RECRUITMENT PRIVACY NOTICE

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Introduction

Thank you for your interest in Impulse Dynamics Inc. (referred to as “Impulse Dynamics”, “We, “Our” or “Us”). We are committed to protecting the privacy and security of your Personal Data.

This Privacy Notice is intended for recruitment candidates located within the European Union (EU), European Economic Area (EEA), United Kingdom (UK), USA or elsewhere globally.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information.

You have been directed to or otherwise sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker, contractor or consultant). This notice 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 Data Protection Legislation and explains how your Personal Data will be processed.

Personal Data means any information or piece of information which could identify you either directly (e.g. your name) or indirectly (e.g. a unique ID number).

If anything in this Privacy Notice conflicts with local law in your jurisdiction, local law prevails.

The controller of your Personal Data

Impulse Dynamics are the Data Controller for the Personal Data that we process about you during recruitment process.

Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, the Data Protection Legislation means the General Data Protection Regulation (Regulation (EU) 2016/679) (‘EU GDPR’). This includes any replacement legislation coming into effect from time to time. Depending on your location, additional legislation might also apply.

In the UK, Data Protection Legislation means the Data Protection Act 2018 (‘DPA 2018’), United Kingdom General Data Protection Regulation (‘UK GDPR’), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (‘PECR’) and any legislation implemented in connection with the legislation mentioned above.

In the USA, Privacy Legislation may comprise a combination of federal and state laws, rather than a single comprehensive framework. At the federal level, this may include the Federal Trade Commission Act (‘FTC Act’) and where relevant, the Fair Credit Reporting Act (‘FCRA’) (in relation to background checks) and sector-specific laws such as the Health Insurance Portability and Accountability Act (‘HIPAA’), as applicable. At the state level, this may include laws such as the California Consumer Privacy Act (‘CCPA’), as amended by the California Privacy Rights Act (‘CPRA’), and other similar state privacy laws enacted from time to time. Depending on the location of individuals whose data is processed and the nature of the processing, additional state-specific legislation may also apply.

We have appointed a Data Protection Officer (DPO) to help us monitor internal compliance, inform and advise on data protection obligations, and act as a point of contact for data subjects and supervisory authorities. To locate the relevant contact details, please see the Contact Us section below.

The Personal Data we collect about you

Personal Data Category	Personal Data
Basic information	Your name (including prefix or title), gender, civil status, age and date of birth
Contact information	Any information you provide to us that allows us to contact you, e.g. your personal or business email address, personal or business mailing address, personal or business telephone numbers, emergency contact information
National identifiers	Your national ID, passport details, driving licence details, residency and work permit status, national insurance number, SSN or other taxpayer/government identification numbers
Recruitment information	Information related to your education, work experience, references, and referees. Information relating to education and academic achievements as well as professional qualifications. Information contained in application forms and resumes, such as education, professional qualifications, languages and other relevant skills. Information as a result of background checks (including previous employers, references, credit checks, and criminal record checks, where applicable). Information relating to interviews, including notes, audiovisual recordings, etc.
Financial information	The proposed salary, pension, stock options, stock grants, company allowances, bonus, benefits, insurance and other awards forming part of the compensation package, and effective date of current compensation, bank details
Expenses information	Where you have incurred expenses and Impulse Dynamics has agreed to reimburse the expenses, any information provided in your expense request and information needed by Impulse Dynamics to process such request according to its policies, e.g. location, invoices, car licence plate number (if applicable), travel invoices and receipts and other receipts
Audiovisual recordings	We may collect photographs, video and audio recordings of you, e.g., recording videoconference meetings, or when you upload or share your photographs and videos for recruitment purposes
Infrastructure interactions	Information generated by Impulse Dynamics to enable your use of our IT assets, systems, networks and communication channels during the recruitment process. Information related to your use of our IT assets, systems, networks and communication channels during the recruitment process.
Opinions	Information you provide when you participate in our feedback surveys or conversation channels.
Special Category Personal Data	Information related to your: • Ethnicity/ race • religious or philosophical beliefs • health • sexual life details • sexual orientation
Criminal Convictions and Offences Data	Information related to your unspent criminal convictions and offences.

