



POLYGON.IO, INC.

APPLICANT PRIVACY NOTICE

Last Update: January 16, 2024

Polygon.io, Inc. (“**Polygon**”, “**we**”, “**our**”, or “**us**”) respects the privacy rights of all individuals, and we are committed to handling personal data responsibly and in accordance with all applicable laws. To that end, we have created this Applicant Privacy Notice (this “**Notice**”) to provide job applicants and candidates with clear, detailed, and easy-to-read information about how Polygon collects, uses, and discloses personal data during the job application and recruitment process.

This Notice does not cover your interactions with Polygon outside the context of applying for, learning more about, or interviewing for a Polygon position, such as browsing Polygon’s Careers page, checking out our products and services online, or logging into your account as a customer. For information on how we collect and use personal data related to those types of interactions, please see our [Privacy Policy](#).

Our processing of your personal data is in all cases subject to the requirements of applicable local law, internal policy, and where applicable or appropriate, any consultation requirements with worker representatives. To the extent this Notice conflicts with local law in your jurisdictions, local law controls.

1. Personal Data that We Process

We collect, use, and store (collectively “**process**”) different types of personal data about you in the operation of our business. The type of personal data we process is generally limited to what we need to engage with you about Polygon career opportunities, consideration of your application for employment to specific roles at Polygon, including candidate screening, interview scheduling and management, lawful background screening, and to on-board you at Polygon if you receive and accept an offer of employment with us.

The personal data we process can include, but is not limited to, the following:

- **Name and contact data.** Your first and last name, personal email address, home mailing address, phone number, photo, and other similar contact data.
- **Hiring Data.** Information related to your qualifications, past employment or other relevant experiences, interview notes, references, resume or CV, cover letter, immigration status and documentation, residency permits and visas, national ID/passport, job and salary expectations, job preferences, terms relating to compensation and benefits packages, and other documentation in support of authentication or eligibility for employment.
- **Demographic data.** Your gender, gender identity, sexual orientation, religion, marital status, race, ethnicity, whether you are a member of a trade union or a veteran, or have a disability, to the extent you provide us such information. We will only collect and use this personal data in cases where: (i) we have your explicit



consent, (ii) is necessary for legal compliance, (iii) you have manifestly made such information available to us, (iv) it is necessary for reasons of substantial public interest, or (v) it is necessary for the exercise or defense of our legal rights. This personal data will not be used in the hiring decision.

- **Inferences.** We may draw inferences from any of the personal data categories referenced above to create a profile about an applicant reflecting the applicant's characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- **Other Information.** Other information you provide us in the context of job recruiting to administer aspects of your recruitment (or employment) or to comply with legal obligations or Polygon policies. This may include your LinkedIn profile URL, the publicly available sections of your LinkedIn profile URL, if you provide it to us, and other professional websites you provide to us.

2. Purposes for Which Personal Data Is Used

We collect your personal data for the purposes set out below. Failure to provide your personal data when requested may prevent us from being able to carry out these tasks and/or comply with our legal obligations.

- **For the Interview and Recruitment Process.** We collect and use your personal data primarily for the purpose of facilitating the interview/recruitment process and for determining suitability and eligibility for a role. This includes verifying qualifications as well as preparing an offer letter, if your application is successful. It may also include administering background checks and establishing your right to work in a specific jurisdiction. Further, in considering you for opportunities at Polygon, we may consider you for current and future opportunities. We may contact you from time to time, for example, to invite you to events we organize or sponsor, send you alerts or recommendations about opportunities at Polygon, or ask you for updates. You can opt-out of these communications at any time.
- **For our Legitimate Business Purposes.** We also may collect and use your personal data when it is necessary for other legitimate purposes, such as general business management and operations, preparing and performing management reporting and analysis related to recruiting metrics, such as length of the recruiting process, managing and improving our recruitment processes, disclosures for auditing and reporting purposes, internal investigations, management of network and information systems security and business operations, provision and improvement of employee services, physical security and to protect the life and safety of employees and others.
- **For Legally Required Purposes.** We use this information to comply with laws and regulations (e.g. labor and employment laws, health and safety, tax, anti-discrimination laws), or to exercise or defend our legal rights.



- **For Other Purposes.** Where required by law, we will seek your consent to such uses; and where your consent is sought, we will ensure your consent is knowing, truly voluntary, and that you suffer no adverse consequence from any decision to withhold or revoke your consent.

We will only use your personal data for the purposes for which it was collected, unless we reasonably consider that we need it for another purpose that is compatible with the original purpose and there is legal basis for the further processing. For example, relying upon our legitimate interest in recruiting candidates for roles at Polygon, we may process the personal data you provided while researching job openings. However, once you apply for and are successful in obtaining a role, we may process your personal data for the purpose of entering into an employment relationship with you.

3. How and Why We Share Personal Data

Polygon will only share your personal data with those who have a legitimate business need for it. Whenever we permit a third party to access your personal data, we will ensure the personal data is used in a manner consistent with this Notice (and any applicable internal data handling guidelines consistent with the sensitivity and classification of the personal data). Your personal data may be shared with our affiliates and other third parties, including service providers, for the following legitimate purposes:

- In order to carry out the purposes of our personal data processing as described above;
- To enable third parties to provide services on behalf of Polygon;
- To comply with our legal obligations, regulations, or contracts, or to respond to data subject rights, a court order, administrative or judicial process, such as a subpoena, government audit or search warrant;
- In response to lawful requests by public authorities (such as regulatory bodies, law enforcement authorities, and national security organizations);
- To seek legal advice from external lawyers and advice from other professionals such as accountants, management consultants, etc.;
- As necessary to establish, exercise or defend against potential, threatened or actual litigation;
- Where necessary to protect Polygon, your vital interests, such as safety and security, or the vital interests of other persons;
- In connection with the sale, assignment, or other transfer of all or part of our business (such as a potential purchaser and its legal/professional advisers); or
- Otherwise in accordance with your consent.



