

## **GUPY PRIVACY POLICY FOR APPLICANTS**

We at **Gupy** have a strong commitment to the protection of privacy and personal data. Therefore, we present this Privacy Policy, which has all the necessary information about your rights and obligations and explains how, why and when we treat your personal data on the Gupy Recruitment and Selection Platform.

### **WHO ARE WE?**

**Gupy** (GUPY TECNOLOGIA EM RECRUTAMENTO LTDA., registered with the CNPJ under n. 23.514.668/0001-52) is the holder of the Recruitment and Selection Platform entitled Gupy (the "Gupy Platform" or "Platform") and acts as controller when processing your personal data. Your data is collected in accordance with this Privacy Policy and in compliance with the relevant data protection laws, especially the General Data Protection Act ("LGPD").

### **WHAT DATA IS COLLECTED?**

**Gupy** handles your data to allow you to (i) participate in the selection process(es) performed by companies that use our platform and (ii) integrate your talent bank(s). We never collect unnecessary personal data from you and we will not treat your information in any way other than as specified in this Policy.

**Registration Data:** To create an account on the platform, we require full name, email, country of origin, CPF and phone number. If you prefer, you can also import some of your data, such as name, e-mail and photo, directly from social networks such as LinkedIn, Indeed and Facebook. This option only occurs if you so choose, and all data collected this way is displayed at the time of selection, according to the information recognized in the specific fields.

**Resume Data:** To build your resume, you will need to enter your educational background, professional history, date of birth, gender, and whether or not you are a person with a disability. If you wish, you can also insert your photo and provide a link to your LinkedIn and Facebook profile.

The information that you are a person with a disability, because it is considered sensitive by the legislation, will be treated only with your consent, which can be withdrawn at any time (as explained below in the item "What are your rights regarding the privacy of your data?").

If you declare yourself as a person with a disability, recruiting companies may request a medical report to validate this information and ensure that selection processes for people with disabilities are fair and that inappropriate applications are quickly identified. This submission, however, is not mandatory and will be done with your consent, which can also be revoked at any time.

**Diversity Data:** If you wish, you can complement your profile with data on your gender identity, sexual orientation, color or race and the treatment pronoun that is most appropriate for you. **This data, which is not mandatory, will be treated only and only with your consent and will not be used as criteria for elimination from the selection processes.** Such information has the purpose of allowing recruiting companies to take affirmative action for the hiring and inclusion of people from diversity groups in the labor market.

**Data for Selection Process:** to carry out the selection process, the recruiting company may request (i) complementary information that it deems necessary for the process; (ii) the recording of a video (to learn more about this step, consult the Platform's Terms of Use); and (iii) that you respond to tests, selected by the recruiting company considering the particularities of the vacancy for which you intend to apply, such as, for example, tests of behavioral factors, integrity, knowledge in Portuguese, English and logical reasoning tests -- such tests are performed by partner companies, responsible for the results, and are only made available and stored by Gupy. The Data for Selection Process is under the responsibility of the recruiting company.

**Navigation data.** Finally, we collect data about your platform navigation, which may involve information about your device, geolocation data, internet application access records (such as IP, date and time), platform usage time, access duration, clicks and search terms.

**Data for identity confirmation:** If you contact us through our support channel to make changes to your registration, change your password, recover your account, request information about selection processes in which you have registered, among others, it will be necessary for you to confirm your identity by sending us a photo of your ID document (RG, CPF, birth certificate, passport, CTPS or other official ID document). The copy of your document will be deleted from our database as soon as your service is completed, or within 72 hours at the latest.

## **HOW IS DATA COLLECTED?**

The data can be collected in the following ways:

- (i) **Personal data entered by you in the Platform:** such data are entered by you in the Platform. You are the only one responsible for providing them, by means of manual typing and your own submission.

- (ii) **Resume Data:** such data can also be entered by you on the Platform or by using the Parse tool, which reads your resume and automatically fills in the data found on it on the Platform.
- (iii) **Navigation data resulting from the ordinary use of the site:** we may collect such data by means of cookies and other similar technologies, during your navigation on the Gupy Platform. To learn more, please see our Cookie Policy.

Companies interested in your profile may also use some of your personal data to invite you, via e-mail, to register on the Gupy Platform and in one of your positions. If you do not express interest in the invitation within 30 (thirty) days, your data will be deleted.

## **ON DATA PROCESSING OF CHILDREN AND ADOLESCENTS**

Gupy treats personal data of people from 14 years old on, considered teenagers by law, for the participation in selective processes of young apprentice vacancies. Such data are treated in the exclusive interest of the adolescent and after own submission.

In this treatment, the need for full protection required by the Child and Adolescent Statute and the Constitution will always be considered, with the objective of promoting the physical, social, moral and psychological development of the adolescent provided by the learning contract.

## **WHAT DO WE USE THE PERSONAL DATA COLLECTED FOR? WHAT IS THE LEGAL BASIS?**

We take your privacy very seriously and will never sell your data.