Personal Health Information (PHI)	• Not Applicable
Sensitive Personal Information (SPI) (CCPA/CPRA)	Information that is PII and includes: • Social security numbers (SSN), driver's license numbers, state identification card or passport numbers • financial account for direct deposit •

You can decide whether to give us special categories of information if we ask you for them. If you decide not to share these with us, please be assured this does not affect your application.

You can also choose not to give us the other types of Personal Data when we ask you for them. If you decide not to give us your Personal Data, we may not be able to assess or consider your application.

If you give us the Personal Data of another person, e.g. your spouse/partner or referees, we assume you have their permission to share their data with us.

How we collect your Personal Data

We collect your Personal Data when you:

- Apply for a job at Impulse Dynamics via our Careers webpage or through a third-party recruitment agency and participate in our recruitment process.
- Interact with our Human Resources team.
- Sign up to receive open job posts.
- Otherwise provide it to us.

We will also collect your information through:

- Recruitment agencies.
- Background and pre-employment check providers.
- Credit reference agencies.
- Your named references.
- Social media platforms (such as LinkedIn) or other publicly available sources.

How we use your Personal Data

Personal Data Category	Lawful Basis	Purpose
• Basic information • Contact information	Our **Legitimate Interest** in recruiting talent	**Recruitment** For recruitment purposes, including, but not limited to: suitability reviews (applications, CVs, interviews); maintaining

• Recruitment information • National identifiers • Audiovisual recordings • Infrastructure interactions • Opinions • Criminal Convictions and Offences data	*GDPR, Article 6(1)(f)*	recruitment records; screening, background checks, credit checks, and criminal record checks; and, sourcing references, where applicable.
• Basic information • Contact information • Recruitment information • National identifiers • Financial information • Infrastructure interactions • Special Category Personal Data (health)	**Contractual Obligation** *GDPR, Article 6(1)(b)*	**Successful Recruitment** For successful recruitment purposes, including, but not limited to: verification of identification documentation; collecting personal, financial, and health information to prepare for your forthcoming employment.
• Basic information • Contact information	**Contractual Obligation** *GDPR, Article 6(1)(b)*	**Communication** Communicating with you and facilitate your communication with others.
• Basic information • National identifiers • Recruitment information • Financial information • Special Category Personal Data (health)	**Legal Obligation** *GDPR, Article 6(1)(c)*	**Legal Obligations** For the purposes of complying with legal, regulatory and other requirements, including, but not limited to: checking Right to Work documentation; reviewing vehicular insurance and associated documentation; complying with local employment, social security and occupational health laws and regulations; record-keeping and reporting obligations; and, complying with government inspections and other requests from government or other public authorities.
• Basic information • Contact information • Dependant information • Special Category	**Vital Interest** *GDPR, Article 6(1)(d)*	**Vital Interest** Monitor your health in order to safeguard and protect you, or to act in your vital interest, or the vital interest of a third party.

Personal Data (health)		
• Basic information • Contact information • Employment information	Our **Legitimate Interest** in maintaining a candidate pool *GDPR, Article 6(1)(f)*	**Retaining Unsuccessful Candidate Data** Retaining your candidate information in order to potentially invite you to apply for a similar role in the future.
• Basic information • Special Category Personal Data (Ethnicity, Religious or Philosophical Beliefs, Health data, Sexual Orientation)	**Public Interest** *GDPR, Article 6(1)(e)*	**Equal Opportunity Monitoring** Where you are applying to Impulse Dynamics, we may use information about your ethnicity, religious or philosophical beliefs, health data (including any disabilities), or sexual orientation, for equal opportunity monitoring and reporting purposes. You can opt out of equal opportunity monitoring at any time by using the contact details provided in the Contact Us section below.

Why we collect and use your Personal Data

We only process your data when we have one of the following lawful bases:

- Where we have a legitimate interest to do so. It is in our legitimate interests to decide whether to appoint you as it would be beneficial to our business to appoint a suitable qualified individual for the advertised position.
- Where we have a contractual obligation, or to take steps at your request to enter into a contract with you. We will only do so should you be successful in receiving a job offer.
- We may need to process your Personal Data for any legal obligations, such as processing Right to Work documentation.
- We may need to process your information where it is in your vital interests, or in the vital interests of a third party.
- We may ask for your consent to retain your Personal Data on file for a period pursuant to our data retention schedule, on the basis that a further opportunity may arise in future and we may wish to consider you for that. If you have questions regarding our data retention of your personal data, contact our DPO at privacy@impulsedynamics.com.

