

# Truecaller Candidate Privacy Policy

## 1. Introduction

This Truecaller Candidate Privacy Policy (“Policy”) applies to the processing of your personal information when you apply for a position at a Truecaller group company. The Truecaller group company where you have applied for a position is the controller of the personal data that Truecaller obtains from you and the other sources described below.

This Policy explains 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 the applicable laws.

## 2. Personal data we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

Type of Data	Description
Application Data	<p>Personal data provided by you or the person who referred you. This includes:</p> <ul style="list-style-type: none"><li>• Contact information, such as your name, home address, email address, phone number and any other contact information;</li><li>• Details related to your education and employment experience, such as your CV or resume, cover letter, academic qualifications, transcripts;</li><li>• Information about the type of employment you are looking for or may be interested in, current and/or desired salary and other terms relating to compensation and benefits packages, willingness to relocate, or other job preferences;</li><li>• Publicly available information from publicly available sources that we believe is relevant to your application or a potential future application (e.g. your LinkedIn profile);</li><li>• Details of how you heard about the position you are applying for;</li><li>• Other information provided by you in support of an application and/or the application and recruitment process.</li></ul>
Interview Data	<p>Personal data collected for on-site interviews (such as ID number or passport information if we arrange your travel) and/or from interviews and outcomes of any assessments you complete (e.g. personality tests) as part of the interview screening process.</p>

Background Check Data	Information received to conduct background checks (such as national identification number, proof for residency) and from internal and external reference and background checks, including criminal records at offer stage only as permitted by applicable laws;
Immigration and Visa Data	Information related to your immigration status and visa requirements.
Voluntary Demographic Data	On a voluntary basis, we ask you to provide us with demographic information such as gender or information about your citizenship and/or nationality. This information will only be used to help us to evaluate and improve our diversity and belonging efforts on an aggregate level.

**3. Our purpose for processing your personal data**

The table below sets out our purpose for processing your personal data, our legal basis for each purpose and categories of personal data which we use for each purpose. We may also process your information (on an aggregated level) to perform analyses in order to understand, maintain, evaluate and improve our hiring process.

<b>Categories of personal data used</b>	<b>Purpose for processing your data</b>	<b>Lawful basis for processing</b>
Application Data	To communicate with you about the recruitment process	Legitimate interests
Application Data Interview Data	To assess your skills, qualifications, and suitability for the considered job	Legitimate interests
Application Data Background Check Data	To verify your provided information and carry out background and reference checks, where applicable	Legitimate interests Consent Legal obligation
Application Data Interview Data	To consider you for, and inform you about future job opportunities	Consent
Application Data Immigration and Visa Data	To prepare your employment agreement if you are offered a job at Truecaller	Contract
Application Data	To assist you with obtaining	Legitimate interests

	an immigration visa or work permit (if requested by you)	Legal obligation
Application Data Interview Data Background Check Data Immigration and Visa Data	To comply with applicable laws, regulations, legal processes or enforceable governmental requests	Legal obligation
Voluntary Demographic Data	To support our diversity and inclusion efforts	Consent

**4. Automated decision-making**

You will not be subject to decisions based on automated decision-making (making a decision solely by automated means without any human involvement). You should note however that automated decision-making may form a proportionate part of our recruitment processes. For example, we may use online recruitment systems that facilitate the exclusion of candidates that do not meet certain prescribed requirements for the position in question.

**5. Data sharing**

As we operate at a global level, we may transfer your personal data to third party service providers such as applicant tracking systems or background check providers. These service providers may be located outside the country in which you live or the country where the position you have applied for is located. Your information may also be shared with our affiliates, subsidiaries in other jurisdictions in relation to the purposes described above. We may also be required to disclose your information to external third parties such as to local labor authorities, courts and tribunals, regulatory bodies and/or law enforcement agencies for the purpose of complying with applicable laws and regulations, or in response to legal process.

We might also share your personal information with other third parties if we have your consent (for example if you have given us permission to contact your referees), or to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of Truecaller, our users, candidates, employees or the public or as otherwise required by law. It is your responsibility to obtain consent from referees before providing their personal information to Truecaller.

When we transfer your personal information to a country other than your home country, we will ensure that appropriate safeguards are in place to protect that transfer such as contractual obligations being imposed on the recipients of your personal information. For example, for international transfers from the European Economic Area we will use standard contractual clauses to ensure that your personal information is adequately protected.

**6. Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. 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.

## 7. Data retention

If you apply for a job at Truecaller and your application is unsuccessful (or you withdraw from the process or decline our offer), we will retain your information for a period of 3 years after your application. We retain this information for various reasons, including in case we face a legal challenge in respect of a recruitment decision, to consider you for other current or future jobs at Truecaller and to help us better understand, analyze and improve our recruitment processes. After this period, you will be asked to renew your consent to retain your personal information for a fixed period on the basis that a further opportunity may arise in future and we may wish to consider you for that. If you do not renew your consent, we will securely destroy your personal information.

If you do not want us to retain your information for consideration for other roles, or want us to update it, please contact us via contact details below. Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

If your application leads to you becoming a Truecaller member, relevant information we collect about you during the hiring process will become a part of your employment record and retained in accordance with our privacy policies for employee data.

## 8. Your rights

In certain countries, you may have certain rights under data protection law. These include the right to:

- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you.
- **Request the transfer** of your personal information to another party.

Where we have relied on your consent to processing your personal information for the purposes of the recruitment exercise, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing before the withdrawal of your consent. To make this kind of request, please use the contact details listed at the end of this Policy. Depending on your country of residence, you may also raise any questions or concerns you have regarding your personal information with your local data protection authority.

## **9. Contact us**

For any questions or concerns about this Policy, or if you would like to exercise any of your rights explained above, please contact our Data Protection Officer by emailing [dpo.eu@truecaller.com](mailto:dpo.eu@truecaller.com)

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