
Windward Recruitment Privacy Notice

About this notice

We, at Windward put great efforts in making sure that we secure personal information related to you and use it properly. This notice explains our privacy practices and how we handle personal information related to you when you apply for a job with Windward. Specifically, this notice will provide details about:

- ✓ what personal information needs to be submitted by job applicants ("**Candidates**"),
- ✓ what we do with that information and how we process it, and
- ✓ the rights that you as a Candidate have in connection with the personal information and job application materials that you submit during the process.

Personal Information means any information relating to an identified or identifiable natural person.

Please take the time to read this notice and the general Windward Privacy Policy, and do not hesitate to contact us if you have any questions about the job application process, your privacy rights, or our privacy policy in general. You can contact Windward's privacy team at: privacy@wnwd.com.

1. Purposes for Collecting and Processing Personal Information

We collect personal information related to you for recruiting purposes - so that we could assess your candidacy and suitability for a job with Windward, whether it is the position that you applied for, or other vacant positions, to be in contact with you during the recruitment process and to prepare to offer you an employment contract if we decide to hire you.

We also use personal information related to you for Windward's human resources' management in general

- ✓ to maintain Windward's HR record keeping;
- ✓ to comply with diversity, inclusion and other legal requirements and to protect Windward's legal rights;
- ✓ to combine personal information related to you with information such as criminal background checks (where permitted by law) that Windward receives from third party service providers; and,
- ✓ when Windward believes in good-faith that using personal information related to you is necessary to protect the life, health, safety or other vital interest of Windward or any other person.

2. Personal Information That We Collect

When you apply for a job at Windward, we will ask you to provide certain personal information that will help us evaluate your qualifications and candidacy and to stay in touch with you during the application and recruitment process. The Information we collect includes but is not limited to the following:

- ✓ Personal information connected to the identification of a Candidate such as: first name, surname, title, date of birth;

- ✓ Contact information such as: address (street, zip code, country), phone number, email address;
- ✓ Eligibility information such as: resume/CV, cover letter, employment history (employers, job titles, length of employment) and educational background and training, linguistic capabilities, job skills, personal interests;
- ✓ Verification and background information and documents such as: diplomas, certificates, national IDs, driver's license, passport, social security;
- ✓ Reference materials and documents such as: job references and letters of recommendation, job salary/payment history, military records, titles and licenses, immigration visa status, security clearance, background checks including criminal history (where permitted by law);
- ✓ Social media information such as your LinkedIn profile;
- ✓ Information that you provide us about your work and personality traits such as answers during an interview, or answers to essay questions, or information about your salary expectations and work preferences;

When you visit our 'Careers' page on our website, or view job positions, or click on the 'Apply for This Position' button for specific positions, we and our third party service providers, collect information such as the IP address of your device, which provides your device location, and other non-identifiable information that is used for analytical purposes, such as the type of browser, browser language, type of operating system, domain name of Internet service provider, web pages visited, times and dates of visits and the content you access on and/or through the Site.

3. How we Collect Personal Information

If you use our website to apply for a job with Windward, our HR platform service provider will collect personal information related to you on our behalf. Comeet Technologies, Inc. is our third-party service provider that handles our job recruitment process (see further information in the Sharing Personal Information section below).

4. Legal Basis for Processing Personal Information

Our legal basis for processing personal information collected about you in the EEA/EU is based on the following:

- ✓ Processing personal information related to you is a legitimate interest of Windward as it is necessary for us to fulfill our hiring and employment needs, for us to evaluate the qualifications and backgrounds of Candidates, and to communicate with you throughout the recruitment process.
- ✓ Processing personal information related to you is necessary for our compliance with legal obligations such as complying with immigration and employment laws and regulations.

In certain circumstances, we will request you to explicitly consent to processing personal information related to you for a job application (for example, in some countries outside of the EU/EEA, we are required to receive your explicit consent before processing personal information related to you as part of the application process).

If we process personal information related to you based on your consent, you can withdraw your consent at any time with future effect (although this may have an effect on our ability to consider your job application).

Withdrawing consent will not affect the lawfulness of any processing we conducted prior to the withdrawal and will have no effect on mandatory processing of your information under applicable law.

5. Your Choice

Applying for a job and submitting your job candidacy materials is voluntary and at any time, if you have already applied for a job and would like to withdraw your job candidacy, you can contact us and request that we stop considering your application and that we delete your profile and any materials we collected.

Our deletion of personal information related to you and job application materials will be completed in accordance with our Retention policy as described below in this notice.

