



An Initiative by Orbit360 Series LLC

Candidate Privacy Notice

This privacy notice describes how the Orbita Note Series, a subsidiary of Orbit360 Series LLC (“**Orbita Note Series**”, “**we**” or “**us**”) collects and processes personal information about you, how we use and protect this information, and your rights in relation to this information, when you apply for a job at one of Orbita Note Series locations.

Personal information is information, or a combination of pieces of information, that could identify you.

This privacy notice describes the handling of personal information obtained about job applicants during the recruitment process via one or more of the following means:

- through the Orbita Note Series online recruitment system (the “**recruitment system**”), which links to this privacy notice;
- directly from applicants;
- from third-party agencies and recruiters on behalf of applicants;
- from third-party service providers who perform background checks on our behalf;
- publicly available professional profiles on websites or social media (e.g. LinkedIn); and
- from Orbita Note Series employees who refer a contact for a position.

When you apply, the personal information you submit will be made available to the HR team and potentially to relevant individuals/departments within the Orbita Note Series entity to whom you have applied or made an enquiry.

1. INFORMATION WE COLLECT

This privacy notice applies to all personal information we collect or process about you as an applicant. We collect personal information from you directly and also from other sources as explained in this notice.

We may be required by law or based upon our legitimate interest to collect certain personal information about you for recruitment purposes. Failure to provide this information may result in you not being able to continue as a candidate for the job for which you have applied. The information we collect will vary depending on the country in which you are applying for a job position.

1.1 Information we collect directly from you,

The categories of information that we collect directly from you (subject to applicable law) are:



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- (a) personal details (e.g. name, date of birth);
- (b) work permit or proof of legal status to work (where required);
- (c) contact details (e.g. phone number, email address, postal address or mobile number);
- (d) information contained in your resume or CV, and other documents related to the application or recruitment process (e.g. cover letter, transcripts, certifications);
- (e) educational details (e.g. educational history, qualifications, certifications, skills);
- (f) information about your family and dependents (after an offer of employment has been accepted by you);
- (g) citizenship or immigration information (to determine your eligibility to work in the relevant hiring location); and other information you may choose to submit to us in connection with your application.

1.2 Information we may collect from other sources (subject to applicable law),

The categories of information that we may collect about you from other sources are:

- (a) username and password for the recruitment system;
- (b) background check information from employment screening agencies or publicly available registers (after an offer of employment has been accepted by you), (as allowed by law). We may conduct the following background checks through an employment screening agency when relevant and necessary for a specific job or position and permitted by applicable law:
 - (i) Criminal record check that provides details of unspent convictions and cautions;
 - (ii) Financial integrity checks against county court judgments, bankruptcies and individual voluntary arrangements, decrees and sequestration orders;
 - (iii) Directorship checks for current or previously held directorships or company secretarial positions to check for potential conflicts;
 - (iv) ID document check to verify your identity;
 - (v) Compliance check against a database of public records in the relevant countries to reveal any potential links to money laundering, bribery, terrorism, politically exposed persons, corruption, fraud or miscellaneous risk;
 - (vi) Regulatory checks, where relevant, against registers such as for example, the UK's Financial Conduct Authority's Individual Register and Prohibited Persons Register;
- (c) publicly available professional profiles on websites or social media (e.g. LinkedIn);
- (d) information about your performance or conduct from referees, other Orbita Note Series employees (where relevant), educational institutions (including academic records, qualifications and attendance rates), professional membership bodies and/or clients or service providers you worked with and who may provide feedback about you;
- (e) information about your relationship with previous employers, including prior work



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- experience;
- (f) information about gaps in employment history in the past 5 years; and
- (g) information about any association you may have with any current or former Orbita Note Series employees.

We may also collect information about you using cookies and similar technologies when you use the recruitment system. See our [Privacy Policy](#) for further information.

1.3 Sensitive data,

We may also collect more sensitive information (also known as special category information) about you as necessary and with your consent, or as permitted or required by law after an offer of employment has been accepted by you. This is a category of personal information that has special protection under data protection laws, such as:

- (a) information about race, ethnic origin, religion or sexual orientation for diversity monitoring purposes (for the avoidance of doubt, this will not form part of the selection process and you will not be penalized if you choose not to provide this information);
- (b) photograph, fingerprint or other biometric identifier for identification purposes;
- (c) health or disability information to provide reasonable accommodations/ adjustments (you may also choose to provide such information to us during the recruitment process); and
- (d) criminal background check information for employee vetting purposes (as described in section 1.2 above).
- (e) trade union membership
- (f) banking and financial account, and national identification number in China
- (g) precise location

2. HOW WE USE THIS PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

Subject to applicable law, we use your personal information for the following human resources management purposes::

- (a) manage the recruitment system and applicants;
- (b) assess your skills, qualifications and application against the position applied for or other positions within Orbita Note Series;
- (c) communicate with you in relation to your application and the recruitment process;
- (d) send you information about other positions with Orbita Note Series which may be of interest to you;
- (e) detect, prevent and respond to fraud or potentially illegal activities, misuse of the recruitment system, intellectual property infringement or other violations of law or other



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- Orbita Note Series policies;
- (f) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies; and
- (g) deal with your enquiries and requests.

ORBIT360 will typically use a third-party service provider to verify the personal information you submit in the course of your application, including through reference checks and, where applicable, background checks. Please contact us using the details in section 8 of this notice if you require any further information.

