

PRIVACY NOTICE FOR JOB APPLICANTS

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

Forextime Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, education, training, employment history, qualifications, skills and knowledge information in regards to participation in any company that was penalized or in any Forex business.
- Any information you provide to us during an interview.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about criminal convictions and offences.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect the following categories of data: your curriculum vitae and work experience data, references from the previous employers, results of the interviews held by the agency.
- Your named referees, from whom we collect the following categories of data: your previous work experience and achieved results.

- The following data from third parties is from a publicly accessible source: your work experience, curriculum vitae data, references.

5. HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the related work OR role
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the relevant position since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and online application, we process the information to decide whether you meet the basic requirements to be shortlisted for the role. If yes, then a phone interview follows. The phone interview is giving us the opportunity to further shortlist you and proceed to the next stage, that is pre-employment assessment. All information gathered are processed and if your candidacy is considered strong enough, we proceed to interviews. Number of interviews depends on the nature and level of position. We will use the information you provide to us up to this stage to decide whether to offer you the role you have applied for. If yes, then we will take up references **AND/OR** carry out a criminal record **AND/OR** carry out ANY OTHER check before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

6. INFORMATION ABOUT CRIMINAL CONVICTIONS

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the role for the position that you have applied for (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by Cyprus Securities and Exchange Commission (CySEC) to carry out criminal record checks for our potential employees.

7. AUTOMATED DECISION-MAKING AND PROFILING

We may use pre-employment automated tests; cognitive and behavioral test that aim to measure a candidate's suitability to a specific position or the employer. By behavioral tests we are able to identify your personality characteristics in terms of four main drives; your need for dominance, your need for extraversion, your need for patience and your need for formality. In other words, we aim to understand your behavioral

tendencies check your job fitness by interpreting the way you interact and influence people, how you deal with rules and structure, and how you prefer to take in information etc. Cognitive tests are just an indicator of how easily a person will be learning rather than a criterion for hiring and job fit. We keep actual cognitive scores confidential even among internal stakeholders and the results will be communicated in a very general way only if the candidate fits the job after assessing all factors of hiring.

This automated decision making-processing and profiling does not produce any significant or any other legal effect against you while the hiring decision making-process involves human intervention as well. The above results will not be used as the sole determining factor in the hiring process but these will be combined by our recruiters with other factors like your education, job experience, qualifications, interview factors, personality etc.

You may see your results and an explanation of the automated decision and profiling or to request fully human intervention to the processing by sending an email to recruitment@forextime.com. During these processes, FXTM takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors and to secure your personal data.

8. DATA SHARING

Why might we share your personal information with third parties?

We will only share your personal information with:

- a) a third party that provides an Online Candidate Application System to assist with our recruitment process.

We use the third-party service provider to process personal information as a data processor on our behalf. The third-party service provider is only entitled to process your personal data in accordance with our instructions.

Where you apply for a job opening posted by us, this Privacy Notice will apply to our processing of your personal information.

- b) Internal third parties being other companies in the Forextime Ltd group and other affiliated companies which are based in EU as well as in Non-EU countries, if you are applying for a role in a jurisdiction other than the one you are based in. We also share your personal information with our internal third parties in case they are looking for candidates with professional backgrounds similar to yours. For the full list of entities which form part of the Forextime Ltd group, with their geographical location, please contact the HR department in writing at: recruitment@forextime.com.

All our third-party service providers and other entities in the group and affiliated companies are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality and relevant Data Processing or Joint Controller Agreements have been signed. Details of these measures may be obtained from the Data Protection officer of the Company at DPO@forextime.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. DATA RETENTION

How long will we use your information for?

We will retain your personal information for a period of 1 year after we have communicated to you our decision about whether to appoint you to the relevant position. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy which can be provided to you upon your request. However, where there is any activity on a candidate's profile in the last 6 months, like comments, emails or evaluations of your personal information, the retention period will be commencing from the date of the latest activity.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

11. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR department in writing at: recruitment@forextime.com.

12. RIGHT TO WITHDRAW CONSENT

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that

purpose at any time. To withdraw your consent, please contact the HR department in writing at: recruitment@forextime.com.

Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

13. DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at DPO@forextime.com. You have the right to make a complaint at any time to the Commissioner of Personal Data Office (CPD), the Cyprus supervisory authority for data protection issues.