JOB APPLICANT AND SUCCESSFUL CANDIDATE PRIVACY NOTICE

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Last update January 2026: This Notice now explains the use of AI-powered tools for interview transcription and summarization based on candidate consent, and clarifies that any AI-assisted features offered through Edpuzzle's applicant tracking system are optional and may be used only in limited circumstances. Please read our Terms of Service and Privacy Policy carefully and reach out to support@edpuzzle.com should you have any questions.

1. OVERVIEW

Edpuzzle Inc. ("Edpuzzle"), and its subsidiaries (collectively, the "Edpuzzle Group," or "we," "us" or "our") collect and process personal data relating to employment candidates as part of our recruitment process subject to this Job Applicant and Successful Candidate Privacy Notice ("Privacy Notice" or "Notice"). This Notice may be updated from time to time to reflect changing legal, regulatory or operational requirements. We encourage you to periodically review this Notice for the latest information on our privacy practices.

If you are a United States ("U.S.") resident, this Notice is supplemented by Section "Additional Privacy Disclosures for U.S. Residents," as applicable.

2. ABOUT THIS NOTICE

At Edpuzzle we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Notice applies to all employment candidates of Edpuzzle and its affiliated companies, and describes the personal information that Edpuzzle collects from or about you, and how we use and to whom we may disclose that information. It is important that you read all of this Notice carefully.

- The term **"Job Applicant"** is used in this Notice to refer to anyone who applies for a job role, who applies for the relevant talent pool, who is considered for a role or for a relevant talent pool, or who otherwise seeks to work with or for us (whether on a permanent or non-permanent basis).

- **"Successful Candidate"** shall mean a Candidate who has passed all stages of our interview process and has received an offer letter from us.

We have appointed a Data Protection Officer ("DPO") to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal information, please contact our DPO, at the following address and contact details:

Av. Pau Casals, 16, Pral. 1-A
08021 Barcelona, Spain
privacy@edpuzzle.com

For data deletion, update, or correction requests please reach out to hr@edpuzzle.com, as outlined in Section "How long does Edpuzzle keep my personal information?" below.

3. COMPLIANCE WITH PRIVACY LAWS AND REGULATIONS

In collecting and processing your personal information, we will comply with the data protection laws and regulations in force at the time. This requires that the personal information we hold about you must be:

- used lawfully, fairly, and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only for as long as necessary for the purposes we have told you about; and
- kept securely.

4. WHAT PERSONAL INFORMATION DOES EDPUZZLE COLLECT ABOUT YOU?

We collect and maintain different types of personal information in respect of those individuals who seek to be employed by us. The information we collect from you helps us manage your recruiting and hiring process, conduct Edpuzzle's business, and comply with Edpuzzle's legal obligations.

We collect and use the following categories of personal data from and about our candidates (some or all may apply to you):

- Identification data (e.g., full name);
- Contact information;
- Place of birth/Nationality;
- Address;
- Gender;
- Marital status;
- Age;
- Data regarding screening questions;
- Previous employment information;
- Education history;
- Referee contacts;
- Data pertaining to work preferences and abilities;
- Resume data;
- Job interview notes;
- Assessment results.
- Recruitment process feedback (which may also be collected anonymously)

We never store or process special categories of data relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation.

Job positions that have direct contact with children or that are aimed at children will be required to provide, prior to joining Edpuzzle, a criminal background check related to children-related sex offenses as per applicable legislation.

5. HOW DOES EDPUZZLE USE THE INFORMATION COLLECTED?

Edpuzzle will only use, and otherwise process, personal information as follows:

- **Job Applicant information:** for recruiting and job placement purposes, such as, but not limited to, including Job Applicants in a database to notify them of future job opportunities or request feedback on our recruitment process to help us better understand it, analyze it and improve it.

  ATS AI-Assisted Interviews (Optional)

  As part of certain interview processes, Edpuzzle may offer candidates the option to participate in an interview that is managed via Edpuzzle's applicant tracking system (ATS) and conducted using videoconferencing or collaboration tools, and that includes optional artificial-intelligence (AI) assisted features supported by the ATS, such as automated recording, transcription and summarization. The service provider that supports these ATS-based AI features is listed in section 7 of this Notice.