In some countries in which we operate the law requires that we have a legal basis to process your personal information. In most cases under EU and UK privacy laws, for example, the legal basis will be one of the following:

- (a) to fulfil our pre-contractual obligations to you in connection with your seeking of employment with us, and if you are hired, to fulfil our contractual obligations to you in connection with your employment contract with us;
- (b) to comply with our legal obligations, for example, obtaining proof of your right-to-work status to enable us to meet relevant obligations;
- (c) to comply with our legal obligations to you, for example, health and safety obligations that we must comply with, or to a third party (e.g. the taxation authorities);
- (d) to meet our legitimate interests, for example, to conduct our recruitment processes efficiently and fairly, or to manage our employees effectively and protect us against theft or other crime. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms. For more information about the balancing test that we carry out to process your personal information to meet our legitimate interests, please contact us at the details below; or
- (e) to protect your or another person's vital interests, for example by providing your health information to a doctor in a medical emergency.

As required and in accordance with applicable law, we may obtain your explicit consent to collect and use certain types of personal information (for example, when we process some categories of sensitive personal information). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal information where such collection, use and disclosure without consent is permitted or required under applicable laws.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION



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Please let us know if any of the personal information that we hold about you changes so that we can correct and update the information on our systems.

In some countries where Orbita Note Series operates you have certain rights regarding your personal information, subject to applicable law. Depending on where you are located, these may include the rights to:

- access and duplicate your personal information, including information about how your personal data collected by us has been used or disclosed within a year before the date of your request for access;
- rectify, correct, or supplement the information we hold about you;
- erase your personal information;
- restrict our use of your personal information;
- object to our use of your personal information;
- receive your personal information in a usable electronic format and transmit it to a third-party (right to data portability);
- request an explanation of our personal information processing rules; and
- if you are located in Australia, Canada, China, the EU or the UK, lodge a complaint with your local data protection authority or the local data protection authority or the applicable local data protection authority, office, or commissioner in the country where you work, reside, or where the subject-matter of your complaint or concern arises.

We will contact you if we need additional information from you to honor your requests.

If you would like to discuss or exercise any of the above rights, please contact us at privacy@Bta1.net or contact the Data Protection Officer using the details below.

4. AUTOMATED DECISIONS ABOUT YOU

Where we consider it necessary for certain roles, we may process your personal information by automatic means and without human intervention to make decisions or conduct 'profiling' about you (subject to applicable law). This involves using software that is able to evaluate your personal aspects and predict risks or outcomes. For example, we may ask candidates to complete psychometric tests or record videos of themselves answering questions. We carry out this automatic processing to assist us in assessing your eligibility for a role and to compare applicants fairly. The significance of our actions in this context is that depending upon the outcome of the processing you may not be eligible for a particular role. We base our decisions on a range of criteria, including standard and objective test score results.

We will only make these kinds of automated decisions about you where such decisions are required or authorized by law. If you require further information about automated decision-making, want to object to our use of automated decision-making, or request an automated decision to be reviewed by a human being, please contact privacy@Bta1.net and we will explain to you what your rights are in relation to the processing



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in question.

5. INFORMATION SHARING

Subject to applicable law, we may share your personal information with third parties under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform business operations for us. For example, we may partner with other companies to operate our recruitment system, support email and messaging services, perform background checks (as described in section 1.2 above), verify your employment history, education and professional memberships and analyse information to improve performance. We have entered into contractual arrangements that require our third-party service providers to respect our privacy practices and not use your personal information for purposes other than to carry out our instructions or provide services for us. (Please see here for a list of our service providers and business partners whom we may share your personal information with.);
- We work closely with other businesses and companies that fall within the Orbita Note Series group. We may share certain information, such as your job application details with other Orbita Note Series group entities for human resource management and internal reporting purposes;
- Where permitted by law, to protect and defend our rights and property;
- When required to do so by law and/or by public authorities to comply with legal and/or regulatory requirements and cooperate with regulators and law enforcement bodies; and
- with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located. See the section on "Information Transfer" below for more information.

6. INFORMATION SECURITY

We have implemented generally accepted standards of technical and organizational security to protect personal information from loss, misuse, alteration, or destruction. All Orbita Note Series employees are required to keep personal information confidential and only authorized personnel have access to this information.

We will keep your personal information for no longer than is necessary for the specific recruitment period, after which we will typically retain your personal information for a period of time, in accordance with



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applicable law, that enables us to:

- Maintain business records for analysis, understanding market trends and/or audit purposes;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims;
- Ensure fraud detection and prevention;
- For the purposes of referring other Orbita Note Series employment opportunities to you; and
- Deal with any queries or complaints you may have.

We will delete or de-identify your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the information.

7. INFORMATION TRANSFER

Your personal information may be transferred to, stored, and processed in a country other than the one in which you are employed, which may not have the same level of data protection as your home country. These may include India, Ireland, the United States, and the United Kingdom. As such, your personal information may be accessed by the courts, law enforcement and national security authorities of that other country. For the avoidance of doubt, if you are resident in the European Economic Area ("EEA") or the UK this may include the transfer of your personal information from within the EEA or UK to a country outside the EEA or UK.

We have put in place appropriate safeguards, such as standard contractual clauses in accordance with applicable data protection laws as well as technical safeguards in accordance with applicable legal requirements and the recommendations of the European Data Protection Board. For more information on the technical safeguards in place, please visit [Security](#). Where the transfer is from China to a jurisdiction outside of China, the Company will comply with the applicable requirements to ensure that your personal information is adequately protected. Where the transfer of your personal information is from Singapore to a jurisdiction outside of Singapore, we will take steps to ensure that your personal information continues to receive a standard of protection that is at least comparable to that provided under the Personal Data Protection Act 2012 of Singapore ("PDPA").

CONTACT US

If you have questions, complaints, or concerns regarding how your personal information has been used, please contact us at Regulatory-DataProtection@Bta1.net. We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to your local data protection authority.



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8. CHANGES TO THE PRIVACY NOTICE

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time and so recommend that you check the Orbita Note Series website from time to time, as needed.

Updated with effect from 20 March 2024