Your **Registration Data** will be used, based on the legitimate interest of the recruiter company to allow you to create a Gupy account.

Your **Registration Data** and **Resume Data** will be used based on the legitimate interest of the recruiting company to:

- (i) Allow you to participate in selection processes of the recruiting companies as well as to integrate the talent bank of these companies;
- (ii) To allow the recruiting companies to invite candidates previously enrolled in their selection processes, whether these processes are still in progress or not, to participate in the selection processes of other open positions that match your profile and skills, always thinking of the benefit of the candidate and of your interest in being hired;

Your **name, e-mail and telephone number** may be used based on the legitimate interest of the recruiting companies in the following situations:

- (i) To contact you, due to the progress of your selection process, to inform you

of new vacancies that may be of interest to you and for you to contact our support or the recruiting company for questions regarding the process; and

(ii) Allow the recruiting companies to contact you directly by e-mail or whatsapp.

In addition, we will use your **name, email and/or phone number** when it is necessary to contact you based on our legitimate interest to:

(i) Address issues regarding your use of the Platform, such as, but not limited to, access issues and irregularities in your account;

(ii) Invite you to participate in surveys related to platform usability, suggestions for improvement and new product development;

**Health Data and Diversity Data** are collected only for the purpose of bringing together candidates from diversity groups and companies that wish to hire them and is legally based on your consent, which may be revoked at any time.

When the recruiting company is a financial institution or an insurance company, according to legal rules and regulations of the Central Bank of Brazil and Susep - Superintendence of Private Insurance, your data may be consulted for a possible analysis related to illicit practices such as money laundering and terrorism (BACEN Circular 3978 and SUSEP Circular 612/2020).

Finally, the **Navigation Data** are used for:

(i) to guarantee you an experience adequate to your profile and to analyze flaws and errors in our operations by checking our services, aiming at improving our service and our interactions with you;

(ii) operationalize new products and services, monitor the operation of the platform, ensure its security, understand your preferences, and make improvements; and

(iii) comply with legal obligations to keep records of connections and access established by the Internet Civil Framework and legal and administrative obligations in cases of fraud or court order.

In specific situations, we may base data processing on the compliance with legal and regulatory obligations and the regular exercise of rights. For any purpose where your consent must be collected in accordance with the law, the processing of data depends on your free and unambiguous manifestation.

## **WE DO NOT TOLERATE DISCRIMINATION!**

At Gupy, candidates are not unlawfully discriminated against in any way,

regardless of the personal data that the platform collects or uses about them. Final hiring decisions, however, are made by the recruiting company.

## WHAT ARE YOUR RIGHTS REGARDING THE PRIVACY OF YOUR DATA?

Here at Gupy your rights are taken seriously! Your main rights under data protection legislation are:

1. **right of confirmation of treatment:** you can ask Gupy to confirm the treatment of your personal data by opening a ticket through <https://gupy.zendesk.com/hc/pt-br/requests/new>;
2. **right of access:** you can have access to all your data handled by Gupy, by entering your profile and verifying the Registration Data or by accessing the selective processes in which you signed up and verifying the Data for Selection Process. If you have any difficulty or wish to obtain additional information, open a ticket through <https://gupy.zendesk.com/hc/pt-br/requests/new>;
3. **right to correct incomplete, incorrect or outdated data:** if you find that your data is incomplete, inaccurate or outdated, you can correct it directly in your profile or in the selection process registration or, if you have difficulty, open a ticket through <https://gupy.zendesk.com/hc/pt-br/requests/new>;
4. **portability right to another supplier:** you can request the portability of your data, which means that Gupy will give you a copy of your personal data in a common reading format, so that you can use it to fill out the registration request to similar platforms to Gupy. Make the request by opening a ticket through <https://gupy.zendesk.com/hc/pt-br/requests/new>;
5. **right to revoke consent:** if you have given your consent for the processing of your data, notably for the use of the information that you are a person with disability, for the sending of your medical report and for diversity data you may revoke it at any time, in which case Gupy will no longer use such information in the selection process for which it was given and the recruiting company will no longer consider it. Revocation of consent may be made in the following ways: (i) for Health Data and Diversity Data, you can change your answer and/or withdraw your consent to the sharing of Diversity Data; (ii) for the medical report, you can delete the document from your account.. If you have difficulty in this action, open a ticket through <https://gupy.zendesk.com/hc/pt-br/requests/new>;
6. **right to object to the treatment or request deletion of your account:** you may object to the use of your data by requesting deletion

of your account on the Gupy Platform -- which can be done by accessing your profile and clicking the "Delete my account" button. In this case, the process of deleting your account will take place within 10 calendar days, during which time you will not be able to create a new account, in order to avoid fraud. In addition, some of your data may be kept for Gupy's legal or regulatory obligations and to defend the rights of Gupy and its clients in case of legal claims;

7. **right of petition:** you have the right to file a complaint regarding the use of your data with the National Data Protection Authority.