If you fail to provide information when requested, which is necessary for us to consider your application, 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.

How we use particularly sensitive Personal Data

Special Category Personal Data

Special Category Personal Data	Condition for Processing	Purpose

• Health data	**Employment Law** *GDPR, Article 9(2)(b)* **Employment and Anti-Discrimination Law (U.S.)** *ADA, FEHA (California), CCPA/CPRA (California)*	**Reasonable Adjustments** We may use information about your health or disability status to consider whether we need to provide reasonable adjustments to your recruitment or interview process (e.g., if you are disabled).
• Health data	**Vital Interest** *GDPR, Article 9(2)(c)*	**Vital Interest** To act in your vital interest, or the vital interest of a third party.
• Ethnicity • Religious or Philosophical Beliefs • Health data • Sexual Orientation	**Substantial Public Interest** *GDPR, Article 9(2)(g)* **EEO laws (U.S.)** *(ADA, ADAE, Title VII of the Civil Rights Act of 1964, EEOC, FEHA)*	**Equal Opportunity Monitoring** We may use information about your ethnicity, religious or philosophical beliefs, health data (including any disabilities), or sexual orientation, for equal opportunity monitoring and reporting purposes, in accordance with all applicable laws, and in accordance with applicable U.S. employment and anti-discrimination laws and best practices. Providing this information is voluntary and you can opt out of equal opportunity monitoring at any time by using the contact details provided in the Contact Us section below.

Criminal convictions and offences data

Depending on the jurisdiction in which you operate and on your specific role, we may collect information about your criminal convictions and offences if we offer you a position with us and you accept (conditional on checks and any other conditions, such as references, being satisfactory). We do this to satisfy ourselves that there is nothing in your criminal convictions and offences history which makes you unsuitable for the role. Our roles require a high degree of trust and integrity, and it is therefore best practice to undertake such checks and a pre-requisite in some instances.

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

We have in place appropriate policies and safeguards which we are required by law to maintain when processing such data.

Automated decision making and AI Use

You may be subject to decisions that will have a significant impact on you based solely on automated decision-making., e.g. role qualification requirements are not met.

As part of our ongoing efforts to improve the efficiency we may use some artificial intelligence (AI) tools that support communication and system functionalities. Some of the third-party software tools may process your

personal data, such as Microsoft o365 suite of applications including Connected Experiences including the Microsoft Copilot functionality, an AI tool. Other systems, such as Paycor , utilised by us may also include AI features and functionalities that may process your personal data.

Throughout the application process, your personal data may be processed within the Microsoft office 365 suite of applications. This processing is carried out in accordance with Microsoft's privacy and security standards. For more information about how Microsoft may process your personal data, see the Microsoft privacy statement which can be accessed here: Microsoft Privacy Statement – Microsoft privacy. If you have any questions or concerns about this processing, please contact our Data Protection Officer on the contact email address set out in the 'Contact us' section.

Our use of AI tools for processing your personal data is carried out on the basis of our Legitimate Interests. We balance our interests against your data protection rights and apply appropriate safeguards to protect your personal data.

How long we keep your Personal Data

We will retain your Personal Data for no longer than six (6) months-12 months after we have communicated to you our decision about whether to appoint you. We retain your Personal Data 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 Data in accordance with our data retention policy and relevant Data Protection Legislation.

The recipients of your Personal Data

We will only share your Personal Data with the following third parties for the purposes of processing your application:

- recruitment agencies;
- our HR management and recruitment system;
- parties involved with pre-employment background checks, Right to Work and VISA applications; and
- third parties provided as referees and so on.

All our third-party service providers are required to take appropriate security measures to protect your Personal Data 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.

International transfers of your Personal Data

Impulse Dynamics uses service providers in multiple countries. Therefore, we may need to transfer and use your Personal Data outside of the country where we collect it from you. We implement appropriate measures to protect your Personal Data when we transfer your Personal Data outside of your home country. This includes and having appropriate agreements in place to protect your data, such as data transfer agreements that incorporate standard data protection clauses. You can request a copy of the standard contractual clauses we use from our DPO using the contact details in the Contact Us section below.

How we protect your Personal Data

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. If you would like additional assurances regarding how we process data securely, please contact us as set out below.

