
Recruitment Privacy Notice (Tier 4) ¹

Document Control
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RECRUITMENT PRIVACY NOTICE

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Document Change Log

| Issue | Date of Issue DD-MM- YYYY | Change Description | Pages affected | Approval |
|-------|---------------------------------|--------------------------------------------------------------|----------------|----------|
| 1 | 12-02-2018 | Initial issue | All | |
| 1.1 | 11-02-2019 | Change the title to Quality, Process & Data Security Officer | 8-9 | |
| B | 10-01-2020 | Revised according to internal updates | All | |

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Document Owner and Approval

The Quality, Process and Data Security Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above. A current version of this document is available to all members of staff on the corporate intranet and is shared by partners/subcontractors.

This policy was approved by the Board of Directors and is issued on a version controlled basis under the signature of the Chief Executive Officer (CEO).

Signature:

Date:

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1. Introduction

ATG Europe and its subsidiaries and affiliates (“ATG Europe”, “us” or “we”), understand that your privacy is important to you. ATG Europe may process your personal data in their capacity as data controllers. We are committed to respecting your privacy and protecting your personal data, which is any information that enables identifying you as an individual person. This Recruitment Privacy Notice (“Privacy Notice”) describes how we handle and protect your personal data in connection with ATG Europe recruiting processes and programs.

This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment. It does not apply to our employees, contractors or clients, or other personal data that ATG Europe collects for other purposes.

As used in this Privacy Notice, “personal data” means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels (e.g. email, via other recruitment firms).

We will process your personal data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail.

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.
- 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. 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 ATG Europe

2. Collection of personal data

The types of personal data that we request from you and the ways that we process it are determined by the requirements of the country and/or the location of the position(s), and not the country in which you reside. In some countries, you may have different rights under local law than you do in your country of residence.

We usually collect personal data directly from you when you apply for a role with us, such as your name, address, contact information, work and educational history, achievements, and test results. We also may collect personal data about you from third parties, such as professional recruiting firms, your references,

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prior employers, ATG employees with whom you have interviewed, and employment background check providers, to the extent this is permitted by applicable law.

Sensitive personal data is a subset of personal data and includes ethnicity, health, trade union membership, philosophical beliefs, sexual orientation, as well as other categories as prescribed by law. We do not seek to obtain and will not collect such data about a candidate unless permitted to do so by applicable laws and required by our customers, of which you will be duly informed.

3. Use of your personal data

We collect and use your personal data for legitimate human resources and business management reasons including:

- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- recordkeeping in relation to recruiting and hiring;
- ensuring compliance with legal requirements;
- conducting criminal history checks as permitted by applicable law;
- protecting our legal rights to the extent authorized or permitted by law.

We process your personal data for the purposes described above:

- when we have your consent to do so;
- when necessary to enter into an employment contract with you;
- when necessary for us to comply with a legal obligation or;
- when necessary for the purposes of our legitimate interests as an employer operating globally.

We do not make recruiting or hiring decisions based solely on automated decision-making.

4. Data recipients and international data transfers

Your personal data may be accessed by recruiters and interviewers working in the country where the position for which you are applying is based, as well as by recruiters and interviewers working in different countries within the ATG Europe organization. IT personnel within ATG Europe may also have a limited access to your personal data to perform their jobs.

It is inherent to our recruitment business line that personal data can be forwarded to our clientele or partners for purposes as detailed under section 3.

We use third party service provider- Bullhorn/Connexys; Salesforce edition- to provide us with a recruiting software system. Salesforce may keep customer data in the United States of America. Salesforce retains (if applicable) its certification under the EU US Privacy Shield Framework as updated or replaced with an equivalent regulatory scheme from time to time, binding corporate rules for processors, and/or implements such other international data transfer mechanism recognized by the European Data Protection Board or a relevant national Supervisory Authority. We also share your personal data with other third party service providers that may assist us in recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruiting practices. Any third parties that we may share your data with are obliged by ATG Europe to keep your details securely, and to use them only to recruitment purposes.

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5. Keeping your data

By applying to a position, any relevant personal data collected will become part of our database and will be stored for a period of 1 year after having consented to the Privacy Notice. After this period, you will be requested to renew your permission of retaining your personal data or you may decide to opt out any time (see section: Data access & Removal).

By applying proactively through e-mail or other means of communication your data will be manually entered into our recruitment software and only after consenting to our privacy statement your application will be handled.

If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with specific country requirements. If you enter into employment with ATG Europe, a different privacy notice will apply (end of scope of this document).

6. Security

We have implemented generally accepted standards of technical and operational security to protect personal data from loss, misuse, alteration, or destruction. Only authorized personnel of ATG Europe and of our third party service providers are provided access to personal data, and these employees and third party service providers are required to treat this information as confidential. Despite these precautions, we cannot guarantee that unauthorized persons will not obtain access to your personal data.

7. Data Access & Removal

We take reasonable steps that are designed to keep your personal data accurate, complete, and up-to-date for the purposes for which it is collected and used. We also have implemented measures that are designed to ensure that our processing of your personal data complies with this Privacy Notice and applicable law.

As per the General Data Protection Regulation (GDPR 2016/679/Chapter III/Article 15) you may have the right to request access to the personal data that we have collected about you for the purposes of reviewing, modifying, or requesting deletion of the data. You may have the right to request a copy of the personal data we have collected about you and to have any inaccuracies about you corrected. You may also request that we cease processing your personal data (GDPR 2016/679/Chapter III/Article 17).

ATG Europe at your request, can confirm what information we hold about you and how it is processed. If ATG Europe does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of ATG Europe or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal

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data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.

- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

In order to access your personal data, we implemented security measures. ATG Europe accepts the following forms of ID when information on your personal data is requested: passport, driving licence, ID card.

In addition, and where granted by applicable law, you may have the right to lodge a complaint with a competent data protection authority.

If you would like to make a request to access, review, or correct the personal data we have collected about you, or to discuss how we process your personal data, please contact us at datasecurity@atg-europe.com.

8. Cookies

See ATG Europe's Cookie Declaration at <http://www.jointhebrightestminds.com/en/cookie-declaration> for information on the cookies we use.

9. Contact

If you have any questions about this Privacy Notice or related matters, please contact us at:

ATG Europe
Noordwijk Space Business Park
Huygensstraat 34
2201 DK Noordwijk (ZH)
The Netherlands
datasecurity@atg-europe.com.

You may submit inquiries regarding personal data protection, privacy and security matters to our Quality, Process & Data Security Officer: Ms. Bertilla Sinka at datasecurity@atg-europe.com.

ATG Europe reserves the right to modify this Privacy Notice. We will post any changes do our Privacy Notice on this page. Please check this page regularly to keep up-to-date.