

California Privacy Rights Act (CPRA) Applicant Information Security Policy

PURPOSE

As an employer, Lyniate must comply with data protection and privacy laws when processing information about our applicants. This policy explains how Lyniate processes applicant personal information and describes the rights employees have in relation to this. It also describes the obligations of applicants in relation to their own personal information.

WHO IS MANAGING MY PII?

The personally identifiable information ("PII") Lyniate holds about you is managed by InterOperability Bidco, Inc., d.b.a. "Lyniate", with the assistance of different regional affiliate companies depending on the country you reside in. The Chief Legal & Compliance Officer is responsible for ensuring Lyniate manages your PII in accordance with applicable laws.

WHAT PII DOES LYNIATE HOLD ABOUT ME AND FOR WHAT PURPOSES IS IT USED?

Lyniate creates, maintains, and uses the following types of applicant records containing PII, in order to fulfill our obligations to you and comply with applicable laws:

Recruitment Records

During the recruitment process, Lyniate collects and creates documents relating to your recruitment, such as your resume/CV, application form, application letters, references, and interview notes. These documents and records may be put in your applicant file and might be used for a variety of purposes including obtaining your contact details.

WHO HAS ACCESS TO MY PII?

Staff across various Lyniate affiliate companies may access your PII to the extent necessary to perform necessary recruitment activities.

Lyniate may transfer your PII outside of the country you reside in, to the extent necessary to perform business functions, including to any of Lyniate's affiliate companies or to third-party suppliers. Lyniate ensures that there are adequate privacy and security arrangements in place wherever your PII is accessed by way of privacy and security obligations in inter-company agreements and agreements with third parties.

RETENTION

Lyniate keeps your PII in accordance with Lyniate's Data Retention Policy and Event Logging Policy.

YOUR RIGHTS

You have rights under applicable laws to access PII the company holds about you, and have it corrected where necessary, subject to some exceptions. Depending on the country you reside in, you may also have rights to access your PII in a portable, electronic format, a right to have your PII erased, a right to know the third parties with whom your PII has been shared with and/or a right to object to Lyniate processing your PII, in certain limited circumstances. Formal requests of this nature should be made to the People Team by emailing people@lyniate.com. You also have rights, under applicable laws, to lodge

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a complaint with the relevant data protection or privacy authorities if you believe Lyniate is not handling your PII in accordance with the law, and you may have rights to compensation in this case.

POLICY WAIVERS

It is understood that in some instances a waiver is necessary to allow the business to function within the bounds of regulatory and legislative parameters. Lyniate appreciates the need for these waivers and require written approval from the Chief Legal & Compliance Officer in order to allow any deviation from this policy. The waiver request must detail the business reason and impact to the business. The waiver must be obtained prior to any non-compliance with this policy. You can contact the Chief Legal & Compliance Officer by sending an email to legal@Lyniate.com.