HYBRID SOFTWARE GROUP

Candidate Privacy Notice

Recruitment and selection – HYBRID Software Group

This notice explains how the companies of the HYBRID Software Group ("HYBRID", "we") use your personal data when you apply for a job with us, or when we approach you about one. It applies from your first contact with us until your data is deleted or moved to your personnel file. Sections 1 to 12 apply in every country. Section 13 adds the rules that apply in specific countries; where they differ, section 13 prevails for roles in that country.

1. Who is responsible for your data

The controller is the HYBRID company that would employ you. This is the company for the site where the role is based (for example Merelbeke-Melle or Cambourne) or, if the role is not tied to a site, for the country where you would work. The Annex lists the company for each site and country, and we confirm it to you when we first contact you about the role.

Where several HYBRID companies decide together on a recruitment or share the talent pool, they act as joint controllers, and you may exercise your rights against any of them. For any question about this notice, or to exercise your rights, contact terms@hybridsoftware.group.

2. What data we collect and where it comes from

Category	Examples	Source
Identification and contact details	Name, address, email, telephone number	You
Application data	CV, cover letter, diplomas and certificates, work history, language skills, salary expectations, notice period, whether you are allowed to work in the country of the role	You; a recruitment agency that introduced you; a public professional profile (e.g. LinkedIn) if we approached you
Selection data	Interview notes, results of tests, assessments and practical cases	Our interviewers and assessors
Screening data (shortlisted candidates only)	Identity check, verification of diplomas and certificates, references	You; the issuing institutions; the referees you name or approve
Correspondence	Emails, scheduling, feedback	You and us

We ask only for information that is relevant to the job and to your professional abilities. We do not ask about your family situation or plans, health, religion or beliefs, political opinions or trade-union membership, unless you choose to answer a voluntary equal-opportunities survey where local law allows it. Section 13 sets out the specific rules in your country.

We do not request an extract from the criminal record for any role, unless the law of the country of the role requires or allows it for that role. Where local law allows a medical examination during selection, it is carried out only by an occupational or independent physician, only to assess whether you are currently fit for the job, and we receive only the "fit" or "not fit" outcome. If you need adjustments to take part in the selection process, you may tell us; we use that information only to arrange them.

3. Why we use your data and on what legal basis

Purpose	Legal basis (GDPR / UK GDPR)
Assessing your application, organising interviews and tests, communicating with you, making a decision	Art. 6(1)(b) – steps taken at your request before entering into a contract
Pre-employment screening proportionate to the role (section 4), to protect our information systems and the data entrusted to us	Art. 6(1)(f) – our legitimate interest in information security, limited by role so that it does not override your interests
Contacting referees	Art. 6(1)(f) – only referees you have named or approved, after informing you
Defending legal claims, such as a complaint about the selection process	Art. 6(1)(f) – our legitimate interest in establishing, exercising or defending legal claims
Keeping your profile for future vacancies at the HYBRID company responsible for the site or country of the role (talent pool) and, only if you also agree, at other HYBRID companies	Art. 6(1)(a) – your consent, which you may withdraw at any time
Complying with legal obligations, such as social-law or anti-discrimination requirements and right-to-work checks	Art. 6(1)(c) – legal obligation

Outside the EEA and the United Kingdom, these legal bases are replaced by those of local law, as described in section 13.

4. Pre-employment screening

We carry out checks only on shortlisted candidates, and we tell you in advance which checks apply to the role. The scope depends on the role:

Check	All roles	Privileged cloud administrators	Finance and management roles
Identity check (document seen, not copied unless the law requires it)	Yes	Yes	Yes
Verification of CV, diplomas and certificates	Key qualifications	Yes	Yes
References, with your knowledge	Optional	Yes (two)	Yes
Confidentiality and information-security agreement before you start	Yes	Yes	Yes
Criminal-record extract	No	No	Only where local law allows (section 13)

If a check raises a concern, we tell you and give you the chance to explain before we make a decision.

5. Automated decision-making

We do not make recruitment decisions based solely on automated processing, including profiling, within the meaning of Art. 22 GDPR or equivalent local law. A person always reviews your application.

6. Who receives your data

- The HR team and the hiring managers and interviewers involved in your application, on a need-to-know basis.
- Our service providers, acting as processors under a data processing agreement (Art. 28 GDPR or the equivalent local rule): HiBob (HR information system), ZINC (reference and background verification), and our IT and hosting providers.
- A recruitment agency, if it introduced you, for communication about your application.
- Other HYBRID group companies, where the role reports to them or if you agree to be considered for their vacancies (see the Annex).
- Public authorities, where the law requires it.

We do not sell your data and do not use it for marketing or for targeted advertising.

