Privacy Notice for candidates

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This Privacy Notice ("Privacy Notice" or "Notice") is designed to provide you with information on the processing of your personal data when you interact with Toloka group of companies during the recruitment process. The recruitment process includes receiving your resume or similar set of information with your professional background, processing your job application, conducting interview(s) and potentially extending an offer for employment.

Where Toloka uses artificial intelligence ("AI") tools to help review applications, conduct, transcribe or summarize interviews, or assess skills, this notice explains how those tools are used, what human oversight applies, and what rights you have — see Section 4.

This notice is written in English and can be translated into other languages upon your request. Where differences occur between the English version and its translations, the English version shall prevail.

1. Controller

The data controller is the Toloka legal entity to which you are applying for a job, and its affiliated companies, namely:

- Toloka d.o.o. Beograd Starine Novaka 23, 12th floor, Belgrade/Palilula, 11000, Serbia;
- Toloka AI B.V. Claude Debussylaan 7, 1082 MC Amsterdam;
- Toloka Group Inc. 1604 Philadelphia Pike, PMB 117, Wilmington, DE 19809, United States

(hereinafter, each is referred to as “Toloka”). The Toloka entities listed above act as joint controllers of your personal data. The entity to which you are applying is primarily responsible for deciding whether to offer you a role and for the records relating to that decision; Toloka’s other group entities are responsible for operating the shared recruitment systems, technical infrastructure, and AI-assisted tools used during the process (see Section 4). Regardless of this division of responsibility, you may exercise any of the rights described in this Notice, and direct any questions about this arrangement to privacy@toloka.ai.

2. Purposes and legal basis for processing

2.1. Where you apply for a specific role that Toloka has advertised or otherwise made available, for example, through our applicant tracking system, a careers page, or a recruiter, and the role will be in a country where an employment contract is used, Toloka processes your personal data based on the necessity to take steps, at your request, prior to entering into a contract with you. This includes reviewing your application, assessing your qualifications and suitability for the role, and progressing you through the recruitment process.

2.2. Where you submit your personal data to Toloka on your own initiative and not in response to a specific vacancy Toloka has made available, Toloka processes that personal data based on your consent.

2.3. Toloka also processes personal data based on its legitimate interest taking into consideration your reasonable expectations where:

- Toloka directly contacts you in order to discuss potential employment with the use of publicly available contact information;
- you are applying for a role in a country where employment contracts are not used;
- you are referred to Toloka by a third party, for example, an employee referral or a recruitment agency, and have not yourself submitted your personal data to Toloka, in which case Toloka’s legitimate interest is

identifying and evaluating candidates referred through trusted channels; or

- Toloka checks your suitability for a position as part of the conflict and independence check. The legitimate interests of Toloka consist of ensuring effective management of HR relations between Toloka and you, recruitment of qualified employees who have no legal obstacles to work at Toloka and protecting Toloka's statutory rights and interests.

2.4. Once you have entered Toloka's recruitment process, the Toloka entity to which you applied also processes and retains records of your application and the steps taken during that process based on its legal obligation to comply with applicable employment and anti-discrimination laws. Toloka's other group entities process and retain the same records based on Toloka's legitimate interest in being able to demonstrate, across the group, that recruitment decisions were made fairly and lawfully, and in defending itself against any legal claim relating to the recruitment process. This basis applies regardless of which basis under this Section 2 applied to your initial submission, and continues to apply even if you later withdraw a consent given under Section 2.2 (see Section 9).

2.5. Where Toloka uses AI-assisted tools to help evaluate applications, e.g., automated review of CVs against role requirements, AI note-taking and transcription of video interviews, or online technical assessments for certain roles, Section 4 provides more information about these tools and the safeguards that apply.