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.

Your rights regarding your Personal Data

You have rights we need to make you aware of. You may have the right to:

- Ask us for copies of your Personal Data. There are some exceptions, which means you may not always receive all the information we process.
- Ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Ask us to delete your Personal Data, in certain circumstances.
- Ask us to restrict the processing of your information.
- Object to our processing of your Personal Data.
- Ask that we transfer information you have given us from one organisation to another, or to give it to you.
- Withdraw your consent, where you have previously provided it to us.
- Complain to your local data protection authority.

Under CCPA (California Privacy Rights Act)

The California Privacy Rights Act (CCPA/CPRA) gives employees in California specific rights over their personal information.

You have the following rights:

- You may request to know what personal information we collect about you, the sources, purposes the information is used for, and categories of recipients of your information. You can ask for all the personal data we have about you, not only the last 12 months but if your data has been kept longer than a year, you may request everything we have about you since January 1, 2022, or choose a specific time period.
- You may request deletion of your personal information, subject to legal or operational exceptions.
- You may request correction of inaccurate personal information held by us.
- You may opt out of any "sale" or "sharing" of your personal information (note, we do not sell employee data).
- You may ask us to restrict the use of your sensitive data to essential employment-related purposes only.
- You may request information about automated tools used for processing of your personal data that may result in decisions affecting you (e.g., applicant screening) and request an appeal of the ADMT decision outcomes. You may also have the right to opt out of the use of ADMT for significant decisions where applicable.
- You must be informed as to how long your data is kept by us or the criteria used to determine retention periods.
- You have a right to not be treated differently or penalized for exercising any of your privacy rights.

Any Other Global Region

Laws in different countries give individuals different privacy rights. If you work outside the EU/EEA or the United States, you still have rights over your personal data. These rights may vary depending on your local laws, but they generally include the ability to:

- Access your personal information we hold about you
- Request corrections if any of your information is inaccurate or incomplete
- Request deletion of your information, where permitted by local law
- Object to or limit certain types of processing, such as profiling or unnecessary data collection
- Withdraw consent where consent was given.
- Raise concerns or complaints about how your personal data is handled.

To exercise any of these rights, you can contact us using the information in the Contact Us section below.

For your protection, and to protect the privacy of others, we may need to verify your identity before complying with your Request.

If you object to us using your Personal Data or withdraw consent for us to use your Personal Data, after initially giving it to us, we will respect your choice in line with the applicable law. However, by objecting or withdrawing your consent, we may not be able to complete the recruitment and pre-employment screening activities described above.

If you are in the UK, you have the right to lodge a complaint at any time to the Information Commissioner's Office (ICO) Make a complaint | ICO, the UK supervisory authority for data protection.

If you are in the EU or EEA, you also have the right to lodge a complaint at any time with the relevant supervisory authority responsible for data protection. For a list of the relevant supervisory authorities, please see Our members | European Data Protection Board.

If you are located in the United States, you may raise any questions, concerns, or complaints about the Company's handling of your personal information directly with the Privacy Lead or HR Team using the contact details provided in the Contact Us section of this notice.

Candidates may also choose to contact the California Privacy Protection Agency (CPPA) if they reside in California and believe their rights under the California Consumer Privacy Act (CCPA/CPRA) have been violated. California Privacy Protection Agency (CPPA): https://cppa.ca.gov.

If you live in a country with its own data-protection authority, you may also have the right to contact that authority directly to make a complaint or to ask for guidance. If you are unsure which local regulatory authority applies to you, contact our Data Protection Officer who can help you identify the correct regulatory authority and provide support in submitting a request or raising a concern.

Our responsibility regarding websites and applications that we do not own or control

Our careers portal and recruitment pathway may contain links to websites or mobile applications we do not own or control. Our Privacy Notice does not cover this processing. Please read the privacy notices on those websites and mobile applications if you would like to find out how they collect, use and share your Personal Data.

Updates to this Privacy Notice

We may change this privacy notice from time to time (for example, if the law changes). We recommend that you check this notice regularly to keep up-to-date.

Contact Us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this notice or the way your Personal Data is processed, please contact us by one of the following means:

Our Data Protection Officer (DPO) and Privacy Officer: privacy@impulsedynamics.com

Thank you for taking the time to read our privacy notice.