

Recruitment Privacy and AI Notice

1. Introduction

Leads.io Benelux B.V. and its affiliates (“Leads.io” “we”, “us”) are committed to protecting your personal data (“Data”).

This Recruitment Privacy Notice (“Privacy Notice”), together with any other documents referred to herein, sets out the basis on which the Data will be processed by us in connection with our recruitment procedures and, where applicable, in accordance with:

- The EU General Data Protection Regulation (“GDPR”) and local data protection laws,
- The UK GDPR and the UK Data Protection Act 2019,
- Canada’s Personal Information Protection and Electronic Documents Act (“PIPEDA”), or
- Morocco’s law No. 09-08 relating to the protection of individuals with respect to the processing of personal data.

We also outline the use of AI technologies in compliance with the EU AI Act and associated transparency obligations.

Where you apply for a job opening posted by us, these Privacy Notice provisions will apply to our processing of your Data in addition to our other privacy notice which may have been provided to you separately or is available on our general website.

Please read the following carefully to understand our practices regarding your Data and the use of AI.

2. Data Controller

For all processing activities mentioned here, **Leads.io Benelux B.V.** located at Nieuwe Steen 27, 1625 HV Hoorn, the Netherlands (Chamber of Commerce 58379754) is data controller. This is where our Human Resources department is centrally located, and main decisions are taken.

Leads.io has appointed a **data protection officer (DPO)** that you can contact at compliance@leads.io.

2.1 Workable and use of AI

We use **Workable**, an online application tool (recruitment platform) provided by Workable Software Limited, to assist with our recruitment process. You can find their privacy policy [here](#). We use Workable to process Data as a **data processor on our behalf**. Workable is only entitled to process your Data in accordance with our instructions and based on a data processing agreement (“DPA”).

Workable’s recruitment platform supports us also through various AI-powered functionalities. Here, Workable works as “AI provider” and Leads.io as “AI deployer” (user) of AI systems in line

with the EU AI Act. The following AI tools with Workable are used and may affect applicants:

- **AI in Job Creation:** Generates job descriptions.
- **AI Candidate-Sourcing:** Auto-selects applicants based on AI matching logic.
- **AI Candidate Screening:** Shortlists, evaluates and ranks candidates.
- **AI in Interviews:** Generates and analyzes questions and transcribes video interviews.
- **Salary Estimator AI:** Offers benchmarking insights based on aggregated data.

You can find more information [here](#).

These systems may influence the recruitment process, although the final decision is made by human staff.

Applicants are hereby informed that:

- Their application may be subject to processing by AI systems.
- These systems assist but do not autonomously decide on hiring.
- These systems are intended to support a recruitment process that is efficient, fair, and tailored to the role-specific requirements.

2.2. Partners

Where you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your Data and may also collect information from us in respect of the progress of your application. Any use by the Partner of your Data will be in accordance with the partner's privacy notice.

3. Your Data

3.1. Data we collect from you

We process some or all of the following types of Data from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, we process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills and experience that you provide to us, as well as your video in case you conduct your interview using the "Video Interview Feature".
- If you contact us, we may keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.
- Your video interview in case your interview was performed through the Video Interview Feature.
- details of your visits to Workable's website including, but not limited, to traffic data,

location data, weblogs or other communication data, the site that referred you to Workable's website and the resources that they access.

3.2. Data we collect from other sources

Workable provides us with the facility to link the Data you provide to us, with other publicly available information about you that you have published on the Internet. This may include sources such as LinkedIn.

Workable's technology allows us to search various databases (some publicly available and others not) which may include your Data (include your CV or resume), to find possible candidates to fill our job openings. Where we find you in this way we will obtain your Data from these sources.

We may receive your Data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

4. Uses made of your Data

4.1. Lawful basis for processing

We process your Data based on a lawful basis:

- **EU and UK:** We rely on legitimate interest including in optimizing and standardizing recruitment outcomes through responsible AI deployment balanced with appropriate safeguards and transparency obligations. Our legitimate interests are the recruitment of staff for our business.
- **Canada:** We rely on consent (PIPEDA Principle 3), implied via application submission.
- **Morocco:** We rely on consent and legal obligation per Law No. 09-08, implied via application submission.

4.2 Purposes of processing

We use Data held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings.

- To help our service providers (such as Workable and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve and develop their services.

5. Automated decision making/profiling

Although some automated processes (e.g. AI screening for example by scoring, ranking and categorizing candidates) are used, no solely automated decisions are made. Humans retain final responsibility.

To ensure transparency, we inform you that the AI systems used in our recruitment process apply matching algorithms, keyword analysis, and model-based scoring to evaluate application content and candidate fit. These tools support our HR team in prioritizing candidates based on job relevance and role-specific criteria. More information about the logic, function, and limitations of these tools is available through our AI service provider, Workable.