  These ATS-based AI features are used solely to generate automated notes or summaries to support our hiring team in documenting and reviewing interviews. **Participation in an ATS AI-assisted interview is entirely voluntary**. Candidates who prefer not to participate may opt for a standard interview without any recording or AI summarization. **Declining to participate will not affect the recruitment process or the outcome of any application**.

  When ATS AI-assisted interviews are offered, Edpuzzle will provide candidates with clear notice and the ability to accept or decline any recording or AI-assisted processing before it takes place. Candidates who consent may withdraw that consent at any time by contacting ht@edpuzzle.com, after which the recording, transcript, and related summary will be deleted in accordance with Section 9.

  Edpuzzle does not use AI systems within its ATS to make automated decisions, scoring, ranking, or evaluations about candidates. All hiring decisions are reviewed and made by human personnel.

  Geographic and regulatory limitation: The availability and use of ATS-based AI-assisted interview features depends on the role, location, and applicable regulatory requirements, and such features may be restricted or disabled in certain jurisdictions, including where specific obligations apply in relation to automated employment decision tools, bias audits, or biometric information.

  Interview transcription and summaries using collaboration tools

In some interviews, Edpuzzle may use AI-powered, manually activated transcription or summarization features available through videoconferencing or collaboration tools (such as Gemini in Google Meet) solely to assist interviewers with note-taking and internal documentation.These tools are **not** used to evaluate, score, rank, or otherwise make decisions about candidates. Use of these tools is optional and subject to prior notice and the candidate's affirmative consent, and candidates may request a standard interview without transcription..

See also Section 11 for details on candidate rights and state-specific privacy regulations.

- **Successful Candidates information:** for on-boarding purposes and background screening, including enrollment in payroll and applicable employee benefit schemes, preparation of employment contract, and other administrative purposes necessary for the Successful Candidate to commence employment with Edpuzzle.

Edpuzzle uses and processes your personal information as per the following legal bases:

- Processing is necessary for the purposes of Edpuzzle's legitimate interests, including those described above, as processing your personal information is necessary to carry out the hiring process and to make it possible for Job Applicants and Successful Candidates to apply for and/or be appointed to a position at Edpuzzle;
- Processing is necessary to comply with Edpuzzle's legal obligations (such as accounting and tax requirements);
- Processing is necessary to take steps at your request prior to entering into an employment contract (e.g. such as drafting an offer letter) and/or perform the employment contract between you and Edpuzzle; and/or
- Carrying out the obligations and exercising rights under applicable employment laws and regulations;

Where applicable, Job Applicants or Successful Candidates may subsequently object to the processing of their personal data at any time by reaching out to us at hr@edpuzzle.com, without affecting the lawfulness of processing prior to such objection.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. In case we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6. WHERE DOES EDPUZZLE OBTAIN THE INFORMATION?

Much of the information we hold has been provided by you, but some may be created in the course of the application process (e.g., during an interview). Additionally, we may collect certain types of personal data about you from third parties, including, but not limited to, recruitment agencies or social media platforms (e.g., LinkedIn).

7. WILL EDPUZZLE SHARE MY PERSONAL INFORMATION?

We may share your personal information with our employees (limited to those who need to know the data for the purposes described in this Privacy Notice), contractors, consultants, employer-of-record and other parties who require such information to assist us with the purposes outlined in previous sections.

We may share personal information with such parties both in and outside of your home jurisdiction, and as result, your personal information may be collected, used, processed, stored or disclosed in a third country.

A list of our third-party providers is attached below:

- Lever for job applications management and recruitment. Lever is our Applicant Tracking System (ATS).
- HelloSign / Adobe for handling electronic signatures of offer letters and employment contracts.
- Asana for handling the Hiring and Onboarding Process.
- EOR New Horizons for handling the Hiring Process.
- EOR Remote for handling the Hiring Process.
- Calendly to schedule calls and meetings
- Google for communication (such as audio and video conferencing through Google Meet), document collaboration, feedback surveys, and other work-related activities. Google's videoconferencing tools may also support manually activated, AI-powered transcription or summarization features used solely for interview note-taking, as described in Section 5.

When we disclose your personal information to these third parties, we will ensure they use your personal information in accordance with our instructions, and we will not authorize them to use or disclose your personal information except as necessary to perform services on our behalf or to comply with applicable legal obligations.

