



## **Privacy Notice for Employment Candidates**

Last updated: July 2025

This Privacy Notice applies to candidates who apply for a job at Ava Financial Ltd., Ava Trade EU Limited, or another company in the Ava group, and describes how such company, its parent company, subsidiaries, and affiliated companies (collectively, “Ava,” “we,” “us,” and “our”) collect and use information about you during the application and recruitment process.

### **1. Information Collected**

This Privacy Notice covers the information you share with Ava during the application and recruitment process, including your contact information (name, email address, phone number), identification number, address and location information, curriculum vitae/resumé (including skills, work experience, education), job application materials and notes, LinkedIn and other online professional profiles, position(s) for which you are being considered, source of your candidacy (e.g., recruiting agency, referral), communications regarding your candidacy, reference information, responses to questionnaires, availability for employment, salary expectations, evaluations of your candidacy, internal discussions about your candidacy, information received from background checks (where applicable), information provided by third parties, information from publicly available sources, and all other information you choose to share with Ava.

We do not intend to collect information about minors. If you are aware or have reason to suspect that such information was unintentionally collected by us, please report to us immediately.

### **2. Purposes of Collection and Use**

Your information will be used by Ava for its legitimate business interests in processing your application and recruitment process, including evaluating and considering you as a candidate for positions in accordance with our processes and policies for evaluating employment candidates, contacting you regarding your candidacy status and interviews, and scheduling meetings and interviews. If you are not successful in the recruitment process, we may retain the information collected during the application and recruitment process so we can reach out to you if other positions that match your skill set become available. Your information will also be used by Ava for the process of entering into an employment contract with you and as part of your onboarding process. Ava will not use your information for marketing purposes.

Our legal bases for processing your information are: (a) you gave us your consent to the processing of your information (for one or more purposes); (b) processing is necessary for compliance with a legal obligation to which we are subject; and, if applicable, (c) processing is necessary for the performance of a contract to which

you are a party or in order to take steps at your request prior to entering into a contract.

### **3. Sharing and Transfer of Information**

Ava may share some or all of your information with the following parties:

1. Service providers and vendors who assist us in collecting, processing, and storing your information in the context of your candidacy, for example, Comeet which provides a recruiting and applicant tracking platform. These service providers are authorized to collect, process and use your information as necessary to provide us services or as otherwise authorized by us. Comeet's privacy policy is available [here](#).
2. Within the Ava group of companies, including parent company, subsidiaries, affiliated companies, and business units.
3. If your candidacy was submitted to us by a third party (e.g. an employee of Ava or a recruiting agency), we may share your general recruitment status with such party for the purpose of operating incentive programs (e.g. employee referral bonus programs) and/or providing feedback to third parties who submit candidates to us regarding their submissions.
4. If we are required to disclose your information by a judicial, governmental, and/or regulatory authority to comply with: a court order, applicable laws and regulations, requests of law enforcement, regulatory, or other governmental agencies.
5. Third parties in connection with a merger, acquisition, or sale of all or substantially all of Ava's share capital, assets, or a certain business activity.
6. If Ava deems it necessary to protect the safety or rights of Ava or any third party or to prevent an unlawful action.

If we need to transfer your information to any of the aforementioned parties which are located outside of your country of residence, or if they need to transfer your information to third parties which are located outside of your country of residence, we will do so, and require the aforementioned parties to do so, lawfully and in accordance with the legal mechanisms applicable to such transfer.

### **4. Security and Retention of information**

We implement commercially reasonable security measures (applying physical, electronic and procedural safeguards) to maintain the confidentiality of your information and protect it against loss, misuse, and alteration. We allow only authorized personnel to access your information, on a need-to-know basis. However, regardless of our efforts and the measures we implement, we cannot and do not guarantee the security of your information and you provide it to us at your own risk.

Ava will retain your information during the recruitment process. After the recruitment process concludes, Ava will continue to retain your information for the following purposes: to consider you for future recruitment opportunities; to identify you if you apply again for a position at Ava; to identify you if your details are provided to Ava by

a third party (such as a recruitment agency); and to protect Ava's interests in the event of a dispute or legal proceeding of any kind involving you.

If you would like to opt out of Ava's policy of retaining your information for consideration for other suitable positions, please contact us using the contact details set forth below.

## **5. Your rights**

You may have certain rights in relation to your information under data protection laws applicable to you. These may include the right to withdraw your consent, if processing is based on your consent, the right to request access to your information, that it be deleted, that its processing be restricted, or that any inaccurate information be rectified. You may also have the right to object to certain uses of your information, and to obtain a copy of your information. You may also have the right to lodge a complaint with the data protection regulator in your country. If you would like to exercise any of your rights, you may contact us using the contact details set forth below.

## **6. Updates**

We may update this Privacy Notice from time to time as required by applicable law or to reflect changes in our information collection, use, and retention practices. Such updated Privacy Notice will be effective as of the "Last Updated" date above and apply to all information that we have about you.

## **7. Contacting us**

If you have any questions about this Privacy Notice or wish to exercise any of your rights, please contact us at [HR@avatrade.com](mailto:HR@avatrade.com).