

# Alpaca Recruitment Privacy Policy

*Policy last reviewed or updated: May 15, 2024*

AlpacaDB, Inc., and its subsidiaries and affiliates (“Alpaca”, “us”, “we”), understand that your privacy is important and we are committed to respecting your privacy and protecting your personal data, which is any information that is capable of identifying you as an individual person. This Recruitment Privacy Policy (“Privacy Policy”) describes how we handle and protect your personal data in connection with Alpaca’s recruiting program.

This Privacy Policy only applies to the personal information of job applicants, potential candidates for employment, and our optional recruiting programs and events. This Recruitment Privacy Policy does not apply to our employees, contractors, or clients, or to other personal data that Alpaca collects for other purposes.

Some of our online recruiting activities enable access to external sites operated by third parties, which are not governed by this Privacy Policy. Alpaca does not take responsibility for the privacy practices of these third-party sites to which we link. We encourage you to review the privacy policies of any such sites before you submit information there.

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

By submitting your personal data to us, you acknowledge that:

- You have read, understood, and agree with the use of your personal data as set out herein
- Your personal data may be transferred and processed worldwide, for the purposes and in the manner specified in this Privacy Policy
- You are not required to provide any requested information to us, but your failure 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, and you have not knowingly omitted any related information of an adverse nature
- Providing any inaccurate information may make you ineligible for employment
- This Privacy Policy does not form part of any contract of employment offered to candidates hired by AlpacaDB, Inc. or any of its subsidiaries or affiliates.

## **Personal data we collect**

The types of personal information that we request from you and the ways that we process it are determined by the requirements of the Alpaca office’s country in which the position is located, and not the country in which you reside. If you apply to more than one location or if the role to which you apply is available in more than one country, the types of personal information we request from you and the ways that we process it are determined by the requirements of all Alpaca offices’ countries in which the position is located. We usually collect personal data directly from you which can include your name, address, phone number, photographs, employment and educational history, achievements, identity documents, and data relating to your recruiting performance. If you receive an offer from us, we may then conduct a background check and, to the extent permitted by applicable law, we may also collect data related to criminal offences and proceedings under the control of the competent public authorities.

We also collect similar personal data about you from third parties, such as professional recruiting firms, your references, prior employers, Alpaca employees with whom you have interviewed or who recommended your candidacy, and, to the extent permitted by applicable law, employment background check providers. We may also collect personal data about you online to the extent that you have chosen to make this information publicly available. For example, we may find your profile on professional social media websites (such as LinkedIn), and contact you about suitable roles.

Sensitive personal data is a subset of personal data that includes ethnicity, health, trade union membership, philosophical beliefs, sexual orientation, and other categories as prescribed by law. We do not seek to collect sensitive personal data when we ask you, however, we may collect some optional sensitive personal data about a candidate to the extent permitted to do so by applicable laws (e.g., U.S. equal

opportunity laws) and to support our efforts to create an inclusive and diverse work environment. We may also collect sensitive personal data to the extent that a candidate chooses, without being asked, to voluntarily disclose it during the recruiting process.

## **Use of your personal data**

We collect and use your personal information for the following purposes:

- recruiting and business management reasons;
- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- maintaining records in relation to recruiting and hiring;
- ensuring compliance with legal requirements;
- fostering our diversity and inclusion programs and practices;
- conducting background checks to the extent permitted by applicable law, and if you receive an offer from us;
- protecting our legal rights to the extent authorized or permitted by law; or
- emergency situations where the health or safety of one or more individuals may be endangered.

We may also analyze your personal information or aggregated data to improve our recruitment and hiring process and augment our ability to attract successful candidates.

We process your personal information 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. You may withdraw your consent at any time by sending an email to [privacy@alpaca.markets](mailto:privacy@alpaca.markets).

## **Legal basis for processing your personal data**

Our processing of your personal data for the purposes mentioned above is based:

- in part, on our legitimate business interest in evaluating your application to manage our relationship with you, to ensure that we recruit appropriate employees, and to evaluate and maintain the efficacy of our recruiting process more generally;
- in part, on our performing contractual and precontractual measures relating to our potential employment relationship with you;
- in part, on our complying with applicable law with regard to personal data necessary to satisfy our legal or regulatory obligations.

