

Privacy Notice for [EU] Applicants

1. Introduction

Atomwise Inc. (“Company” or “We”) takes its obligations related to the collection, use, transfer and disclosure of the personal information of applicants very seriously and is committed to protecting the privacy of applicants.

The purpose of this Privacy Notice for EU Applicants (“Notice”) is to give applicants who are based in the European Union (including applicants based in the UK after the UK leaves the European Union, “EU Applicants”) information about: what personal information we collect; how we collect, use and disclose that information and the legal grounds for us doing this; and their rights in respect of their personal information.

Atomwise Inc. is the data controller of your personal information and is responsible for how your personal information is processed.

This Notice does not form part of your application or any future contract of employment and may be updated at any time. We will provide you with a revised Notice if we make any substantial updates. It is important you read this Notice, so that you are aware of how and why we are using your personal information.

2. What Information We Collect About EU Applicants

Before, during and after your application to the Company, including time spent on the Careers section of our website (located at <https://www.atomwise.com/careers/>, “Careers Site”) we may collect and process information about EU Applicants. We refer to such information in this Notice as “EU Personal Information.” We collect the following EU Personal Information:

- **Personal Details:** Name, contact details (email, phone number(s), physical address)
- **Talent Management Information:** Details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications and memberships, language and other relevant skills, certification, certification expiration dates)
- **Any other information you provide to us:** such as current salary, desired salary, employment preferences and other information contained in your CV and/or covering letter

We ask that you avoid submitting Sensitive Information, unless such information is legally required and/or the Company requests you to submit such information. Sensitive Information is EU Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data or biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person’s sex life or sexual orientation, and criminal conviction data.

Any information you submit through the Careers Site must be true, complete and not misleading. Submitting inaccurate, incomplete or misleading information may lead to a rejection of your application during the recruitment process or disciplinary action including immediate termination of your employment. In addition, it is your responsibility to ensure that the information you submit does not violate any third party’s rights. If you provide us with personal information of a referee or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

3. Sources of EU Personal Information

We collect EU Personal Information from the following sources:

- **EU Applicants:** in person, online, by telephone, or in written correspondence and forms;
- **Previous employers and other referees:** in the form of employment references;

- **Background and credit check vendors:** as part of the recruitment process;
- **Employment agencies and recruiters;** and
- **Providers of sanctions and “politically exposed persons” screening lists.**

4. How we use and disclose EU Personal Information

Legal Basis for Processing

We will only use EU Personal Information when the law allows us to. Most commonly, we will use your EU Personal Information in the following circumstances:

- where it is necessary in order to take steps at your request prior to entering into an employment contract with you;
- where it is necessary to comply with a legal obligation (including, in respect of Sensitive Information, obligations under employment law) on us; and
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, the Company has a legitimate interest in conducting certain background checks on applicants to ensure that it is offering employment to those individuals whom it considers are most likely to be successful when working for the Company.

We may also use your EU Personal Information in the following situations, which are likely to be rare:

- where it is necessary to protect your (or someone else's) vital interests;
- where it is necessary for us to defend, prosecute or make a claim against you, us or a third party; and
- in the case of Sensitive Information, where you have made the information public.

Purposes of Processing

We process EU Personal Information for the following purposes:

- **Managing Workforce:** Managing recruitment and assessing your suitability, capabilities and qualifications for a job with us, processing your application and performing background checks if we offer you a job, such as credit checks, anti-fraud checks and checks to prevent fraud and money laundering;
- **Communications:** Facilitating communication with you regarding your application;
- **Taking legal action:** Pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, conducting investigations and complying with internal policies and procedures; and
- **Compliance:** Complying with legal (including, in respect of Sensitive Information, obligations under employment law) and other requirements, such as record-keeping and reporting obligations, conducting audits, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas.

We will only use your EU 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. If we need to use your EU Personal Information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

If you fail to provide certain EU Personal Information when requested, we may not be able to review your application, or we may be prevented from complying with our legal obligations.

Disclosures to third parties

We share EU Personal Information with the following unaffiliated third parties:

- **Service Providers:** Companies that provide products and services to the Company such as human resources services, IT systems suppliers and support and background check providers, recruiters and headhunters, and hosting service providers; and
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over the Company such as regulatory authorities, public bodies, and judicial bodies, including to meet national security or law enforcement requirements.

5. Transfer of EU Personal Information

The Company may disclose EU Personal Information throughout the world to fulfil the purposes described above. This may include transferring EU Personal Information to other countries (including countries other than where an EU Applicant is based and located outside the European Economic Area (“EEA”)) that have different data protection regimes and which are not deemed to provide an adequate level of protection for EU Personal Information. To ensure that your EU Personal Information is sufficiently protected when transferred outside the EEA the Company has put in place protective measures.

6. Data Security

The Company will take appropriate measures to protect EU Personal Information that are consistent with applicable privacy and data security laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of EU Personal Information.

Access to EU Personal Information within the Company will be limited to those who have a need to know the information for the purposes described above, and may include personnel in HR, IT, Compliance, Legal, Finance and Accounting. Such personnel will generally have access to EU Applicants’ business contact information such as name, desired position, telephone number, postal address and email address.

The Company has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach of your EU Personal Information where we are legally required to do so.

7. Data Retention

The Company’s retention periods for EU Personal Information are based on business needs and legal requirements. We retain EU Personal Information for as long as is necessary for the processing purpose(s) for which the information was collected, as set out in this Notice, and any other permissible, related purposes. For example, we may retain certain information to comply with regulatory requirements regarding the retention of such data, or in the event a litigation hold is imposed. When EU Personal Information is no longer needed, we securely destroy the data.

8. Data Accuracy

The Company will take reasonable steps to ensure that the EU Personal Information processed is reliable for its intended use and is accurate and complete for carrying out the purposes described in this Notice.

9. Automated Decisions

The Company does not envisage that you will be subject to decisions that will have a significant impact on you based solely on automated decision-making. The Company will notify you in writing if this position changes.

10. Your Rights

You have the right, in certain circumstances, to object to the processing of your EU Personal Information. You can exercise this right by contacting our Privacy Officer at privacy@atomwise.com.

You also have the right, in certain circumstances, to access your EU Personal Information, to correct inaccurate EU Personal Information, to have your EU Personal Information erased, to restrict the

processing of your EU Personal Information, to receive the EU Personal Information you have provided to the Company in a structured, commonly used and machine-readable format for onward transmission, and to object to automated decision-making. If you wish to exercise any of these rights, please contact our Privacy Officer at privacy@atomwise.com. Please note that certain EU Personal Information may be exempt from such access, correction, erasure, restriction and portability requests in accordance with applicable data protection laws or other laws and regulations.

You also can file a complaint with your local data protection supervisory authority. Please contact our Privacy Officer at privacy@atomwise.com for details of the relevant authority.