

Candidate Privacy Notice

The aim of this Candidate Privacy Notice (“**Notice**”) is to inform the candidates intend to apply for employment with [ABBYY group](#) (“**candidates**” or “**you**”) on the collection, use, disclosure, transfer, and other processing of their individually identifiable information (“**Personal Data**”) by ABBYY USA Software House, Inc. with registered office at 860 Hillview Ct., Suite #330, Milpitas, CA 95035 , mail hr@abbyy.com (the “**Company**” or “**we**” or “**us**”).

1. Personal Data

Throughout the course of your application for an employment with us, we process certain Personal Data about you. The Personal Data we process includes the following categories (where applicable to your application):

- **Contact and personal information:** mandatory information such as full name, including title, date of birth; nationality; gender; telephone numbers, home address, email address, as well as voluntary information provided by you such as, place of birth; photos or skype or other messengers address;
- **CV information;**
- **Education information:** education history, degrees, certificates, qualifications, language proficiencies;
- **Work Experience information:** current and former employments including title and job position, employer and its type of business, main responsibilities, job function, verification of previous employment and experience, and criminal record information;
- **Other information and documents:** e.g., current notice periods / availability; salary expectations; application letters; certificates; mobility (preferred job locations).

If you do not provide us with the required Personal Data, we may not be able to perform your job application. We will inform you when providing your Personal Data is necessary and what the impact will be on our relationship if you do not provide it.

We, in general, do not process specific categories of personal data, such as health related data, unless you disclose such information voluntarily to us, e.g., because you want us to respect specific statutory obligations such as, e.g., applicable to the employment of persons with handicap conditions. Otherwise, we will not process such data for the application process.

2. Sources of Personal Data

We may obtain Personal Data from the sources listed below:

- directly from you, such as through your data input into our separate application database that is separate from other Human Resources systems;
- through our activities in the course of the review of your application, including our internal decision-making procedures; and
- from third parties, including references and other background screening checks, former employers, online social networks (e.g., LinkedIn), online job boards, and employment recruitment agencies, subject to the requirements of applicable law.

3. Purposes for processing Personal Data

The Company processes your Personal Data for purposes of processing your job application, facilitating job interviews, carrying out additional research if required, finding our internal decisions on your application as well as a potential employment with us and administrating our applications and communicating with you. We are committed to the lawful processing of your personal data in accordance with data protection laws, which in certain jurisdictions require us to have a valid legal basis to do so. In most circumstances, we rely on our legitimate interests (where they are not overridden by your interests or fundamental rights and freedoms), for the performance of a contract with you (or in order to take steps prior to entering into a contract with you) or to comply with our legal obligations. In certain circumstances, we may rely on your consent, which may be implied (e.g., where you have volunteered information for use by us) or express (in accordance with applicable law). Where we rely on your consent as a legal basis, you may withdraw your consent at any time for any processing activities that we conduct based solely on your consent.

4. Disclosure of Personal Data

While the Company is administrating and organizing candidates’ applications, positions advertised can be with different ABBYY group companies that may act as your future employer. ABBYY group operates as a functional structure where employees are grouped together according to their area of specialization, regardless of their location or location of their immediate manager or employer within ABBYY group. Therefore, the positions

advertised may be either global or regional positions. When you register for the purposes of your application, your Personal Data will be stored in a separate application database located in the EU which is provided by our vendor. Within ABBYY group your Personal Data is accessible only by those authorized personnel within ABBYY group who need access to your Personal Data to perform their duties for the purposes listed in Section 3 above. If required for the decision-making of your employment and maintaining of the global intra-group recruitment and related HR processes within ABBYY group, we are also entitled to share your application with authorized personnel of our affiliated companies. The Company may additionally share your Personal Data with our customers for the purposes of our legitimate business interests, including appropriate work assignment management purposes and the need for our customers to be reassured that our service provision meets their requirements in the course of your recruitment process.

The Company may use third-party service providers to process personal information on its behalf, including for information storage, human resource administration and similar purposes. While our application database located in the EU, it is being provided by a cloud services provider located in the USA and engaged by Company to help manage its recruitment and hiring process on Company's behalf. Your Personal Data may be also transferred to servers in the US for essential business activities, including technical support, and others. That transfer to US data centers is for essential activities only, and the data is not stored there, as it is stored in the EU. The Company will exercise appropriate due diligence in the selection of its third party service providers, and require that such providers maintain adequate technical and organizational security measures to safeguard your Personal Data, and to process your Personal Data only as instructed by the Company or a member of the ABBYY group and for no other purposes.

