

### Bank ABC Candidate Privacy Notice

This Candidate Privacy Notice (the "Notice") explains how Bank ABC and its subsidiaries, affiliates, and related entities (collectively "Bank ABC", "we", "us", and our) collect and process personal data about candidates for employment with us.

This Notice describes:

- the categories of personal data that we collect,
- how we use your personal data,
- how we secure your personal data,
- your rights regarding the personal data that we hold about you, including how you can access, correct, and request erasure, and
- when we may disclose your personal data to third parties.

We will only process your personal data in accordance with this Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

Your data controller is Bank ABC B.S.C, Bank ABC Tower, Diplomatic Area, P.O. Box 5698, Manama, Kingdom of Bahrain.

#### **Collection of Personal Data**

For the purposes of this Notice, personal data means any information about an identifiable individual (i.e., Bank ABC job candidate) collected in connection with the recruitment process. We may collect personal data directly from you, as a candidate for employment with us, or may receive personal data from third parties, for example, in connection with a background employment check.

We may collect, store, and process the following categories of personal data:

Type of Activity	Type of Personal Data
<b>CV and Application Review</b>	<ul style="list-style-type: none"> <li>- Information submitted as part of your CV and application submission.</li> <li>- Physical and electronic address details (e.g., telephone number, email and/or postal address and business telephone number).</li> <li>- Education and employment information (e.g., remuneration at your current employer, employment dates with your current and past employers, position information such as position title, and language skills).</li> <li>- And any additional information that is shared with us via your CV, cover letter, or application form.</li> </ul>
<b>Interview</b>	<ul style="list-style-type: none"> <li>- Interview performance evaluation and scores (e.g., recordings of any video interviews in which you participate).</li> <li>- Electronic and physical communication information, including but not limited to in- and outbound emails including attachments, phone conversations.</li> <li>- And anything you choose to submit by choice in support of your application.</li> </ul>

<b>Pre-employment Check</b>	<ul style="list-style-type: none"> <li>- Personal details and identification information (e.g., date of birth, nationality, picture, gender, ID card, passport numbers and other national ID numbers as required, immigration status).</li> <li>- Information about you that we are obliged to process for regulatory and governmental authorities (e.g., medical checkup, visa application, criminal clearance report, credit report, CBB forms etc.).</li> <li>- And any verifications of the information you shared with us.</li> </ul>
<b>Technical and Behavioral Testing</b>	<ul style="list-style-type: none"> <li>- Where relevant, results of technical and behavioral testing and information about personality traits such as data collected to assess a candidate's suitability.</li> </ul>
<b>Travel Booking</b>	<ul style="list-style-type: none"> <li>- Where relevant, information about you in connection of your travel booking.</li> </ul>

The above-mentioned personal data are collected:

- Directly from you (through the completion and submission of online application forms and profiles, through curriculum vitae, or through interviews or other means of communication);
- From third parties, such as recruitment agencies that you used to apply with, background check providers and other administration services providers; and
- From publicly available sources such as employment-orientated social networking sites and job boards.

If you provide information about your family or any other third party to us as part of your application (e.g., referees) then, before providing us with such information, you must inform the relevant individuals that you will disclose their personal data to us and provide a copy of the information in this Notice to them.

Failure to provide or allow us to process mandatory personal data may affect our ability to accomplish the purposes stated in this Privacy Notice.

### **Use of Personal Data**

We only process your personal data where applicable law permits or requires it in connection with carrying out our application and recruitment process, such as:

<b>Type of Activity</b>	<b>Type of Personal Data</b>
<b>Recruitment</b>	<ul style="list-style-type: none"> <li>- Identifying and evaluating candidates for employment with us, including assessing skills, qualifications, and interests for the purposes of determining suitability for the position for which you have applied.</li> <li>- Verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.</li> <li>- Communicating with you about the recruitment process and your application.</li> </ul>
<b>Pre-employment</b>	<ul style="list-style-type: none"> <li>- Preparing for and entering a contractual employment relationship such as offer approvals, carry out background checks as part of the employee onboarding process, including checking for any existing or potential conflicts</li> </ul>