7. International transfers

HYBRID has companies in the countries listed in the Annex, and some service providers are located outside your country. For transfers from the EEA: Transfers to the United Kingdom and to Israel rely on European Commission adequacy decisions. Transfers to the United States rely on the EU–US Data Privacy Framework or on the Commission's Standard Contractual Clauses; transfers to Australia, China and other countries

without an adequacy decision rely on those Standard Contractual Clauses. Transfers from the United Kingdom, Australia and China follow section 13. You can obtain a copy of the relevant safeguards from terms@hybridsoftware.group.

8. How long we keep your data

Situation	Retention period
Your application is unsuccessful	Deleted 12 months after we tell you our decision, so that we can respond to any claim about the selection (6 months in Germany, see section 13)
You join the talent pool	24 months from your consent, or until you withdraw it, whichever is earlier
You are hired	Your application data moves to your personnel file and the employee privacy notice then applies
Screening documents	We keep only a record of each check (date, who performed it, outcome). Underlying documents are deleted once the decision is made; identity documents are not copied unless the law requires it (e.g. UK right-to-work checks)

9. Your rights

Under the GDPR and UK GDPR, you may ask to access your data, correct it, delete it, restrict its use, or receive it in a portable format. You may object at any time to processing based on our legitimate interests, and withdraw your consent where we rely on it. Send your request to terms@hybridsoftware.group. We reply within one month; this period may be extended by two months for complex requests, in which case we tell you why. Outside the EEA and the United Kingdom, your rights and our response times are set out in section 13.

10. Complaints

You may lodge a complaint with the data protection authority of the country where you live or work, or where the issue arose. The authority for each country is listed in section 13. We would appreciate the chance to resolve your concern first.

11. Do you have to provide your data?

No law requires you to apply or to provide your data. We do, however, need the information in section 2 to assess your application. If you decline a check that the role requires, we may be unable to continue with your application.

12. Changes

We may update this notice. The version and date at the bottom of each page show which version applies.

13. Country-specific information

The following rules add to, or replace, sections 1 to 12 for roles in the country concerned.

Country	Additional rules
Belgium	HYBRID Software Development NV, HYBRID Software NV and Conics BV organise recruitment and the talent pool jointly and are joint controllers (Art. 26 GDPR); the essence of their arrangement is available on request. We ask only for information relevant to the job and your professional abilities (Collective Bargaining Agreement No. 38). A medical examination during selection is carried out only by an occupational physician (Act of 28 January 2003). **Authority:** Gegevensbeschermingsautoriteit / Autorité de protection des données, Drukpersstraat 35, 1000 Brussels, www.gegevensbeschermingsautoriteit.be.
France	We collect only information with a direct and necessary link to the job or to assessing your professional abilities, and we tell you in advance which recruitment methods and techniques we use (Labour Code, art. L.1221-6 to L.1221-9). You may give instructions on what should happen to your data after your death (Act No. 78-17 of 6 January 1978, art. 85). **Authority:** Commission nationale de l'informatique et des libertés (CNIL), 3 place de Fontenoy, TSA 80715, 75334 Paris Cedex 07, www.cnil.fr.
Germany	Unsuccessful applications are deleted 6 months after we tell you our decision, in line with the time limits for claims under the General Equal Treatment Act (AGG). Where a works council exists, it receives the application documents it needs to exercise its participation rights in hiring (Works Constitution Act, s. 99). A certificate of good conduct (Führungszeugnis) is requested only where the role justifies it. **Authority:** the authority of the federal state where the company is based; for HYBRID Software GmbH: Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg, Lautenschlagerstraße 20, 70173 Stuttgart, www.baden-wuerttemberg.datenschutz.de.
Spain	Criminal-record data is processed only where a legal provision allows it (Organic Law 3/2018, art. 10). **Authority:** Agencia Española de Protección de Datos (AEPD), C/ Jorge Juan 6, 28001 Madrid, www.aepd.es.
Italy	If you send us your CV on your own initiative, we may assess it without your consent; we give you this notice at our first contact with you (Legislative Decree 196/2003, art. 111-bis). We do not investigate your opinions or facts that are not relevant to your professional aptitude (Law 300/1970, art. 8; Legislative Decree 276/2003, art. 10). **Authority:** Garante per la protezione dei dati personali, Piazza Venezia 11, 00187 Roma, www.garanteprivacy.it.