Notwithstanding the above disclosures, we will disclose the personal data we collect from you under the following circumstances: (i) when required or permitted by law or government agencies, (ii) when required valid requests by law enforcement, (iii) for purposes relevant to corporate policies, background checks or litigation of Company to the extent permitted under applicable law or when it is prescribed in the applicable legislation.

5. International transfer of Personal Data

Due to the multinational character of the ABBYY group, some of the affiliated companies and other recipients listed in Section 4 above may be located in countries that do not provide a level of data protection equivalent to that set forth by the law in your home country. The Company will take appropriate steps to make sure that such recipients act in accordance with applicable law.

Data transfers outside of the EU:

To the extent that the Company transfers the Personal Data to recipients which are located outside the European Union or the European Economic Area, the Company will provide an adequate level of protection of your Personal Data, including appropriate technical and organizational security measures and through the implementation of appropriate contractual measures to secure such transfer, in compliance with applicable law. To the extent required, we have appropriate agreements on data protection in place (for example, controller-to-controller or controller-to-processor data transfer agreements, or data processor agreements).

For these international data transfers, the Company uses standard contractual clauses in the form approved by the European Commission (https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en). For more information, please visit https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en (further explanations of the European Commission of the Standard Contractual Clauses with links to English).

You are entitled, by sending your request to our HR team hr@abbyy.com or our Data Protection Officer using the below contact information, to receive a copy of the contract including the appropriate safeguards (for example, Standard Contractual Clauses) that have been taken to protect your personal data during such transfer.

6. Data security

We maintain physical, technical, and organizational security measures to protect the Personal Data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed in your local jurisdiction, the United States, or elsewhere. Our IT policy governs how we protect your Personal Data.

7. Retention and Accuracy of Personal Data

We intend to keep your Personal Data accurate and up-to-date.

We will delete or anonymize your Personal Data after 6 (six) months counted from the end of your job application process, save same basic information of name, address, kind of application and result (which we keep managing

further applications of you in the future).

We are entitled to keep your CVs, cover letters, copies of certificates and diplomas, questionnaires, interview notes longer than the end of the application process based on your voluntarily consent to keep your application data for a longer period if you want us to keep your application available for other jobs than the one you applied for (in case we might be able to offer you another position at a later time).

8. Your data subject rights

Under applicable law, you may have rights in relation to your personal data. These rights may include the right to:

- Obtain confirmation as to whether or not your personal data is being processed by us, and where that is the case, access to such personal data (and related details);
- Obtain rectification of inaccurate personal data and to have incomplete personal data completed;
- Obtain erasure or deletion of your personal data;
- Obtain restriction of our processing of your personal data or object to processing of your personal data;
- Receive your personal data in a structured, commonly used and machine-readable format and to transmit such data to another controller where feasible;
- Know about the existence of Automated Decision-Making and to not be subject to automated decision-making;
- Withdraw your consent to processing your Personal Data at any time, without affecting the lawfulness of processing of your Personal Data based on consent before its withdrawal. We may, however, have other legal grounds to continue to process your Personal Data;
- Lodge a complaint with the applicable supervisory authority applicable supervisory authority about the Company's processing of your Personal Data. The list of the appropriate supervisory authorities can be found here: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080 ; and
- Obtain additional information about the suitable safeguards and means we rely upon with regard to international transfer of personal data.

You will not be discriminated against for exercising any of your rights described in this Notice. Please note that these rights may be subject to further conditions, limitations and/or exemptions under applicable data protection laws. If any of the rights listed above are not provided under law for your jurisdiction, we have absolute discretion in providing you with these rights.

If you wish to raise concerns with the Company, please contact our HR team at hr@abbyy.com .

9. EU Residents Only

Under applicable European data privacy laws including, but not limited to, the General Data Protection Regulation 2016/679 (“**GDPR**”) and national laws specifying GDPR, the Company is the data controller with respect to the Personal Data of the candidates. We use several legal basis for processing of your Personal Data. We are entitled to process your Personal Data, in each case according to the relevant purpose, including the Company's contractual, (i.e. the establishment, administration and termination of the employment contract according to Art. 6 (1) lit. b GDPR, and legal obligations (Art. 6 (1) lit. c GDPR), as well as its legitimate business interests (Art. 6 (1) lit. f GDPR), as well as in some cases when he have asked specifically for your consent (Art. 6 (1) lit. a GDPR). These purposes form the legal basis under the Data Privacy Laws for the processing described in this Notice. For example, the legal basis to keep your data optionally in an applicant database for future positions is your consent (Art. 6 (1) lit. a GDPR). We may also rely on consent, where required in law, for processing certain types of special categories of Personal Data such as criminal record checks and/or reference checks.

