

Our Privacy Policy

Your privacy is of utmost importance to us. This Privacy Policy outlines how we collect, use, and protect your personal information when you register and apply for jobs through our candidate portal. By using this portal, you consent to the practices described in this policy includes those who work on a non-permanent basis, including contingent workers, temporary workers, and interns.

1. **Types of data we collect related to job position-** In the course of your employment, or when making an application for employment, we may process Job Data about you and your dependents, beneficiaries, and other individuals whose Personal Information has been provided to us by you. We use the term “Personal Information” (also called “personal information” or “personally identifiable information” in the laws of some jurisdictions) to refer to information that reasonably identifies, relates to, describes, or can be associated with you. Data that has been de-identified, anonymized, or aggregated, or that otherwise cannot reasonably be related back to a specific person is not considered Personal Information. The precise definition of Personal Information may vary depending on your state, province, or country of residence, but we take the same approach to protecting your privacy. The types of Job Data we may process include, but are not limited to:
 - a. **Personal Identification Information:** such as your name, social security number, gender, photograph, date of birth, employee or staff member IDs, Willingness to Relocate, Willingness to Travel, Preferred State/Territories, Language Proficiency, Security clearance (if any), Shift Preference etc.
 - b. **Contact details:** such as address, email ID's, cell phone/telephone number, emergency contact details etc.
 - c. **Employment details:** such as job title and work location, employment contract tenure, performance and disciplinary records, grievance procedures, sickness/time-off records.
 - d. **Background information:** such as academic/professional qualifications, education, CV/resume, criminal records data (for vetting purposes, where permissible and in accordance with applicable law).
 - e. **Government identifiers:** such as government issued ID/passport, immigration/visa status, or national insurance numbers.
 - f. **Information on your spouse/partner and/or dependents:** such as your marital status, identification and contact data about them and information relevant to any of our benefits extended to such people.
 - g. **Financial information:** such as your bank details, tax information, with holdings, salary, benefits, expenses, company allowances, stock and equity grants.
 - h. **Application Data:** Job application details, interview notes, assessments, and any other information you provide during the application process.
 - i. **Information technology information:** Such as information required to provide access to company IT systems and networks (and information collected by/through those systems) such as IP addresses, log files and login information. We may also process some sensitive personal information relating to you (and your spouse/partner and/or dependents), this sensitive personal information may include any information that reveals your racial or ethnic origin, religious, political, or philosophical beliefs, sexual orientation, trade union membership, criminal convictions, genetic data, biometric data for the purposes of unique identification, information about your health. In the United States, sensitive personal information also includes government identifiers (including social security, driver's license, state identification card, or passport number), citizenship or immigration status, and precise geolocation data. As a general rule, we try not to collect or process any sensitive personal information about you, unless authorized by law or where necessary to comply with applicable laws or to provide benefits. We do not sell sensitive Personal Information collected under this Policy. In some circumstances, however, we may need to collect, or request on a voluntary disclosure basis, some Personal Information for legitimate employment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities (on the basis that it is in the public interest and in accordance with applicable law), monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to

provide work-related accommodations, health and insurance benefits to you and your dependents, or to manage absences from work.