For specific privacy and AI rights, please have a look at Section 8.

6. Disclosure of your Data

Depending on your location and the specific job you apply for, we may share your Data with the responsible Leads.io group entity (affiliates) or hiring decision-makers in the relevant country or office where the position is based. This ensures that **local recruitment teams** can assess your application in context and manage the hiring process effectively. Such transfers are limited to what is necessary and conducted in accordance with applicable data protection laws.

We pass your Data to our **third-party service providers**, including Workable, who use it only in accordance with our instructions and as otherwise required by law.

Where you have applied for a job opening through the “**Indeed Apply**” functionality, we will disclose to Indeed certain Data that we hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that we hold about you, such as your name, contact details and other Data involving analysis of data relating to you as an applicant for employment (collectively “Application Status Data”). Indeed's privacy notice in respect of Indeed's use of the Application Status Data is available on Indeed's website or [here](#).

Where you have applied to a job opening through another service provider, we may disclose data similar to the Application Status Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by us.

7. How we store your Data

7.1 Security

We take appropriate technical and organizational measures to ensure that all Data is kept secure to prevent Data from being accidentally lost or used or accessed in an unauthorized way. We limit access to your Data to those who have a genuine business need to know it. Those processing your Data will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data breach. We will notify you and any applicable regulator of a suspected data breach where we are legally required to do so.

7.2. Where we store your Data

Where we store your Data in our **own Leads.io systems**, it is stored in the EU on Google cloud servers. For Moroccan or Canadian applicants this means that their Data gets transferred to our headquarters in the EU where not only our servers but also our HR department is located. Please note that we have international data transfer agreements within our group companies in place that make sure that all our offices apply appropriate safeguards.

The Data that we process **using Workable's Services** may be transferred to, and stored at, a destination outside the United Kingdom ("UK") or the European Economic Area ("EEA") for the provision of services. In particular, your Data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the UK and EEA. Appropriate safeguards have been implemented between Workable and its overseas group companies, and between Workable and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

By submitting your Data, you agree to this transfer, storing or processing.

If you would like further information, please contact us (see 'Contact' below).

7.3. How long we keep your Data

We will store all the Data for 12 months subject to local legislative requirements.

Your Data will be deleted earlier on one of the following occurrences:

- deletion of your Data by you (or by another person engaged by you); or
- receipt of a written request by you (or another person engaged by you) to us.

8. Your Rights

8.1 Privacy Rights

Subject to local data protection laws and in particular under the GDPR and the UK GDPR, you have a number of important rights free of charge. In summary, those include rights to:

- **access to your Data** and to certain other supplementary information that this Privacy Notice is already designed to address.
- require us to **correct any mistakes** in your Data which we hold.
- require the **erasure of Data** concerning you in certain situations.
- **receive the Data** concerning you which you have provided to us, **in a structured, commonly used and machine-readable format** and have the right to transmit those data to a third party in certain situations.
- **object at any time to processing of Data** concerning you, for example, for direct marketing.
- **object to decisions being taken by automated** means which produce legal effects concerning you or similarly significantly affect you.
- otherwise **restrict our processing** of your Data in certain circumstances.
- **claim compensation** for damages caused by our breach of any data protection laws.

8.2 AI Rights

As a natural person subject to AI systems during recruitment, the EU AI Act, where applicable, grants you the following specific rights and protections in addition to your general data protection rights:

- **Right to be informed:** You have the right to: (i) Know that AI systems are being used in the recruitment process; (ii) Understand the purpose and function of these systems; (iii) Be informed about the type of decisions the AI systems assist with (e.g. shortlisting).
- **Right to human oversight:** You have the right request a review by a human where a decision has been influenced by AI. We ensure that (i) All AI outputs are reviewed by trained HR professionals; (ii) You may request clarification on how an AI-influenced decision was reached, (iii) Correction of potential inaccuracies or biases in automated processing.
- **Right to object to AI processing:** Where legally applicable, you can object to the use of AI in your recruitment process, and we will offer alternative evaluation path where feasible.

8.3 Exercise of Rights

If you would like to exercise any of those rights, please:

- contact us using our contact details below,
- let us have enough information to identify you,
- let us have proof of your identity and address, and
- let us know the information to which your request relates.

8.4 How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

Privacy laws also give your right to lodge a complaint with a supervisory authority, in particular where you work, normally live or where any alleged infringement occurred.

If you believe your rights are infringed:

- **EU/ EEA:** Contact your local data protection authority (EDPB List).
- **UK:** Information Commissioner's Officer (ICO).
- **Canada:** Office of the Privacy Commissioner of Canada (Priv GC).
- **Morocco:** Commission Nationale de contrôle de la protection des Données à caractère Personnel (CNDP).

9. Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to info@leads.io or compliance@leads.io.

May 2025