If you were required to provide explicit consent before submitting your job application materials and personal information, you can revoke your consent at any time. You can exercise your choice by contacting us at: info@wnwd.com.

6. Yes, we use Cookies

Windward uses both Session Cookies and Persistent Cookies for various purposes as further detailed in Windward's general privacy policy, which is available at: https://wnwd.com/pdf/windward_privacy_policy.pdf.

7. Accessing Personal Information

If you are entitled to exercise the rights of access, rectification and deletion of inaccurate data, you can contact us at: privacy@wnwd.com and request to exercise such right with regard to the personal information that we keep about you.

We will ask you to provide us certain credentials to make sure that you are who you claim to be and will make good-faith efforts to locate the personal information related to you.

In responding to your request, we will apply limitations available under applicable law, for example to protect our trade secrets and confidential information and to protect the privacy of others.

To the extent that you are entitled to a right of access under the applicable law, you can receive a copy of personal information related to you that we hold about you and request the correction, amendment or deletion of personal information related to you, if it is inaccurate or if you believe that the processing of such information is in violation of applicable law.

We will use judgement and due care to redact from the data which we will make available to you, personal information related to others.

8. Your Additional Rights as a Candidate in the EU/EEA

If you are a Candidate in the EU/EEA, you have the additional following rights:

- ✓ **Right to restriction of processing** - You have the right to request that we restrict or limit processing of personal information related to you.
- ✓ **Right to object** – You have the right to object to our processing of personal information related to you.
- ✓ **Right to data portability** – We process your data based on our legitimate interests or compliance with legal obligations. Therefore, you do not have a right to have personal information related to you transmitted to another controller.

- ✓ **Right not to be Subject to a Decision Based Solely on Automated Processing** - We may use our service providers' automated platforms to identify appropriate Candidates and process their personal information. However, our decision whether to hire you or not is made by our HR staff.
- ✓ **Right to file a complaint** - You have a right to lodge a complaint with a data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation (EU) 2016/679 ("GDPR").

Please contact us at: privacy@wnwd.com, if you wish to make a request to exercise your rights or if you have a question about your rights.

If you would like further information about your rights or if you believe that we are misusing or have misused personal information related to you, please contact your local data protection authority. Here is a link to the contact details of EU data protection authorities: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

9. Retention of Personal Information

We store your job application documents and content for three (3) months after we have completed the job recruitment process for the respective position for which you have applied. We then delete the application documents from all our systems.

However, we will maintain a record with details about your submission of the application with us, such as your name, interview dates and locations, our decision whether to hire you or not and other relevant information, for archival purposes, to establish exercise and defend legal claims and if we are required under law to retain personal information related to you.

Retention periods can vary based on how long the recruitment process lasts and the time period between when you first apply and when a hiring decision is made in connection with your application.

You can let us know that you would like us to save personal information related to you for a longer period of time to take into account for future job postings.

You can contact us to request to exercise any choice or rights you may have in connection with our retention of personal information related you at: privacy@wnwd.com.

10. Sharing and Transferring Personal Information

We will share personal information related to you in the following instances:

- ✓ With any of our affiliated entities.
- ✓ With Windward's relevant employees to facilitate your application and the job recruitment process.
 - We will share personal information related to you only to the extent necessary for the purposes of the recruitment process and we will do so in accordance with this privacy notice.
- ✓ With our third-party service provider, which is a data processor that handles our job recruiting, hiring, and on-boarding process, or with any additional providers or a successor to ,which will help us with the recruiting process.
 - Privacy Notice can be found at: <https://help.comeet.com/en/articles/3134994-privacy-notice>.

- ✓ With third party service providers that provide legitimate business functions for Windward, which will include processing personal information related to you. Such third-party service providers are engaged by us for the provision of, among others, data storage, information security and employee background checks.
- ✓ With a competent supervisory authority, if we believe doing so is in accordance or otherwise required by an applicable law, regulation, judicial or legal process.
- ✓ With law enforcement or other authorities (including immigration, health, tax, national security) when it is necessary to protect the interests of Windward or individuals.

11. Transfer of Personal Information Outside Your Territory

If you are a resident in a jurisdiction where transfer of personal information related to you to another jurisdiction requires your consent, then you hereby provide Windward your express and unambiguous consent to such transfer.

To the extent necessary under EU privacy laws and regulations, Windward will implement data onward transfer instruments, such as the Controller to Processor EU-US Standard Contractual Clauses, the Privacy Shield Framework and a statement of compliance with the Privacy Shield Principles.

12. Contact Us

If you have any questions about this privacy notice or have any concerns about how we handle personal information related to you, please contact us at: privacy@wnwd.com.