2. **Sources of the Job Data**-In most instances, you will have provided the information we hold about you, but there may be situations where we collect Job Data or Personal Information from other sources. For example, we may collect the following:
 - a. Certain background and other information from recruitment agencies, academic institutions, referees, background checking agencies and other third parties during your recruitment.
 - b. Certain information on your performance, conduct or other information relevant to formal internal procedures (e.g. disciplinary or whistleblowing procedures), from customers or other organizations you routinely work with.
 - c. Information on your training and development from external training partners and information about your experience and impressions of ours through external survey providers.
 - d. Information about your health, including your fitness to carry out work and/or any accommodations or adjustments to be considered from your doctor, other specialist medical adviser or our appointed Medical Expert/SME.
 - e. Information on accidents or incidents from our insurance brokers, insurers and their appointed agents, where they are involved.
 - f. Information on tax payable from local tax authorities and our appointed payroll agents and tax/financial advisers.
 - g. Information collected through IT systems and other devices.
 - h. Information about your entitlement to participate in, or receive payments or benefits under, any insurance or pension scheme provided by us, from the relevant benefit provider or its appointed agent.
 - i. Information from publicly available sources (e.g. news sources and/or from social media platforms) in connection with any investigation or formal procedure concerning the same (for instance, for the investigation of an allegation that a staff member has breached our rules on social media use or conduct generally).
3. **How We Use Your Information**-Your personal information is used for the following purposes:
 - a. To process and manage your job application.
 - b. To communicate with you regarding your application status.
 - c. To assess your suitability for current and future job opportunities.
 - d. To conduct reference checks and verify your information.
 - e. To improve our recruitment process and candidate experience.
 - f. To comply with legal obligations and protect our legal rights.
4. **Data Sharing and Disclosure**-We take care to allow access to Job Data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate business purpose or other lawful ground for accessing it. Whenever we permit a third party to access Job Data, we will implement appropriate measures to ensure the information is used in a manner consistent with this Policy and that the security and confidentiality of the information is maintained. We may share your personal information with for internal process but are not limited to:
 - a. **Internal Personnel**: HR staff and hiring managers involved in the recruitment process.
 - b. **Service Providers**: Third-party vendors who assist us with recruitment-related services such as background checks and candidate assessments.
 - c. **Data Security**-We do not sell or rent your personal information to third parties for marketing purposes. We implement appropriate technical and organizational measures to protect your personal information against unauthorized access, loss, or misuse. However, no system can be completely secure, and we cannot guarantee the absolute security of your data. ***Our fundamental practice of sharing data to sell candidate information to third parties is strictly prohibited.***
 - d. **Data Retention**-We retain your personal information for as long as necessary to fulfill the purposes outlined in this policy, including to comply with legal, accounting, or reporting requirements. If your application is unsuccessful, ***we may retain your information for future job opportunities unless you request otherwise to remove from our applicant tracking system.***
5. **Your Rights**-You have the following rights regarding your personal information:

- a. **Access:** You can request a copy of your personal information we hold.
 - b. **Correction:** You can request correction of any inaccurate or incomplete information.
 - c. **SMS Opt-Out:** As a candidate you can opt out from bulk texts by texting 'Stop' to the receiving number. The opt-out will be automatic. The Candidate will no longer receive Bulk Texts. If you request to be opted out by a method other than texting, you can opt them out manually. To do this manually, kindly login to your account and open your candidate record and click on the 'Texting Consent Settings' icon.
 - d. **Deletion:** You can request the deletion of your personal information under certain circumstances. Pursuant to certain local, state, provincial, or federal law, you may have the right to request deletion of certain job data and/or sensitive personal information maintained in our system. Our team will comply with all applicable legal and regulatory obligations, but as set forth herein, there are certain legal and regulatory obligations imposed on us which require certain job data and/or sensitive personal information maintained by us even if a request for deletion for same is made. In general terms, the following is an illustrative and non-exhaustive list of the types of job data and/or sensitive personal information which have to be retained by our system:
 - 1. Legal Name.
 - 2. SSN.
 - 3. Date of birth.
 - 4. Payroll information (pay history, withholding history).
 - 5. Existing benefits information for current employees.
 - 6. Racial/gender information retained for reporting purposes.
 - 7. Information required for tax filings.
 - 8. Records relating to HR investigations or actions.
 - 9. Background check reports which serve as the basis for an adverse employment decision or action against the subject employee.
 - 10. Information that is required to be retained pursuant to applicable law. We will respond to all requests we receive from individuals wishing to exercise their data deletion rights in accordance with applicable laws. We will need to verify your identify consistent with applicable data protection laws before processing any such request, which may require you to provide additional information so that we may verify that the job data subject to the request is of you.
 - e. **To know your information:** Right to Know as a California Consumer-you have the right to request that we disclose certain information to you about our collection, use, disclosure, or sale of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, and subject to certain limitations that we describe below, we will disclose such information. You have the right to request any or all of the following:
 - 1. The categories of Personal Information that we have collected about you.
 - 2. The categories of sources from which the Personal Information is collected.
 - 3. Our business or commercial purpose for collection, use, or disclosure of that Personal Information.
 - 4. The categories of third parties with whom we sell or share that personal information.
 - 5. You can object to the processing of your personal information in certain situations.
 - f. **Data Portability:** You have the right to request a copy of Personal Information collected and maintained about you in the past 12 months. The CCPA allows you to request this information from us up to twice during a 12-month period. We will provide our response in a readily usable (in most cases, structured, commonly used and electronic machine-readable).
 - g. **Rights To Correct You:** You have the right to request the correction of any your personal information we maintain about you.
6. **Updates to this Policy-**We may update this Privacy Policy from time to time. Any changes will be posted on this page, and we will notify you of significant changes by email or through the portal.
7. **Contact Us-**If you have any questions or concerns about this privacy policy or our data practices, please contact us at contact@mdaedge.com

By registering and applying for jobs through our candidate portal, you acknowledge that you have read and understood this Privacy Policy and agree to the collection, use, and disclosure of your personal information as described herein.