacy.aspx>
- During all data transfers, we always take all appropriate measures so as to ensure that the transmitted data are the minimum required for the intended processing purpose and that the

conditions for legitimate and lawful processing will always be met. In addition all data processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice.

- ICAP PEOPLE SOLUTION'S servers are hosted at the data centre of the company Kyndryl Hellas S.M.S.A (hosting provider) located in Athens. You may find more information on Kyndryl Hellas S.M.S.A's privacy notice in the following link: <https://www.kyndryl.com/us/en/privacy>

5. Personal Data Retention Period

ICAP PEOPLE SOLUTIONS only ever retains personal data for as long as is necessary and we have strict review and retention policies in place to meet these obligations. The data retention period depends on the lawful basis of processing, as set out in detail below:

- In case the lawful basis for processing is the exercise of legitimate interest, the processing of personal data is carried out for as long as it is considered necessary for the achievement of the intended statutory purpose of ICAP PEOPLE SOLUTIONS described in paragraph 6 below, and until such time the limitation period of any related claims has expired.
- In case the personal data of the individual employees have been provided with their own consent and within the framework of our services, we shall retain those data until the granted consent by the data subject has been withdrawn. In case the consent is withdrawn for any valid reason, we shall retain them for as long as it is required until the limitation period of any related claims expires.
- In case the lawful basis for processing is the performance of the contract, we shall retain your data for as long as you retain the contractual relationship with ICAP PEOPLE SOLUTIONS in hard copy and in electronic form or we shall retain them for as long as it is required until the limitation period of any related claims expires.

6. Legitimate Interest - Intended Purpose - Lawful Basis for Data Processing

Data processing is necessary for the purposes of the legitimate interests pursued by the ICAP PEOPLE SOLUTIONS . ICAP PEOPLE SOLUTION'S statutory purpose is the provision of training, recruitment, executive search, selection solutions and human capital consulting services.

Within this framework, ICAP PEOPLE SOLUTIONS collects, manages and provides CV data, data related to skills, abilities and psychometric attributes of individuals, as well as development and behavior data of individuals for the performance of the contracts with corporate or individual clients. ICAP PEOPLE SOLUTIONS processes and stores said data within the E.U.

7. Rights of the Data Subjects

You may exercise, as the case may be, the rights deriving from the applicable Greek Legislation and the General Data Protection Regulation (Regulation (EU) 2016/679) which are as follows: (a. the right of information (article 13), b. the right of access (article 15), c. the right to rectification (article 16), d. the right to erasure “right to be forgotten” (article 17), e. the right to restriction of processing (article 18), f. the right to data portability (to receive your personal data in a structured and commonly used format - article 20 where applicable) and g. the right to object (article 21) which applies to certain data processing activities

These rights shall be exercised free of charge for you by sending a relevant letter to the Data Protection Officer (DPO) of ICAP People Solutions: 2, Eleftheriou Venizelou, Kallithea or via e-mail to privacy@icap-ps.com. In case however, the aforementioned rights are exercised excessively and without good cause thus causing us administrative burden, we may charge you with the cost related to the exercise of the respective right.

In case you exercise any of your rights, we will take all appropriate measures available for the satisfaction of your request within thirty (30) days following the receipt of the relevant request. We may either inform you on the acceptance of your request or on any objective grounds that hinder the processing of your request.

Notwithstanding the above, you may at any time object to the processing of your Personal Data, by withdrawing your consent (article 7, par. 3 of the GDPR 679/2016) by sending a letter to the Data Protection Officer (DPO) of ICAP PEOPLE SOLUTIONS: 2, Eleftheriou Venizelou, Kallithea, or via e-mail to info@comply.gr, This right applies only in cases where the lawful basis for the data processing is the consent of the Data Subject.

8. Data Processing by ICAP PEOPLE SOLUTIONS

In some instances, our corporate customers provide their employees' data (profiling data related to development and behavior skills) for the purpose of providing to them customized training programs for their employees. In such cases, ICAP PEOPLE SOLUTIONS shall operate as the “Data Processor” of the personal data, which are included in the said training program data. Consequently, in those cases different provisions of the GDPR 679/2016 shall apply, with which we comply.

Additionally, ICAP PEOPLE SOLUTIONS applies throughout the data processing procedure, the appropriate technical, physical, and administrative security measures for the protection and security of the personal data from loss, misuse, damage or modification, unauthorised access and disclosure, in compliance with article 32 of the GDPR 679/2016, in order to ensure the appropriate security level against those risks. Those include, among others, as the case may be: **a)** application of encryption protocols **b)** the ability to ensure confidentiality (article 90 GDPR 679/2016), the integrity, availability, and resilience of processing systems and services on an ongoing basis, **c)** the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident, **d)** a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing. Moreover, ICAP PEOPLE SOLUTIONS shall take measures so as to ensure that any physical person acting under the authority of the data controller or of the processor, who has access to personal data, shall not process those data except on instructions from the data controller and limits access to your personal information to authorised employees.

Indicative security measures applied by ICAP PEOPLE SOLUTIONS are as follows:

- ICAP PEOPLE SOLUTIONS maintains a dedicated information security team that plans, implements and provides surveillance of our information security program
- The company controls the security and functionality of its products and services before they are introduced to the Internet, for any vulnerabilities in technology
- The company performs ongoing infrastructure checks to detect weaknesses and potential intrusions, vulnerabilities in systems etc.
- The company uses **https** protocols for secure and encrypted client communication with ICAP PEOPLE SOLUTIONS
- The company uses the open standard protocol to access Lightweight Directory Access Protocol (**LDAP**) directory services and uses encrypted passwords
- The company uses a Secure Sockets Layer (SSL) certificate to create an encrypted connection between the web server and the Client's/User's browser
- ICAP PEOPLE SOLUTIONS has been awarded with ISO 9001 και ISO 27001 certifications

9. Profiling

We use the information we obtain from third party sources such as a) profiling data related to Individuals ability/personality assessments 2) corporate employees ability/personality assessments

and reports, to in order to process, evaluate and categorize the data based on internal customer requirements. We may also carry out customized talent assessment, executive assessment, personality tests, 360 feedback, ability tests at the request of our customers.

Customers use the aforementioned data at their own discretion. We recommend to our customers to review and interpret the reports on their own based on their actual business requirements. Our customers may choose to use our evaluation reports alone or combine the reports with other information available to them. We do not encourage our customers to reject or approve under any circumstances employees or other individuals based on those reports.

10. Submission of Complaint - Appeal

- For any issue regarding the processing of your personal data, you may contact us via e-mail at privacy@icap-ps.com
- Moreover, you shall always be entitled to contact the Hellenic Data Protection Authority, which may accept the submission of relevant complaints in writing at its protocol in its offices at 1-3, Kifisias Street, Postal Code 115 23, Athens or by e-mail (contact@dpa.gr) in accordance with the instructions indicated on its website.
- If you no longer wish to receive newsletters from ICAP PEOPLE SOLUTIONS, please send an e-mail to privacy@icap-ps.com or follow the unsubscribe instructions included in each relevant email/communication.

11. Amendments

This policy may be renewed from time to time, due to amendments to the related legislation or change to the corporate structure of ICAP PEOPLE SOLUTIONS. Thereby, we encourage the Clients to periodically visit the Website so as to be informed regarding recent information of privacy practices. In any case, the Clients may be informed by e-mail or a notice in our Website regarding any amendments to this policy.