This list may change over time, and we'll work hard to keep it up to date. Disclosure of your personal information to additional third parties or use of it for different purposes than those indicated in this Notice shall only be done after notifying you all necessary information on any key elements affecting the processing of your personal data. You will then have the right to exercise an 'opt out' choice if your personal information is about to be used and/or disclosed in a way that you believe is not consistent with this Notice.

ATS Integrations: Our ATS provides us with the capability to seamlessly integrate with various employment platforms, thus enabling us to share our job posts on those platforms. It is important to be aware that if you choose to apply for a position through any of these platforms, your data will ultimately be stored within our ATS.

8. HOW ARE TRANSFERS OF PERSONAL INFORMATION TO THIRD COUNTRIES SECURED?

8.1 Transfers of personal data outside of the EU / EEA / United Kingdom (UK) / Switzerland (EU / EEA / UK / Swiss individuals only)

Except for transfers of EU/EEA/UK/Swiss data subjects' information to the United States, as explained below, when we transfer your personal information outside of the EU / EEA / UK / Switzerland (whether within our group or to third parties), the transfer will only take place:

a. to countries that the European Commission considers, through an "adequacy decision", have an adequate level of protection;
b. when we provide any of the appropriate safeguards listed under art. 46.2 of Europe's GDPR; or
c. in the absence of "a" or "b" above , we may still transfer your personal information outside of the E.U. / E.E.A. based on any of the derogations (also known as exceptions) for specific situations described under art. 49 of Europe's GDPR.

We maintain appropriate technical and organizational measures to protect the confidentiality of your personal information, including security measures to protect against unlawful or unauthorized processing of personal information, and against the accidental loss of, or damage to, your personal data.

8.2. Transfers of personal data to the United States

Edpuzzle is headquartered and hosted in the U.S., as well as most of our service providers. Hence, personal data we collect from you will be transferred to and processed in the U.S.

- **Transfers EU/EEA - US**: Edpuzzle relies on the EU-US Data Privacy Framework as a legal basis for transfers of personal data from the EU to the US.
- **Transfers UK - US**: Edpuzzle relies on the UK Extension to the EU-US Data Privacy Framework as a legal basis to transfers of personal information from the UK and Gibraltar to the US.
- **Transfers Switzerland-US**: Edpuzzle will rely on the Swiss-US Data Privacy Framework, as a legal basis to transfer personal information from Switzerland to the US once the Adequacy Decision is approved by the Swiss supervisory authority.

For more information, please see below our **Data Privacy Framework Notice**.

8.3. Data Privacy Framework Notice

Edpuzzle, Inc., complies with the EU-US Data Privacy Framework (EU-US DPF), the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework (Swiss-US DPF) as set forth by the US Department of Commerce.

Edpuzzle, Inc., has certified to the US Department of Commerce that it adheres to the EU-US Data Privacy Framework Principles (EU-US DPF Principles) with regard to the processing of

personal data received from the EU in reliance on the EU-US DPF and from the UK and Gibraltar in reliance on the UK Extension to the EU-US DPF.

Edpuzzle, Inc. has certified to the US Department of Commerce that it adheres to the Swiss-US Data Privacy Framework Principles (Swiss-US DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-US DPF. If there is any conflict between the terms in this Privacy Notice and the EU-US DPF Principles and/or the Swiss-US DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

Edpuzzle is responsible for the processing of personal data it receives under the Data Privacy Framework and then transfers it to its third party service providers ("Onward Transfers"). Edpuzzle complies with the Data Privacy Principles for all Onward Transfers of personal data from the EU, UK, and Switzerland, including the Onward Transfer liability provisions.

The Federal Trade Commission has jurisdiction over Edpuzzle's compliance with the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF.

In certain situations, Edpuzzle may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF, Edpuzzle commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF should first contact Edpuzzle at the following addresses:

> EU/Swiss individuals contact our EU representative at the following address:
>
> Av. Pau Casals 16, Pral. 1-A
> 08021 Barcelona, Spain
> privacy@edpuzzle.com
> Attention: Data Protection Officer
>
> UK individuals: contact GDPR Local Ltd., which has been appointed as Edpuzzle's representative in the UK, at the following physical and electronic addresses:
>
> 1st Floor Front Suite 27-29 North Street,
> Brighton England BN1 1EB
> contact@gdprlocal.com
> Attention: Adam Brogden

In compliance with the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF, Edpuzzle commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our

handling of personal data received in reliance on the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF.

Edpuzzle will cooperate and comply with the advice of competent authorities in such cases, and will provide appropriate recourse free of charge.