Please note that where legal requirements limit the sharing of your personal data, Polygon will respect such requirements.

4. Use of Cookies and Web Beacons

Our website may use cookies (small text files placed on your device). Cookies allow us, among other things, to store your preferences and settings; enable you to sign-in; combat fraud; and analyze how our websites and online services are performing.

We also use web beacons to help deliver cookies and gather usage and performance data. Our websites may include web beacons and cookies from third-party service providers.

You have a variety of tools to control cookies, web beacons and similar technologies, including browser controls to block and delete cookies and controls from some third-party analytics service providers to opt out of data collection through web beacons. Your browser and other choices may impact your experiences with our websites and systems.

5. Security of Your Personal Data

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. We also limit access to personal data to those Polygon personnel and other third parties that have a legitimate business need for such access. In addition, we take measures to ensure that third parties that process personal data on our behalf also have appropriate security controls in place.

6. Where We Store and Process Personal Data

Polygon operates globally and therefore personal data may need to be transferred to countries outside of where the personal data was originally collected. For example, because we are headquartered in the United States, personal data collected in other countries is routinely transferred to the United States for processing. When we transfer your personal data to a different country, we will ensure that this transfer complies with applicable laws and legislation.

7. Retention of Data

We will keep your personal data for as long as is needed to carry out the purposes we've described above, or as otherwise required by law. Generally, this means we will keep your personal data until the end of your employment with us, plus a reasonable period of time after that where necessary to respond to any employment inquiries, deal with legal, tax, accounting or administrative matters, or to provide you with ongoing benefits.

8. European Union and United Kingdom

In addition to the information shared in the privacy notice, EU and UK applicants and candidates (including individuals working in the EU and UK, or in some circumstances individuals who normally reside in the EU and UK who are working abroad) may have certain rights under



applicable data protection laws, including the EU and UK General Data Protection Regulation (collectively, the “**GDPR**”) and local laws implementing or supplementing the GDPR, including the rights to:

- Request access to and obtain a copy of your personal data;
- Request rectification (or correction) of inaccurate personal data you have provided;
- Request erasure (or deletion) of personal data that is no longer necessary to fulfill the purposes for which it was collected, or does not need to be retained by Polygon for other legitimate purposes;
- Restrict or object to the processing of your personal data; and
- If applicable, request your personal data be ported (transferred) to another company.

Application of the above rights may vary depending on the type of personal data involved, and Polygon’s particular basis for processing the personal data.

To make a request to exercise one of the above rights, please contact legal@polygon.io. We will consider and act upon any requests in accordance with applicable data protection laws. Please note that we may request certain information from you to enable us to confirm your identity. We may, in limited circumstances, charge you a reasonable fee for administrative costs in relation to responding to your request; however, we will advise you of any fee in advance.

If we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before withdrawal of consent.

EU or UK applicants and candidates (including individuals working in the EU and UK, or individuals who normally reside in the EU and UK who are working abroad) may also direct questions about how we handle personal data to legal@polygon.io.

While we hope we can answer any questions that you may have, if you have unresolved concerns, you also have the right to complain to a relevant data protection supervisory authority in the EU and UK.

The controller of your personal data is Polygon. Any privacy-related queries for your data controller should be directed to legal@polygon.io.

9. California

If you reside in California, this section applies to you and supplements the information shared in the privacy notice.



California residents have specific rights regarding their personal data under the California Privacy Rights Act (“**CPRA**”). This section describes your rights and explains how to exercise those rights. Please note that in the preceding twelve (12) months, we have not sold your personal data or shared such information for cross context behavioral advertising. We may disclose certain personal data, such as your first and last name, employee identification number, email address, bank account details, job title/position, and other similar contact data, financial information, and employment details with our affiliates and other third parties, including service providers who provide services on behalf of Polygon.

- You may request notice of and access to certain information about our collection and use of your personal data over the past 12 months. Once we receive and confirm your verifiable request, we may disclose to you:
 - The categories of personal data we collected about you.
 - The categories of sources for the personal data we collected about you.
 - Our business or commercial purpose for collecting that personal data.
 - The categories of third parties with whom we disclosed that personal data.
 - The specific pieces of personal data we collected about you (also called a data portability request).
 - If we disclosed your personal data for a business purpose, a list of disclosures identifying the personal data categories that each category of recipient obtained.
- You may request that we correct personal data about you that is inaccurate.
- You may request that we delete your personal data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete or de-identify (and direct our service providers to delete or de-identify) your personal data from our records, unless an exception applies.

None of these rights are absolute and there may be circumstances in which we are required or permitted under applicable law not to address your request.

Only you or an authorized agent that you authorize to act on your behalf may make a verifiable request related to your personal data.

Any verifiable request (including those to delete data) must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative



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(such as by requiring you to provide a signed written authorization that the agent is authorized to make a request on your behalf).

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request and confirm the personal data relates to you. Making a verifiable request does not require you to create an account with us. You may exercise your rights under the CPRA by submitting a request to legal@polygon.io.

10. Contact Information & Updates

From time to time, we may update this Notice to reflect changes required by law or our privacy practices or procedures. When we make material changes to this Notice, we'll let you know by updating this Notice and the date at the top of this page. If you have any questions or comments about this Notice and the ways in which Polygon collects and uses your information as described above, please do not hesitate to contact the Support at support@polygon.io.