3. Categories of personal data processed by Toloka

Under this Notice, Toloka may, depending on geography and circumstances, process the following categories of personal data related to you during the recruiting and hiring process:

- Name / surname / maiden name
- Nationality and gender
- Residence permit and work permit (if required)
- Permanent address, city, postal code
- Place of residence
- E-mail address
- Phone number
- Education
- Work experience
- Job title (job requirements)
- Information on wages
- Preferences regarding equipment and operating system
- Any other details contained in your CV or otherwise provided when applying for a job
- Video and/or audio recordings, and the AI-generated evaluation of those recordings, from AI-assisted interviews for roles where this applies (see Section 4)
- Transcripts, notes and AI-generated summaries of your video interviews (see Section 4)
- Results of technical or skills assessments (for example, coding tests) completed as part of your application
- Information required for passing sanctions screening, and conflict and independence checks
- Information collected for identity verification and background checks for successful candidates and contractors — for example, government-issued identification, education and employment verification, and, where legally permitted and with your consent, criminal record information

In addition to the above, Toloka may also process the following categories of personal data related to you during the onboarding process:

- Date of birth
- Birth certificate number (I don't think is really necessary)
- ID card number/ passport number, issuing authority and expiration date

- Information about your pension and other state benefits
- Details of other employment
- Information on health conditions (if required)
- your photo image
- Banking information for payroll
- Dependents
- Emergency contact information

4. Use of artificial intelligence and automated decision-making in recruitment

As part of the recruitment process, Toloka uses artificial intelligence ("AI") tools to help evaluate applications more efficiently and consistently. Specifically:

- CV screening. Toloka uses an AI tool to review your CV and application against the requirements of the role you applied for — such as relevant experience, education, and language proficiency — and to produce a recommendation on whether your application should proceed.
- Technical assessments. For certain roles, your technical or coding skills may be assessed using an online assessment tool; results are reviewed by a member of our recruitment team.
- Interview notes and transcripts. When we interview you by video call, the interviewer may use an AI note-taking tool (currently Gemini, provided by Google) to transcribe the call and summarize it. We use the transcript and notes only to evaluate your application, and they are kept with your application record. These tools do not make hiring decisions. We tell you about this in your interview invitation before the interview. If you would prefer that we not use AI note-taking for your interview, tell us before the interview and the interviewer will take notes by hand.

Human oversight and your rights. Toloka's recruitment team monitors and reviews these AI-assisted outcomes on an ongoing basis. Regardless of the outcome, you have the right to:

- request a human review of a decision made about your application;
- object to the use of automated processing in your case; and
- request more information about how a tool works and what it evaluates.

Recording by candidates. To protect candidates, interviewers and confidential information, we ask that you do not record, screenshot or otherwise capture interviews or task materials, and that you do not share them. If you need recording or captioning as an accommodation, contact your recruiter before the interview and we will arrange it.

5. Recipients of Personal Data

Toloka discloses your certain personal data to the following recipients to the extent permitted by applicable law and/or based on their legitimate and reasonable requests:

- Affiliate entities that are a part of the Toloka group of companies
- Legal, tax and other advisors providing respective services on HR-related matters, conducting audits
- Providers of our applicant tracking system
- Providers of the AI-assisted screening, note-taking and transcription, and technical-assessment tools described in Section 4
- Partners providing background checks services to Toloka in order to verify information provided by job candidates
- Notaries for drafting powers of attorneys and executing other legal documents
- Relocation agencies for providing relocation services
- Travel agencies, hotels, and carriers for purchasing and booking air tickets, railway tickets, hotels, transfers

- Companies providing technical support to Toloka
- Companies ensuring security and carrying out internal investigations
- Various state and municipal authorities if strictly required to respond to their legitimate formal inquiries
- Other third parties when it is required for compliance with applicable laws or achievement of purposes declared under this notice.

6. Transfers to other countries

Toloka transfers your personal data to countries where its affiliated entities and partners are located, including USA, Netherlands and other EU countries, and Serbia.

For the transfer of your personal data to other countries Toloka uses different tools to make sure the personal data transfer complies with applicable law, and to help to give your personal data the same level of protection as it has in the European Union.

