

Notice on the Privacy of Personal Data for Recruitment in the European Union

The purpose of this personal data privacy notice is to inform you about how your personal data (i.e., information that identifies you directly or indirectly) is processed by Spinnaker Algo Systems LTD (Portugal), Spinnaker Algo Systems LTD (London), Spinnaker FX LTD (London) ("we", "us", "our") when you apply for a job at Spinnaker Algo Systems LTD (Portugal). We are responsible for handling your personal data.

What information do we collect?

We may collect some or all of the following information about you:

- Your name, address, and contact details, including email address and phone number;
- Detailed information about your qualifications, skills, experience, education, and employment history;
- Samples of work products, such as examples of software code or written work;
- Information about your nationality, residency status, or right to work in Portugal (or another relevant jurisdiction);
- Details about your current or expected future remuneration;
- Information about criminal convictions and/or offences, as identified during a personal inquiry; and
- Any other information that you voluntarily provide to us.

Sometimes, we collect personal data about you from third parties.

For example, we may:

- Receive some of the above information from a recruiter;
- Obtain professional references from a former employer or another relevant referee you provide; and
- Engage a background check service provider to conduct employment, credit, and/or criminal background checks.

Why do we process your personal data?

Providing your personal data is necessary for us to:

- (a) Fulfil the legal obligations of Spinnaker Algo Systems LTD (Portugal) (e.g., verifying the eligibility of the selected candidate to work in Portugal or another relevant jurisdiction);
- (b) Take the necessary preparatory steps for Spinnaker Algo Systems LTD (Portugal) to enter into an employment contract with you (if your application is successful); and
- (c) Process your application and consider you for a role at Spinnaker Algo Systems LTD (Portugal) (including communicating with you), administer, manage, and improve our recruitment operations; and if your application is unsuccessful, retain your information to contact you if we identify another role that may be suitable for you in the future.

We carry out these activities in our legitimate interest to manage our recruitment function, identify candidates, and hire employees.

When we conduct background checks, this may involve processing criminal record data. Such data will only be processed with your consent and when specifically authorised or required by law. We will notify you if a criminal background check is required as part of your job application.

Your right to object – Please note that you have the right to object to the processing of your personal data when such processing is carried out based on our legitimate interests. Unless you provide us with explicit consent to do so, we will not use your personal data for purposes unrelated to those mentioned above, such as marketing third-party products. If we are legally or contractually required to process certain personal data and you do not provide it when requested, we may not be able to process your application.

Who has access to your personal data?

In connection with the purposes described above, we may disclose your personal data to:

- Our affiliates, service providers (e.g., IT service providers, background check providers), consultants, and advisors;
- Fraud prevention agencies and law enforcement agencies;
- Courts, regulatory entities (governmental and non-governmental), and ombudsmen;
- Any third party acquiring or interested in acquiring or securing all or part of our assets, shares, partnership interests, and/or member interests; or succeeding us in conducting all or part of our business through merger, acquisition, reorganization, or otherwise; or
- As required or permitted by law, including complying with subpoenas or similar legal processes or government requests; or when we believe in good faith that disclosure is legally required or necessary to protect our rights and property.

Spinnaker Algo Systems LTD (Portugal) may disclose your personal data for the purposes described above to recipients located outside the European Economic Area ("EEA"), including in the UK and United States. These countries may not have data protection laws equivalent to those in the EEA. We will make such transfers as necessary to take certain steps required to consider your job application at Spinnaker Algo Systems LTD (Portugal) and if applicable, for Spinnaker Algo Systems LTD (Portugal) to take steps necessary to enter an employment contract with you.

In some cases, we may transfer candidates' personal data within our group under agreements substantially like EU Standard Contractual Clauses ("Standard Contracts"). You can request more information about international transfers, including a copy of any agreements, by using the contact details below.

How long do we retain your personal data?

We will retain your personal data for prospective recruitment activities, including seeking candidates for job opportunities and organizing events with potential candidates in line with our internal retention procedures. The criteria used to determine retention periods include:

- (i) (i) The period during which personal data is needed for evaluating your application and other recruitment activities;
- (ii) (ii) The type of personal data collected; and
- (iii) (iii) Whether we are subject to a legal or contractual obligation requiring retention of the data (e.g., employment-related retention laws or government orders).

If you would like more information about our retention policies for your personal data, please email privacy@spinnakeralgo.com. If you have submitted a CV but no longer wish to proceed with your application, please email recruiting-inquiries@spinnakeralgo.com.

If your job application is accepted, the personal data collected during recruitment will be transferred into your employee file and retained during your employment. Retention periods for such data will be communicated in a new privacy statement.

Your rights

You have the right to:

- Request access to, rectification of, or deletion of your personal data;
- Obtain restriction of processing or object to processing of your personal data;
- Request that a copy of your personal data be provided to yourself or a third party in digital format; and
- Withdraw consent for processing of your personal data.

We will respond to your request in writing—or orally if requested—as soon as possible and within one month at most after receiving it. In exceptional cases, this period may be extended by up to two months; if so, we will inform you of the reason.

If you wish to exercise any of these rights, please contact us using the details provided below. You also have the right to lodge a complaint regarding the processing of your personal data with your local Data Protection Authority. Contact details for each European authority can be found [here](#).

We periodically review this notice and may modify it. If changes are made, we remain committed to keeping your personal data secure. If substantial changes are made to this notice, we will notify you via our website.

Questions, requests or concerns

All questions, requests or concerns regarding this notice or related processing of your personal data—including all requests detailed in the "Your Rights" section above—should be sent via email to privacy@spinnakeralgo.com.