

Recruitment Privacy Notice for Job Candidates

Altman Solon, LP (together with our subsidiaries, “Altman Solon,” “we” or “the company”) is committed to respecting and protecting your privacy. This Privacy Notice describes how we collect, use, disclose, store, and otherwise process information in relation to Altman Solon’s recruiting.

Please read this notice carefully as it contains important information on the personal information that we collect, why we collect it, how long we keep it, and whether it is sold to or shared with third parties. This notice will be updated regularly.

1. Information we collect from you.

The types of personal data collected and processed by Altman Solon are subject to the requirements of the jurisdiction in which the role you apply for is located and the jurisdiction in which you reside.

Altman Solon may collect and process the following information about you as part of the recruitment and application process:

- Personal information and identifiers, including your first and last name, phone number, physical address, email address, gender, and any other identifying information shared as part of the application process.
- Employment data, including the name of your current or most recent employer; title at current or most recent employer; information contained in documents submitted by you, such as resumes and cover letters.
- Educational data, including the name of your educational institutions; type of degree and major or concentration; grade point average; information contained in documents submitted by you, such as resumes, cover letters, and transcripts.
- Other data related to and collected during the recruitment process, including the date of application; the job(s) you have applied for; the source of your application; compensation expectations submitted by you; your interview history; responses to interview questions; interview feedback and comments by your interviewers; the results of your candidate online assessment; records of communications between you and Altman Solon; the status of your candidacy and final disposition; date of final disposition; and details of an offer of employment, if applicable.
- 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 may collect sensitive personal data about a candidate to the extent permitted or required 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 also may collect, to the extent permitted by law, your responses to sponsorship and visa questions. Under limited circumstances and to the extent permitted by applicable law, we may also collect sensitive personal information relating to health and medical characteristics, to address our public health and workplace safety obligations, to provide reasonable accommodations to facilitate the interview process (in case of disabilities) and to protect the company and its employees, clients, and third parties.

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2. Information we collect from other sources.

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 to the extent permitted by applicable law and to the extent such screening is necessary and proportionate to the role. A background check will only involve criminal background data to the extent permitted by law.

We may also collect information from other outside sources related to your candidacy, including from recruiters, employment references, and public social media information (i.e., your LinkedIn profile).

3. Use of your personal data

Information that Altman Solon collects during the candidacy process is used to evaluate your potential employment and communicate with you regarding recruitment. Information collected will become part of your personnel file if you become an employee. Data may be used for the following purposes:

- Identifying and evaluating candidates for potential employment, including for future roles that may become available.
- Maintaining human resources records related to recruiting and hiring.
- Ensuring compliance with legal requirements, including requirements to retain certain data for specific periods of time as specified by the law of a specific country or jurisdiction.
- Implementing diversity and inclusion programs and practices.
- Conducting background checks to the extent authorized by applicable law.
- Ensuring that we recruit appropriate employees and evaluating the efficacy of our recruiting process.
- Protecting our legal rights to the extent authorized by applicable law, and protecting the workplace and communicating with medical professionals, law enforcement, or other public authorities in the event of an emergency or public health event, such as when the health or safety of you or one or more individuals may be endangered.
- Responding to any questions, complaints, or claims made by you or on your behalf.

4. Legal basis for processing your personal data.

Altman Solon processes your personal data for the purposes above based on one or several of the following legal bases:

- Our legitimate business interest in evaluating candidates for employment, including future employment; ensuring that we recruit appropriate employees and evaluating the efficacy of our recruiting process; operating in our business and protecting the company and its employees, clients, and third parties. When relying on this legal ground, Altman Solon will only process your personal data after assessing the adequacy, proportionality, and legitimacy of the data processing activity.
- Performing contractual and pre-contractual measures related to the potential employment relationship.

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- Complying with applicable law regarding personal data to satisfy our legal and regulatory obligations.
- Based on your consent, in the case of your voluntary participation in a recruitment program or candidate pool, or in collecting sensitive personal data for legally permitted purposes.

5. Data recipients and international data transfers

Your personal data may be accessed by recruiters and interviewers working in the country in which the position is based and the country in which you are based, as well as by recruiters and interviewers working in different countries where Altman Solon operates. Legal rights and requirements regarding personal data collection and processing may vary by country. We have legal mechanisms in place to ensure adequate data protection for your personal data when it is processed by Altman Solon, including the transfer of your personal data to countries other than the one in which you reside. Administrative and IT personnel within Altman Solon may have access to your personal data only to the extent necessary perform their jobs.