If you have any questions or difficulties that have not been resolved by our support team, you can contact the head of our Data Protection area, **Renata Benjamin** at [privacidade@gupy.com.br](mailto:privacidade@gupy.com.br).

### **WITH WHOM DO WE SHARE THE COLLECTED DATA?**

Your data will be shared only with those who need to receive it in order to enable their participation in the selection process -- that is, with the companies that are conducting such process. In addition to the recruiting company, also a personal data controller, which will always receive your data, they can also conduct the recruitment process HR or people management consultancies, which can (i) open a selection process on behalf of the recruiting company; or (ii) manage a selection process opened by the recruiting company itself. Such companies may communicate directly with you to conduct the selection process, to invite you to apply for other positions and for related topics. The recruiting company, as the controller of your data, may also use your data to (i) conduct recruitment processes outside the Gupy Platform and (ii) share your data with companies belonging to the same economic group. In doing so, the recruiting company shall remain fully responsible for the independent uses it makes of such data.

They may also receive your personal information from service providers (called operators by law) that we have hired to help us perform our activities, whatever they may be:

- Amazon Web Services: Data processing and Cloud Storage
- Primeira Escolha: test provider partner company
- Mindsight: test provider partner company
- Here: geolocation
- MailGun: sending emails
- Zendesk: support
- Infobip: integration for communication with candidates via corporate Whatsapp

Such providers have been carefully selected, have strict confidentiality agreements and obligations related to the protection of your data and may treat your data only and only for the purposes of providing the service contracted by Gupy.

Other specific legal demands may lead to the sharing of personal data, including for the eventual defense of our rights and interests in any kind of conflicts or for the fulfillment of determinations of competent authorities.

## **INFORMATION SECURITY MEASURES**

We act to implement security measures that protect our systems and databases with the best technologies available in the market. Among the security measures we adopt are the use of antivirus, data encryption, anonymization of personal data, information access control, the use of firewalls and the implementation of internal policy of information security, architecture of the software solution with prevention of invasion and use of HTTPS.

However, despite our efforts, considering the nature and architecture of the Internet, which includes elements that are not under our control, it is impossible to guarantee that malicious agents will not be able to access or make improper use of personal data, as this is a risk inherent to the use of computerized systems.

## **WHERE IS YOUR DATA STORED?**

Your data is stored in the cloud by Amazon Web Services, whose server is located in the state of Virginia, in the United States, which will require transfer and/or processing of this data outside Brazil. Amazon maintains technical and organizational security measures in structure and security assurance certifications recognized worldwide, including [ISO/IEC 27001](#), [ISO/IEC 27017](#), [ISO/IEC 27018](#), [PCI DSS Level 1](#) and [SOC 1, 2 and 3](#).

## **INTERNATIONAL TRANSFER OF PERSONAL DATA**

Gupy may transfer your personal data outside Brazil, more specifically to the United States or European Union countries, in case the recruiting company or any of the operating companies have servers in those countries.

Gupy observes all the requirements established by the current legislation and adopts the best security and privacy practices to ensure the integrity and confidentiality of your personal data throughout the procedure. All our relations with such companies are governed by contracts that include data protection and information security obligations appropriate to the nature of the personal data treatment we perform and compatible with the requirements of the Brazilian legislation.

## **HOW LONG WILL WE KEEP YOUR DATA?**

Gupy only stores your personal data for the time necessary to fulfill the purposes for which it was collected.

Since, when you apply for a selection process, you become part of the recruiter company's talent bank, your personal data will be kept even after the selection process is completed. At any time, you may request your exclusion, as indicated in the item above.

If you do not request deletion, but your account remains inactive for a period of one (1) year, we will ask you about your interest in keeping your data on the Platform.

**Important!** The treatment of personal data is an essential condition for you to participate in the selection processes for which you have applied. Should you request the deletion of your personal data, you will immediately lose access to the services of our Platform and will be prevented, for security reasons, from registering again for a period of 10 days. This measure is necessary to avoid fraud in the selection and recruitment processes, as well as to prevent the duplication of registrations of a candidate.

Even after the request for account deletion, some of your data may be kept, in databases located outside the Gupy Platform and protected by appropriate security measures, for the purpose of complying with legal or regulatory obligations or to safeguard the rights of Gupy or third parties, including considering any judicial disputes in which the use of such data may be necessary.

If you experience any difficulty in exercising your rights under this Privacy Policy, please contact our Data Protection department via e-mail: [privacidade@gupy.com.br](mailto:privacidade@gupy.com.br). It will be a pleasure to help!

This Privacy Policy may be updated at any time, and such changes will be published in our services and can be checked whenever you want. Therefore, we recommend that you periodically visit this page to learn about the changes. If relevant changes are made that require further authorization from you, you will be communicated through the platform.

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