Toloka uses the Standard Contractual Clauses to provide for an equivalent level of protection for the transfers from the EU or Serbia to countries without an adequacy decision. You can obtain more information about these transfer mechanisms, including a copy of the relevant Standard Contractual Clauses, by contacting us using the details in Section 1.

For personal data transferred to the United States specifically, Toloka's Standard Contractual Clauses are supplemented by a transfer risk assessment that takes into account the framework of safeguards introduced by U.S. Executive Order 14086 on Enhancing Safeguards for United States Signals

7. Storage periods

Toloka retains your application and recruitment-related personal data for up to 2 years from the date of your last activity in the recruitment process (for example, the date your application is closed), after which it is deleted or anonymized, unless a longer period is required to comply with a legal obligation, to establish, exercise, or defend legal claims, or because you have separately consented to a longer retention period so that Toloka can consider you for future roles. Interview transcripts and notes are kept with your application record and are deleted on the same schedule.

8. Basic rights of Data Subjects

You have the following rights, subject to legal restrictions. To exercise them, contact Toloka using the details in Section 1. We may ask you to submit your request in writing and to verify your identity before processing it, and we may decline requests where permitted by law.

- Access — ask us to confirm whether we hold your data and receive a copy of it.
- Rectification — ask us to correct or complete inaccurate or incomplete data.
- Erasure ("right to be forgotten") — ask us to delete your data where it is no longer needed, processed unlawfully, or where you have withdrawn consent and no other legal basis applies.
- Restriction on processing — ask us to pause processing while a request is disputed, when processing is unlawful but you prefer restriction over deletion, or while an objection is considered.
- Objection to processing — object to processing based on legitimate interests (including direct marketing). We will stop unless we have compelling legitimate grounds that override your interests.
- Data portability — where processing is based on your consent or a contract with you and the data collection and format is applicable, receive your personal data in a structured, commonly used, machine-readable format, and ask us to transmit it directly to another controller where technically feasible.
- Withdraw consent — where processing is based on consent or explicit consent, withdraw it at any time without affecting the lawfulness of prior processing.

To exercise your rights, you can contact Toloka by using the contact details specified in section 1 of this Privacy Notice. Toloka may ask you to specify your request in writing and to verify your identity before

processing the request. These rights are not absolute, and Toloka may also decline to fulfil your request on grounds set out in applicable data protection legislation.

9. Withdrawal of consent

Where processing is based on consent, you have the right to withdraw consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal. To withdraw consent, you can contact Toloka by using the contact details specified in section 1 of this Privacy Notice.

10. Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the supervisory authority, in particular in the member state of the European Union of your habitual residence or, respectively, place of an alleged infringement of applicable law.

11. Sources of personal data

Toloka collects personal data from you directly. However, in certain cases, it also acquires personal data from publicly available registers and databases, state authorities, recruitment agencies, professional networking platforms, employee referrals, or former employers of the data subject.

12. Additional disclosures for U.S. applicants

12.1 California. If you are a California resident, the California Consumer Privacy Act (as amended) gives you rights in addition to those in Section 8, including the right to know the categories and specific pieces of personal information Toloka has collected about you, the right to delete personal information (subject to certain exceptions), the right to correct inaccurate personal information, and the right to limit the use of “sensitive personal information” (which, in the recruitment context, may include copies of government-issued identification and, where applicable, information about racial or ethnic origin collected for legally required reporting). Toloka does not sell or share (as those terms are defined under California law) your personal information. To exercise these rights, contact us using the details in Section 1. you will not be discriminated against for exercising these rights.

13. Necessity to provide personal data

There are no general statutory or contractual requirements for you to provide Toloka with the personal data described in this Notice. However, if you do not provide the personal data needed for a particular stage of the recruitment process, for example, information needed for an identity or background check, or to complete a required technical assessment, Toloka may be unable to adequately evaluate your application or progress it further. Where any such requirement is mandatory in your country of residence, Toloka will inform you.

14. Changes to this notice

Toloka may change this Notice from time to time at its sole discretion. You are encouraged to check this page periodically for updates.

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