For complaints regarding DPF compliance not resolved by any of the DPF mechanisms, you have the possibility, under certain conditions, to invoke binding arbitration. Additional information is available on the official DPF website.

9. HOW LONG DOES EDPUZZLE KEEP MY PERSONAL INFORMATION?

If your application for employment is successful and you commence employment with Edpuzzle, your personal data will be maintained consistent with Edpuzzle's Employee Privacy Notice data retention.

If you apply for a job at Edpuzzle and your application is unsuccessful (or you withdraw from the process or decline our offer), Edpuzzle will retain your information for five (5) years after your application. We retain this information for various reasons, including in case we face a legal challenge in respect of a recruitment decision, to consider you for other current or future vacancies at Edpuzzle, and to help us better understand, analyze and improve our recruitment processes.

If you do not want us to retain your information for consideration for other roles, or want us to update it, please contact hr@edpuzzle.com. Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

10. WHAT ARE MY RIGHTS IN RESPECT OF MY PERSONAL INFORMATION?

Your rights relating to your personal information include:

- to be informed about how Edpuzzle uses your personal information;
- to request access to personal information held by Edpuzzle, and to have any incorrect, inaccurate or incomplete personal information rectified;
- where appropriate, to restrict processing concerning you or to object to processing;
- to have personal information erased where there is no compelling reason for its continued processing; and
- where applicable, to portability of personal data, that is to say, to receive your personal information in a structured and commonly used format.

If you wish to exercise your rights regarding personal data please contact hr@edpuzzle.com. We will respond to any requests in accordance with applicable law, and so there may be circumstances where we are not able to meet your request. Alternatively, you may contact Edpuzzle's DPO at the address specified above in section About this Notice.

11. ADDITIONAL PRIVACY DISCLOSURES FOR U.S. RESIDENTS

11.1 ATS AI-assisted interview tools

This section applies only to AI-assisted interview features provided through Edpuzzle's ATS, and does not apply to manually activated transcription or summarization tools used solely for note-taking.

For roles or candidates located in jurisdictions with AI transparency, bias audit, or biometric consent requirements (including the California Consumer Privacy Act/CPRA, the Colorado Privacy Act, the Virginia Consumer Data Protection Act, the Connecticut Data Privacy Act, and the Illinois Biometric Information Privacy Act) Edpuzzle provides notice of its use of AI assisted tools in accordance with applicable law.

Where required by applicable law, Edpuzzle provides appropriate notice and obtains any legally required consent before any audio or video recording or ATS-based AI-assisted processing occurs and honors all applicable rights to access, deletion, correction, and opt-out under the state privacy statutes. Candidates may contact hr@edpuzzle.com or privacy@edpuzzle.com to exercise these rights or request additional information about how Edpuzzle complies with US-state privacy and AI laws.

11.2. California residents - Notice at collection

This Notice at Collection ("Notice at Collection") for California Residents supplements Edpuzzle's Job Applicant and Successful Candidate Privacy Notice and applies to you as a job applicant or successful candidate who resides in the State of California.

Edpuzzle adopts this Notice at Collection to comply with the California Consumer Privacy Act of 2018 (CCPA), as revised by the California Privacy Rights Act (CPRA).

Personal Information Collected

Please refer to the section "WHAT PERSONAL INFORMATION DOES EDPUZZLE COLLECT ABOUT YOU?" for information on the categories of personal data we may collect, store, and process about you.

Sensitive Personal Information Collected

The following Information about you, listed as Sensitive Personal Information in the CCPA, may be collected, stored and processed: social security number, driver's license, state Identification card, and/or passport number.

Purpose/s and use of personal information and sensitive personal information

Please refer to Section "HOW DOES EDPUZZLE USE THE INFORMATION?" in this Notice for information on purposes for which the personal information and sensitive personal information is processed.

Data Sharing

Please refer to Section "WILL EDPUZZLE SHARE MY PERSONAL INFORMATION?" in this Privacy Notice.

Right to Know (Access), Right to Delete and Right to Correct

To exercise the Right to Know (Access), Right to Delete and Right to Correct granted to you by the CCPA, please contact Edpuzzle's Data Protection Officer at the address specified above in section About this Notice. Please note that we may request additional information to verify your identity.

Right to Opt-out of Sale

We do not sell personal information from job applicants or successful candidates.