

Effective date: January 1, 2020

INTRODUCTION

We respect your privacy at NOBULL. This Applicant Personal Information Processing Notice (“Applicant Notice”) tells you what you need to know about our processing of your personal information when you apply for a job at NOBULL, either as an internal or external applicant.

PROCESSING YOUR PERSONAL INFORMATION

- **What do we collect?**
 - ❖ **Personal information provided by you, including first and last name, address, email address, phone number, gender, date and place of birth, nationality/citizenship, and government-issued identifiers (if permitted under applicable law, including your Social Security number and/or passport).**
 - ❖ **Personal information provided by you regarding your working skills, education, certifications, curriculum vitae and employment qualifications, including information provided by previous employers and other references, if permitted under applicable law.**
 - ❖ **Personal information provided by you when choosing to complete your professional profile in any recruiting platform utilized by NOBULL, including voluntarily updating your professional experience, business title, education, skills, etc.**
 - ❖ **Personal information obtained from a third-party when performing authorized reference checks, background checks, or verifying personal information you provided to us, if permitted under applicable law.**

- **Why do we collect it?**
 - ❖ **To fulfill our obligations as your current or prospective employer.**

For example:

- *If you are successful candidate, we process your personal information to begin formalizing our employment relationship.*

- ❖ For making recruitment or employment decisions.

For example:

- *To evaluate active candidates for a particular job opening.*
- *To follow the progress being made in the recruitment process.*

- ❖ To advance or defend NOBULL's legal rights.
 - ❖ To prevent or detect fraudulent or other unlawful activities.
 - ❖ To comply with a law, regulation or valid legal process and, in appropriate circumstances, cooperating with law enforcement.
 - ❖ For business planning and improving our operations.
 - ❖ For access control and company security.
 - ❖ To meet our legal obligations.
- Who else might receive it?
 - ❖ Your personal information is only to be processed by persons working for and on behalf of NOBULL on a need-to-know basis for the purposes described in this Applicant Notice.
 - ❖ When NOBULL engages third-party service providers for the processing of your personal information, they solely process your personal information based on our contract with them and for no other purposes.
 - ❖ NOBULL does not share your personal information with third parties unless required to do so by law (including external/governmental bodies), or as reasonably necessary with trusted service providers working for us to help us administer the recruitment process.

For example, we work with third-party service providers offering hosting services for our careers website. We also work with independent recruiters to help identify potential candidates for job openings.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will not retain your personal information longer than necessary. We are guided by this Applicant Notice, internal NOBULL record retention schedules, and applicable legal obligations.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

To operate our global business, we may need to transfer your personal information to countries other than your country of residence, and your personal information may be transferred to, processed in, or shared within the United States or countries in the European Economic Area. We make such transfers always in accordance with this Applicant Notice.

LEGAL DISCLOSURE OF INFORMATION

We may disclose your personal information to any institution, government, court, agency, or authority (including law enforcement agencies) to whom we are required to disclose it by law or as necessary to protect our legal rights or the rights of others, to prevent harm, or in accordance with your instructions.

SECURITY

We use commercially reasonable physical, procedural, and technical safeguards to deter unauthorized access, destruction, use, modification, or disclosure of your personal information. We instruct our employees that information must be handled in accordance with this Applicant Notice, and any misuse by employees may be subject to disciplinary action.

CHANGES TO THIS APPLICANT NOTICE



105 South St.
Boston, MA, 02111
nobullproject.com

It may be necessary for time to time for us to modify this Applicant Notice to reflect changes in the way we collect and use personal information or changes in privacy-related laws, regulations, and industry standards. We will provide reasonable notice of material changes to the Applicant Notice, including via links posted on the NOBULL careers web page.

WHO TO CONTACT

Please feel free to contact a member of the NOBULL Human Resources Department if you have any questions regarding our Applicant Notice or about the use of your personal information.

hr@nobullproject.com

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