We use third-party service providers to provide a recruiting software system, and the personal information described above may be shared with such providers. 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.

When you have applied for a job opening through a third-party service provider not affiliated with Altman Solon, we may disclose your information to the provider. In this instance, the provider shall be the data controller of this data and will be responsible for complying with applicable laws regarding the collection and processing of that data.

Except to the extent necessary to accomplish the uses and purposes described in this Privacy Notice, we do not disclose your personal data to third parties. We also prohibit our service providers from using your personal data for outside purposes. We do not otherwise share or sell your personal data to third parties. Altman Solon maintains processes to help ensure that any processing of personal data by third-party services is consistent with this Privacy Notice and complies with applicable law. Where required by law, we also have additional legal mechanisms to ensure adequate data protection where data is transferred to another country.

6. Automated sorting of applications

Altman Solon may use data analytics and algorithms to help review large quantities of candidates and application data. Any algorithmic sorting is based on professional characteristics relevant to the role, such as specific prerequisite skills for certain positions (i.e., fluency in a certain language, specific professional certifications, or level of education). Any automated results are assessed in tandem with other information about the candidate and based on human judgment.

7. Data security

The security of your personal information is of the utmost importance to Altman Solon. We use industry standard technical and operational safeguards to protect your information from unauthorized disclosure. We make all attempts to ensure that only necessary and authorized personnel of Altman Solon and our service providers may access your information. Such personnel are required to treat your information as confidential.

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8. Your rights

Altman Solon is committed to protecting your data in compliance with this Privacy Notice and applicable law. You have the following rights regarding the personal data Altman Solon collects and processes (as such term is defined in the applicable jurisdiction):

- The right to request information about the personal data we store about you and how we use that data; and the right to request a copy of your personal data.
- The right to correct, update, or otherwise amend your personal data.
- The right to the deletion or deidentification of your personal information, except where Altman Solon has a legal obligation to maintain such information; and the right to request that we stop or limit the processing of your data.
- The right to withdraw your consent for the processing of your personal data, where the legal basis for our processing is based upon consent and not another legal basis or requirement.
- The right to make your data portable in order for you to transfer your data to another party.
- The right to know who we have disclosed your personal information to.
- The right to not be discriminated against for exercising these rights.
- The right to request review of our responses to the above by Altman Solon's data protection officer or, if applicable, Altman Solon's designated data protection officer for your jurisdiction.
- The right to seek additional legal remedies available in your jurisdiction.

If you would like to exercise your rights, please contact us at recruiting-americas@altmansolon.com.

9. Data retention

Altman Solon will not retain your personal information for longer than necessary for the purposes set out in this Privacy Notice. When it is no longer necessary to retain your personal information, we will delete or anonymize it, unless you have provided consent for Altman Solon to retain your data for future purposes.

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 the requirements of the country you are located in and with the employee Privacy Notice, which will be provided during the on-boarding process.

If we do not employ you, we may nevertheless retain and use your personal data for a period of time (which may vary depending on the state, country, or jurisdiction) for system administration purposes, to consider you for potential future roles, and for internal analytics and research purposes, unless you opt-out of such uses personal information. Thereafter, we retain a minimal amount of your personal data to record your recruiting activity with us.

To the extent that we have collected personal data, including sensitive personal data, for the specific purpose of fulfilling legal obligations, we will retain that data for the duration of those

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legal obligations. Thereafter, we retain a minimal amount of your personal data to establish our compliance with those obligations.

Altman Solon may consider your application for future job opportunities, and will retain your candidacy information as long as needed to continue considering your candidacy. You may withdraw your information from Altman Solon's candidate pool by contacting us at recruiting-americas@altmansolon.com.

10. Changes to this Notice

Altman Solon reserves the right to modify, add, or remove portions of the Privacy Notice at any time without notice, except where notice is required by law. The date of the last update is included at the top of this document for your reference.

11. Contact information

If you have any questions or concerns about this notice or the information we collect about you, please contact us at recruiting-americas@altmansolon.com or dataprotection@altmansolon.com.