Privacy Notice for Candidates

Effective date: 05 December 2023

This Privacy Notice for Candidates ("**Notice**") provides information on how the INCRDBL group of companies (collectively, "**INCRDBL**", "**we**", "**our**", "**us**") processes your personal data during the recruitment process. The group company where you are being considered for a position will act as the data controller.

This Notice only applies to the processing of personal data of candidates who applied and/or are being considered for job openings at incrdbl. For information about how we process the personal data of our website users and players, please refer to our <u>Privacy Policy</u>.

This Notice is written in English (Русском) and can be translated into other languages at our discretion. In case of contradictions between the English version and its translations the English version shall prevail.

Where we collect your personal data

We may collect your personal data:

- Directly from you when you apply for a job opening on our website or job search platforms, via email, or in other interactions with us (e.g., game industry events)
- From online platforms used for sharing resumes, portfolios, and networking (e.g., LinkedIn, ArtStation) where permitted by the terms of such platforms
- From your references, recruitment agencies, or background check providers

Personal data we process

The specific set of personal data may vary but generally we process:

- Personal details such as your full name, URLs of your publicly available profiles, email address, telephone number, and other contact information
- Professional details such as your work experience, previous employment, education, skills, portfolio, professional licenses, certificates or other qualifications, employment references or referrals, participation in academic competitions and contests, the contents of your public professional profiles
- Interview information such as notes and comments generated by recruiters and interviewers based on your application or their interactions with you, including test assignment results

- Information on how you found out about the position you are being considered for
- Information on your current and desired compensation
- Additional information provided by third parties including references, professional networking platforms, recruitment agencies, or background check providers
- Your payment details and related information where applicable (e.g., for agreed reimbursements)
- Information on your past employment at INCRDBL or previous job applications and interviews
- Other information we need to make a job offer to you and to organize your employment, including relocation services provided to you and your family (e.g., place of residence, visa and immigration status) where applicable
- Information regarding the types of INCRDBL openings you might consider in the future

Normally we do not collect sensitive personal data (e.g., health and medical data) and discourage you from sending us such information, unless processing of such information is required by the applicable legislation – that being the case, we will specifically request such data from you.

How we process your personal data and on what legal grounds

We process personal data for the purposes of:

- Reviewing your qualifications and evaluating your suitability for a specific position or other potential opportunities in INCRDBL
- Communicating with you during the recruitment process
- Sourcing and approaching potential candidates
- Conducting background checks where permitted or required by law
- Making hiring decisions
- Checking for compliance with the necessary requirements for work in a particular country
- Improving our recruiting practices

- Contacting you about vacancies at INCRDBL which we think you may be interested in
- Complying with applicable laws and regulations, legal proceedings, enforcement actions

For the purposes of EU(RU) legislation we rely on several legal grounds when we process your personal data. We take steps prior to entering into a contract with you when you apply for a position or are considering employment at INCRDBL. We pursue our legitimate interest to ensure that INCRDBL is properly staffed with the right professionals when sourcing talent and proactively contacting potential candidates, as well as by storing your data to offer you opportunities in the future. In certain circumstances we may process your personal data to comply with our legal obligations.

With whom we share your personal data

We do not share your personal data with unauthorised third parties; however, as an international group of companies, we have entities and engaged partners in various countries. In order to achieve the above-mentioned goals, we may share your personal data with:

- Companies in the INCRDBL group other than the company at which you are being considered for a role (e.g., when you are interviewed by an employee of another INCRDBL group company)
- Our trusted suppliers who process your personal data on our behalf and in accordance with our instructions: Asana by Asana, Google Workspace by Google LLC and Slack by Slack Technologies Limited for communication. In addition, we may engage background checking agencies where permitted or required by law
- Governmental authorities where it is required by applicable laws

How long we keep your personal data

If your application is successful and you are hired by INCRDBL, your personal data will be retained as part of your employee profile. If your application is unsuccessful, then we will delete your personal data unless we think that you may be suitable for other roles at INCRDBL in the future. In this case we will store personal data in our talent pool for no longer than two years from the date we informed you about the decision on your application. If you do not want us to retain your personal data for consideration for future opportunities, please let us know by contacting us at support@incrdbl.me.

Data confidentiality

INCRDBL takes appropriate technical, organizational, and legal measures to ensure the confidentiality and security of your personal data. For instance, we allow access to the systems that contain personal data only to those employees who need it to perform their duties, conduct employee training to raise privacy awareness, and have processes to handle security incidents. We also have written obligations with our partners to ensure similar measures are taken by them to secure your personal data. However, no server or data transmission is 100% secure, therefore, we cannot guarantee or warrant absolute data security.

Your rights

You have the right to obtain a copy of your personal data, to ask for that information to be corrected, to object to the processing of your personal data, and to request its deletion. Depending on where you reside, you may have other rights. If you want to exercise any of these rights, please send us a request at support@incrdbl.me.

You also have the right to lodge a complaint with your local data protection authority. However, please contact us first so that we can address your concerns.

Contact

If you have questions regarding this Notice or you have a request regarding your personal data, please send us an email at support@incrdbl.me.

Changes to this Notice

We may update this Notice at any time by publishing an updated version here. Should we make any changes, we will amend the revision date at the beginning of this Notice.