

RECRUITMENT PROCESS PRIVACY POLICY - INFORMATION TO DATA SUBJECTS (GDPR's ARTICLES 13 AND 14)

ATOBE – MOBILITY TECHNOLOGY, S.A.

This Policy intends to define the applicable practices to personal data processing under the scope of recruitment processes by ATOBE - Mobility Technology, S.A. (hereinafter “company”), namely, the purposes of use, the form of collection and processing, storage periods and the means of contact to exercise the rights of data subjects while job applicants.

1. Scope

This Policy applies to personal data processing collected by the company during the recruitment process, specifically from those applicants who freely submit voluntary applications for future recruitment, by means of:

- a) portal/platform made available for this purpose;
- b) spontaneous application submitted by institutionalized means; or
- c) other recruitment activities carried out by the company or specialized recruitment companies.

2. Data Controller

The company is the data controller of personal data collected in the recruitment and selection processes, developed for the purpose of recruiting and selecting applicants under the terms and as described in this Policy.

3. Categories of Personal Data

The company shall process the applicant’s personal data provided directly or indirectly (e.g. provided to recruitment and selection companies), information provided by third parties given as references or recommendations, under the scope of background checks and assessment of competencies and from publicly available recruitment sources.

During the recruitment process, the following personal data are processed:

Type	Personal Data
Identification data and contact information	Full name, date of birth, nationality, area of residence, telephone numbers, email address
Foreign applicants	Nationality, country of residence, visa and/or passport and any information regarding the applicant's immigration status
Relevant information to assess the applicant's technical and behavioural aptitude	Academic qualifications, professional and academic experience, position applied to, salary information, references and letters of recommendation CV and any other information attached to it, such as copies of school certificates and diplomas Other relevant information under the company's Policies and applicable laws

This table serves only as an example and the data or information requested dependent on the type of role and business area for which they are intended.

The company does not wish nor wants to receive or process any sensitive personal data relating to racial or ethnic origins, political orientations, trade union membership, religious or philosophical beliefs, health, life or sexual orientation. Should the applicant send data of this nature, the applicant allows its retention thereof during the timeframe defined in this policy. This data shall not undergo any other processing.

Any processing for statistical purposes, for equal opportunities monitoring, following the end of the selection and recruitment process, shall be done using anonymised data.

During the recruitment process, no decisions are made using automated means.

The applicant is responsible for the statements and personal information they make available and ensures that disclosure of the information provided, concerning third parties, has been previously authorised and prior consent has been obtained so that said personal data can be processed as described in this data processing Policy.

4. Purpose of Processing and Grounds

The company shall process all personal information provided by applicants with confidentiality, solely for the purposes of recruitment and selection according to corporate needs, which includes the detailed analysis of information compiled for the qualification of the applicant's technical and behavioural aptitude for a given role(s), pre-contractual procedures and conclusion and execution of contracts.

The processing of personal data for the abovementioned purposes has the following grounds:

- a) The applicant's free and intentional application for personal data processing upon voluntary submission thereof; and/or
- b) The enforcement of legal obligations the company is subject to; and/or
- c) The pursuit of the company's legitimate interest in hiring and the applicant's legitimate interest in being hired.

The applicant's personal data shall not be used for purposes other than those described in this Policy without prior information and consent being granted.

5. Processors

The company may transmit applicants' data to subcontracted entities solely for the abovementioned purposes. The company only uses processors who ensure the implementation of technical and organizational measures are appropriate to the protection of the data subjects' data, ensuring the protection of their rights under the applicable legislation in force.

6. Storage Period of Personal Data

The company shall store your personal data for the period necessary to fulfil the purposes for which they have been collected and processed. The time period during which the company shall hold or store the applicant's personal information shall depend upon the application scope and/or recurrence and frequency of the type of role necessary for the recruitment process, which could serve a continuous purpose and, therefore, entail a longer retention and storage period.

Notwithstanding, the applicants' personal data shall not be stored by the company for more than ten years from the end of the recruitment process or application submission, if it concerns an application for a specific role or a spontaneous application, respectively.

7. Exercise of Rights of Personal Data Subjects

The company ensures the implementation of appropriate technical and organizational measures for the protection of personal data, ensuring protection of the data subjects' rights under the applicable law in force.

The personal data subject has the following rights regarding personal data protection: right to access, right to rectification, right to erasure, right to limitation of processing, right to portability, right to object and right not to be subject to automated decisions.

According to the applicable law, applicants may, at any time, exercise their rights by written request addressed to ATOBE – Mobility Technology, S.A., Quinta da Torre da Aguilha, Edifício Brisa, 2785-599 São Domingos de Rana (Portugal).

The exercise of these rights may be subject to the provisions of the applicable legal regulations in each case and to this Privacy Policy.

The company shall carefully analyse the requests, assessing their legitimacy, relevance and responding as set forth in the applicable law.

Applicants can always withdraw their applications within ten business days from the date of submission, in which case all data submitted shall be deleted.

Should the applicants consider that, upon processing of their data, the company is in breach of the legal regime in force, they have the right to submit a complaint to the “Comissão Nacional de Proteção de Dados” (“CNPd”, Portuguese Data Protection Authority), located at Rua de São Bento, 148-3.º, 1200-821 Lisboa (<https://www.cnpd.pt/>), or to another competent control authority pursuant to the law, without prejudice to any other administrative or judicial appeal.

For further information, applicants can contact the Data Protection Officer by email at EPD_A-To-Be@a-to-be.com or by post to the following address Quinta Torre da Aguilha, Edifício Brisa, 2785-599 São Domingos de Rana (Portugal).

8. Alterations to the Privacy Policy

The company reserves the right to, at any moment, change this Personal Data Processing Policy pursuant to any update of its business practices or to comply with legal requirements.