## **Background screening**

If you receive an offer from us, we may conduct a background check on you or instruct a third party to do so on our behalf. Background screening will only be done where permitted by the law applicable to the location where the position is located and to the extent necessary and proportionate to the role that you are being offered. Our legal basis for background screening is our need to perform pre-contractual measures related to establishing our employment relationship. If background screening is required for your application, you may be contacted by a third-party background screening service provider to request authorization for the release of your information, and at that time you will be provided with further information about the process and what personal data it might involve.

## **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. Individuals performing administrative functions and IT personnel may also have limited access to your personal data to the extent necessary to perform their jobs.

We use third-party service providers to provide recruiting software systems. We also share your personal data with other third-party service providers that may assist us in identifying and recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruiting practices.

We maintain processes designed to help ensure that any processing of personal data by third-party service providers is consistent with this Privacy Policy and protects the confidentiality, availability, and integrity of your personal data in compliance with applicable law. Where

required by law, we put in place additional mechanisms designed to help ensure adequate data protection of your personal data in a third country.

In addition, we may disclose or transfer your personal data in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

### **How long will we retain your information?**

If you accept an offer of employment with 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 and with the privacy policy applicable to Alpaca employees.

If we do not employ you, we may nevertheless continue to retain and use your personal data for a period of time (which may vary depending on the country) for system administration purposes, to consider you for potential future roles, while ensuring your data is secured on our systems using encryption at rest. Thereafter, we retain a minimal amount of your personal data to record your recruiting activity with us.

### **How do we protect your information?**

We use generally accepted standards of technical and operational security to protect personal data. Only authorized personnel of Alpaca and of our third-party service providers are permitted to access personal data, and these employees and third-party service providers are required to treat this information as confidential. Despite these precautions, however, Alpaca cannot guarantee that unauthorized persons will not obtain access to your personal data and Alpaca cannot be held responsible for any actions resulting from a breach of security when information is supplied over the internet or any public computer network.

### **Your rights**

In accordance with applicable data protection laws, including but not limited to General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), you have a right to request a copy of the personal information we hold about you and details of how we use that information. If any of the information held about you is incorrect or out of date, you have the right to amend or rectify it. Please contact us as outlined below and we will amend our records where appropriate. You also have the right to require us to erase your personal data, stop processing your personal data, restricting the processing of your personal information, right of portability of your personal information, and withdraw your consent to processing. This may not apply if there are other legal justifications to continue processing.

You have the right to revoke any consent to processing that has been given to us as the Controller of data. Using this right may however, mean that the User can not apply for a specific job or otherwise use the Service.

If you think we may have incorrect personal information or would like a copy of the personal information we hold on you, or to exercise any other data protection right, please email [privacy@alpaca.markets](mailto:privacy@alpaca.markets).

You also have a right to lodge a complaint with your local supervisory authority.

For all requests set out above, please send us an email with "Data privacy request" in the subject line. Where required under applicable law, we may ask for a copy of your identity card or another proof of your identity (for example, driver's license) to help us prevent unauthorized individuals from accessing, changing, or deleting your personal data.

### **Social Media Tools**

Our application process allows you to provide us with relevant personal data from the information you have on third-party websites (such as LinkedIn). If you choose to incorporate your personal data from third-party websites, it will be used in accordance with this Privacy Policy.

### **Cookies**

When you use the Recruitment Services, information about the usage may be stored as cookies. Cookies are passive text files that are stored in the internet browser on the User's device, such as computer, mobile phone or tablet, when using the Service. We use cookies to improve the User's usage of the Service and to gather information about, for example, statistics about the usage of the Service. This is done

to secure, maintain and improve the Service. The information that is collected through the cookies can in some instances be personal data and is, in such instances, regulated by our Cookie Policy.

Users can at any time disable the use of cookies by changing the local settings in their devices. Disabling of cookies can affect the experience of the Service, for example disabling some functions in the Service.

## **CONTACT**

If you have any questions about our Privacy Policy, please contact us at:

AlpacaDB, Inc.

Privacy Department

3 East Third Ave, Suite 214

San Mateo, CA 94401

+1 650 489-2017

[privacy@alpaca.markets](mailto:privacy@alpaca.markets)

Alpaca reserves the right to modify this Privacy Policy and any changes to this policy will be posted on this page.