	<p>of interest or any other restrictions which may otherwise restrict or prevent your employment with us.</p> <ul style="list-style-type: none"> <li>- Setting up internal profiles, collecting information required to complete the employee onboarding.</li> <li>- Creating and submitting reports as required by applicable laws or regulations.</li> <li>- Assisting in managing external providers involved in the onboarding process (e.g., insurance companies, pension funds, etc.).</li> </ul>
<p><b>Other purposes</b></p>	<ul style="list-style-type: none"> <li>- In addition to using your personal data for the position for which you have applied, we may retain and use your personal data to inform you about and consider you for other positions that may be appropriate for you with your consent.</li> <li>- Keeping records related to our hiring processes, for only as long as appropriate under the circumstances.</li> <li>- To comply with our legal, regulatory, or other corporate governance requirements.</li> <li>- To prevent fraud.</li> <li>- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.</li> </ul>

We will only process your personal data for the purposes we collected it for.

### **Collection and Use of Special Categories of Personal Data**

We may collect and process the following special categories of personal data when you voluntarily provide them, or we receive them from a third party, when relevant for a particular position to carry out our obligations under employment law, or as applicable law otherwise permits:

- Religion, race/ethnic origin to administer and apply for Bahrain visa/residency for employees and their families.
- Data concerning health or disability to comply with the mandatory pre-employment health check requirements, to determine appropriate workplace accommodations, and evaluate fitness for a particular position.
- Previous criminal charges or convictions as part of employee due diligence screening.

Where we have a legitimate need to process special categories of personal data about you for purposes not identified above, we will only do so after providing you with notice and, if required by law, obtaining your prior, express consent.

### **Data Sharing**

We will only disclose your personal data to third parties where required by law or to our third-party service providers who require such information to assist us with various services, including, but not limited to:

- obtaining employment verification,
- obtaining background checks,
- providing data storage or hosting.

These third-party service providers may be located outside of the country in which you live or the country where the position you have applied for is located.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to process your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

We may also disclose your personal data to comply with legal obligations or valid legal processes or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.

### **Cross-Border Data Transfers**

The personal data transferred within, or outside Bank ABC is in some cases also processed in other countries. We only transfer your personal data abroad to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that guarantees adequate protection, based on appropriate safeguards (e.g., Data Processing Agreements).

### **Data Security**

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was collected or to comply with legal, regulatory, or internal requirements, whichever is longer. If consent was provided, personal data relating to unsuccessful applicants for roles with Bank ABC is kept for 24 months for other suitable roles consideration.

If your application is successful, your application and supporting documentation will be retained as part of your employment record.

### **Your Rights**

In relation to your personal data and to the extent permitted under the applicable data protection laws, you may have the right to:

- Access and to obtain a copy of your personal data as processed by Bank ABC.
- If you believe that any information, we hold about you is incorrect or incomplete, you may also request the correction of your personal data;
- Object to processing of your personal data causing material of moral damage;
- Object to processing based on automated decision making;
- Request the discontinuance of collection, use, storage, transfer or other processing of your personal data as described in this Notice;
- Object to the collection, use, storage, transfer or other processing of your personal data as described in this Notice;
- Request restriction on the processing of your personal data; and/or
- Request erasure of your personal data;

- Withdraw your consent where Bank ABC obtained your consent to process personal data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

We honor such requests, as required under the applicable data protection laws, but these rights are not absolute, and they do not always apply, and exemptions may be engaged.

#### **Personal Data Accuracy**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the recruitment process.

#### **Data Protection Officer**

We have appointed a Data Protection Officer (the "DPO") to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal data, please contact the DPO at: [groupdataprotection@bank-abc.com](mailto:groupdataprotection@bank-abc.com)

If you are unsatisfied with our response to any issues that you raise with the DPO, you may have the right to make a complaint with the data protection authority in your jurisdiction by contacting the Data Protection Authority.

#### **Changes to This Privacy Notice**

The Privacy Notice was most recently updated in March 2025.