Country	Additional rules
United Kingdom	The UK GDPR and the Data Protection Act 2018 apply; references to the GDPR mean the UK GDPR. Before you start, we check your right to work in the UK and keep a copy of the documents, as the law requires. The criminal-record check in section 4 is a basic DBS (or Disclosure Scotland) check, carried out under the appropriate policy document required by the Data Protection Act 2018. Transfers from the UK rely on UK adequacy regulations, the UK Extension to the EU–US Data Privacy Framework, or the UK International Data Transfer Agreement or Addendum. **Authority:** please raise any complaint with us first; we acknowledge it within 30 days. Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, www.ico.org.uk.
Australia	The Privacy Act 1988 (Cth) and the Australian Privacy Principles apply instead of the GDPR. We use your information only for the purposes in section 3 and collect sensitive information (such as health information for adjustments, or criminal history) only with your consent. Criminal-history checks are made only with your consent, through an accredited body, and spent convictions are disregarded as the law requires. Your information may be disclosed to HYBRID companies and service providers in the countries listed in the Annex and in Israel. You may request access to and correction of your information; we respond within 30 days. **Authority:** if you are not satisfied with our response to a complaint, Office of the Australian Information Commissioner (OAIC), GPO Box 5288, Sydney NSW 2001, www.oaic.gov.au.
United States	California residents: this notice is our notice at collection under the California Consumer Privacy Act (CCPA). We collect identifiers, professional and employment-related information, education information and sensitive personal information (identity documents for identity checks, and any health information you share for adjustments), for the purposes in section 3 and for the periods in section 8. We use sensitive personal information only for purposes the CCPA permits, and we do not sell or share personal information. You may ask to know, delete or correct your information, without discrimination, at terms@hybridsoftware.group; we respond within 45 days. Background checks through a consumer reporting agency are made only after a separate written disclosure and your written authorisation (Fair Credit Reporting Act). Before any adverse action based on a report, we give you a copy of it and a summary of your rights. Criminal history is considered only as state and local law permits, including fair-chance laws, and we do not ask about your salary history where this is prohibited. **Authority (California):** California Privacy Protection Agency, cppa.ca.gov.
China	The Personal Information Protection Law (PIPL) applies instead of the GDPR. We process your information with your consent, or where necessary to conclude an employment contract with you. We ask for your separate consent before (i) transferring your information outside mainland China to the HYBRID companies listed in the Annex and the service providers in section 6, for the purposes and categories in sections 2 and 3; (ii) processing sensitive personal information, such as your identity-document number or health information; and (iii) providing it to another HYBRID company for its own purposes. You may exercise your rights against those recipients through terms@hybridsoftware.group. In addition to the rights in section 9, you may ask us to explain our processing rules. **Authority:** the authorities responsible for personal information protection, such as the Cyberspace Administration of China, or the courts.

Contact

HYBRID Software Group – Legal and HR
terms@hybridsoftware.group
www.hybridsoftware.com

This privacy notice is also available in Dutch, French, German, Spanish, Italian and Chinese upon request. Where local law requires a version in the local language, that version prevails for roles in that country; otherwise the English text prevails.

Annex – HYBRID Software Group companies (controllers)

Country	Site	Company (full legal name)	Address
Belgium	Merelbeke-Melle	HYBRID Software Development NV	Guldensporenpark 100, Blok K, 9820 Merelbeke-Melle, Belgium
Belgium	Merelbeke-Melle	HYBRID Software NV	Guldensporenpark 100, Blok K, 9820 Merelbeke-Melle, Belgium
Belgium	Ieper	Conics BV	Tiendelaan 5 bus A, 8900 Ieper, Belgium
France	Paris	HYBRID Software France SAS	15 rue Marsollier, 75002 Paris, France
Germany	Freiburg im Breisgau	HYBRID Software GmbH	Uhlandstraße 9, 79102 Freiburg im Breisgau, Germany
Spain	Roquetas de Mar	HYBRID Software Iberia SLU	Pasaje de Austria 3, 04740 Roquetas de Mar (Almería), Spain
Italy	Milano	HYBRID Software Italy SRL	Viale Sondrio 2, 20124 Milano, Italy
United Kingdom	Cambourne	Hybrid Software Helix Ltd	2030 Cambourne Business Park, Cambourne CB23 6DW, United Kingdom
United Kingdom	Harston	Meteor Inkjet Ltd	Harston Mill, Royston Road, Cambridge, CB22 7GG, United Kingdom
United States	Newtown	HYBRID Software Inc.	One South State Street, Newtown, PA 18940, United States
United States	Ann Arbor	Xitron LLC	4750 Venture Drive, Suite 200A, Ann Arbor, MI 48108, United States
Australia	Sydney	HYBRID Software Australia Pty Ltd	Suite 2, Level 14, 9 Castlereagh Street, Sydney NSW 2000, Australia
China	Shanghai	HYBRID Software China Co., Ltd. (上海妙华软件有限公司)	Room 509, 5th Floor, Building A, 900 Yishan Road, Xuhui District, Shanghai, China