Our legitimate interests or those of a third party include our requirements to use your Personal Data in litigation or for other legal purposes involving the Company and/or any affiliate of the Company within ABBYY group, verification of experience and qualifications and our business interests and may also include the need to transfer your Personal Data to third countries without adequate data protection laws. In this event, we will take reasonable steps to protect your Personal Data as required by the Data Privacy Laws. If you wish to raise concerns with the Company, please contact our HR team at hr@abbyy.com or our Data Protection Officer using the below contact information: Robert Niedermeier; niedermeier@db5.io.

11. California Residents Only

As required by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “**CCPA**”), this supplemental California privacy notice (“**California Notice**”) is intended to provide certain disclosures about our handling of California residents' personal information and describe the rights

that California residents have with respect to their personal information. When we use the term “personal information” in this California Notice, we are using that term as the CCPA defines it, which the CCPA generally defines “personal information” as information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Personal Information We Collect

We have collected the following categories of personal information from consumers in the preceding 12 months:

CATEGORY OF PERSONAL INFORMATION (AS SPECIFIED IN THE CCPA)	INFORMATION COLLECTED
Identifiers	Data such as your name, date of birth, telephone number, home address email address, skype address and other similar identifiers.
Characteristics of Protected Classifications	We may also ask you to provide us with demographic information such as age, national origin, gender identity.
Internet or Other Electronic Network Activity Information	Data such as your browsing history, search history and information regarding your interaction with our career website.
Audio, Electronic, Visual, Thermal, Olfactory or Similar Information	Data such as your image and video footage captured by closed circuit television (CCTV) and call and video recordings.
Professional or Employment-Related Information	Data such as your employer and your title or role.
Education Information	Data such as your educational history, degrees, certifications, and qualifications.

The Company processes your Personal Data for purposes of processing your job application, facilitating job interviews, carrying out additional research if required, finding our internal decisions on your application as well as a potential employment with us and administrating our applications and communicating with you.

In addition to the rights outlined above, California residents may have the rights listed below in relation to personal information that has been collected about you. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights may include:

- Right to Opt out of Selling or Sharing. You have the right to direct a business that sells or shares personal information about you to third parties to stop doing so.
- Right to Restrict Use of Sensitive Personal Information. You have a right to request that we limit our processing of sensitive personal information under certain circumstances.
- Right to Non-Discrimination. We will not discriminate against you for exercising any of your rights under the CCPA.

Authorized Agent. Generally, if you are a California resident, you may designate an authorized agent to make a request to access or a request to delete on your behalf. To do so, you must: (1) provide that authorized agent written and signed permission to submit such a request; and (2) verify your own identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf. We will respond to your authorized agent's request if they submit proof that they are registered with the California Secretary of State to be able to act on your behalf, or submit evidence you have provided them with power of attorney pursuant to California Probate Code section 4121-4130. We may deny

requests from authorized agents who do not submit proof that they have been authorized by you to act on their behalf, or are unable to verify their identity.

California Shine the Light Act. Under California Civil Code Section 1798.83, California residents with an established business relationship with us can request information once a year about sharing their personal information with third parties for the third parties' direct marketing purposes. We do not share personal information with third parties for their direct marketing purposes. If you'd like to request more information under the California Shine the Light Act, you can contact us via the email provided in the Questions/Contacts section below.

12. Questions /Contacts

If you have any questions about this Notice or wish to (i) access or review your Personal Data or learn more about who has access to your Personal Data, or (ii) make another type of request related to your Personal Data, please contact our HR team: hr@abby.com or contact our Data Protection Officer/Privacy Officer at Email: niedermeier@db5.io or Physical Address: 530 Lytton Avenue Palo Alto, CA 94301.

13. Changes to the Notice

Should we materially change our Personal Data practices or this Notice, we will issue a revised Notice and/or take other steps to notify you of the changes in accordance with applicable laws. If you want to receive previous version of the notice, contact out HR team: hr@abby.com.

This Notice was issued on July 4th, 2023.