

Candidate Privacy Notice

For recruiting workflows powered by HarmonyATS

Effective Date	05.12.2025
Platform	HarmonyATS
Platform Provider	HarmonyHR LTD
Platform Contact	info@harmonyats.org

This Candidate Privacy Notice explains how the hiring company identified in the relevant job posting, application page, careers site, or recruitment communication (the “Hiring Company”, “Company”, “we”, “us”, or “our”) collects, uses, shares, stores, and otherwise processes personal data relating to job applicants, prospective candidates, and other individuals participating in a recruitment process run by the Company.

When the Company uses HarmonyATS to manage applications and recruiting workflows, HarmonyHR LTD operates HarmonyATS as a platform provider and generally acts as the Company’s processor or service provider for candidate personal data processed on the Company’s behalf. HarmonyHR LTD is not ordinarily the main controller for the Company’s recruiting decisions or hiring activities.

1. Who is responsible for your personal data?

The Hiring Company identified in the relevant job posting, application page, careers site, candidate portal, or recruitment communication is normally the controller of your personal data for the recruiting activities described in this notice. The Hiring Company decides why and how candidate personal data is processed for those purposes.

If you have questions about the Hiring Company’s handling of your personal data, or if you wish to exercise privacy rights in relation to the Hiring Company’s recruitment activities, you should contact the Hiring Company using the contact details made available in the relevant job posting, application flow, candidate portal, or recruitment communications.

HarmonyHR LTD, incorporated and operating under the laws of Kyrgyz Republic, Register № 309328-3301-000, having its registered office at Imeni Baltagulova st., 27, Bishkek, Kyrgyz Republic, provides the HarmonyATS platform. For platform-provider privacy matters, HarmonyHR LTD may be contacted at info@harmonyats.org.

Where HarmonyHR LTD acts solely as a processor or service provider for the Hiring Company, it processes candidate personal data on the Hiring Company’s documented instructions, subject to the contract between HarmonyHR LTD and the Hiring Company. If your question relates to the substance of the hiring process, a recruitment decision, or deletion or correction of a candidate profile, you should generally contact the Hiring Company first.

2. What personal data may be processed?

Depending on the role, application stage, recruitment setup, and tools used by the Hiring Company, personal data processed in connection with the recruitment process may include identification and contact details, such as your name, email address, telephone number, postal address, current location, and professional profile links.

It may also include application and profile information, such as your résumé or CV, cover letter, employment history, education, qualifications, certifications, skills, language abilities, work authorization information, salary expectations, notice period, and role preferences.

Recruitment process information may include application status, interview scheduling information, interviewer notes, feedback, evaluation forms, scoring records, communications with you, and records of recruiting decisions.

Where relevant and lawful, personal data may also include assessment information, such as results of skills tests, case studies, technical tasks, screening questionnaires, background information, and publicly available professional information from professional networking platforms, portfolio websites, publications, or other sources you have chosen to make public.

Where permitted by law and relevant to the recruitment process or legal compliance, the Hiring Company may also process equal opportunity or diversity information, disability accommodation information, or other special-category or sensitive data.

3. Where does the Hiring Company obtain your personal data?

The Hiring Company may obtain your personal data directly from you, for example when you submit an application, complete a form, correspond with recruiters, attend interviews, provide documents, or otherwise participate in the recruitment process.

The Hiring Company may also obtain your personal data from recruitment agencies, referrers, employee referrals, other intermediaries acting on your or the Hiring Company's behalf, publicly available sources, and professional networking or portfolio platforms where permitted by law.

Where lawful and relevant, personal data may also be obtained from current or former employers, referees, background screening providers, educational institutions, or other verification sources, subject to any required authorization or legal basis.

Additional personal data may be generated internally during the recruitment process by the Hiring Company's recruiting team, interviewers, managers, or decision-makers, including notes, assessments, interview feedback, and status records, and may also be collected through the operation of HarmonyATS and related recruiting tools used by the Hiring Company.

4. Why does the Hiring Company process your personal data, and on what legal bases?

The Hiring Company may process your personal data to review your application, assess your suitability for a role, communicate with you, arrange interviews, verify information, manage candidate pipelines, coordinate hiring teams, make recruitment decisions, maintain records of the recruitment process, and improve recruiting administration.

The Hiring Company may also process personal data to provide reasonable accommodations, respond to accessibility or interview-adjustment requests, keep your details for future opportunities where it has an appropriate lawful basis, comply with legal, regulatory, governance, and recordkeeping requirements, and establish, exercise, or defend legal claims.

Depending on the relevant jurisdiction and the context of the processing, the Hiring Company may rely on one or more lawful bases, including taking steps at your request before entering into an employment or contractor arrangement, legitimate interests, compliance with legal obligations, consent where required, and any other lawful basis available under applicable law.

Where career pages, candidate portals, or application forms use cookies or similar technologies, non-essential technologies may be used only where and to the extent permitted by applicable law and, where required, on the basis of consent.

5. HarmonyATS platform-provider role

The Hiring Company may use HarmonyATS, a cloud SaaS applicant tracking system provided by HarmonyHR LTD, to host and manage recruiting workflows.

In that context, the Hiring Company is normally the controller or employer deciding the purposes and means of candidate-data processing for its recruitment activities, and HarmonyHR LTD generally acts as a processor or service provider when it processes candidate personal data on the Hiring Company's behalf in order to deliver, maintain, secure, support, and administer HarmonyATS.

HarmonyHR LTD may separately process limited information as a controller for its own legitimate corporate purposes where applicable, such as platform security, abuse prevention, legal compliance, invoicing, sanctions screening, internal security operations, and handling inquiries directed to HarmonyHR LTD, but not for the Hiring Company's recruitment decision-making.

HarmonyHR LTD may use vendors, service providers, and approved subprocessors to support hosting, maintenance, support, communications, security, infrastructure, analytics, backup, and related platform operations for HarmonyATS. Such providers may be added, replaced, or removed from time to time in the ordinary course of business, subject to applicable law and contractual controls. HarmonyHR LTD is not required to maintain or publish a separate public subprocessor list for this notice to operate effectively.

6. Who may receive your personal data?

Personal data may be shared with the Hiring Company's recruiting, people, management, interview, and administration teams and with other internal personnel who have a legitimate need to know the information for recruitment-related purposes.

Personal data may also be shared with HarmonyHR LTD as the provider of HarmonyATS and with HarmonyHR LTD's service providers, vendors, and subprocessors that support hosting, maintenance, communications, analytics, support, backup, security, infrastructure, or related platform operations, as well as with recruitment agencies, assessment providers, background screening providers, scheduling tools, communication providers, and other recruiting-service partners engaged by or for the Hiring Company where relevant.

Personal data may further be disclosed to professional advisers, auditors, insurers, legal counsel, regulators, courts, law-enforcement authorities, and entities involved in a corporate transaction, reorganization, financing, or sale of business assets where required or reasonably necessary and subject to appropriate confidentiality and data-protection safeguards.

7. International transfers

The Hiring Company, HarmonyHR LTD, and their respective service providers may process or access personal data in countries other than the country in which you are located.

Where personal data is transferred internationally, the relevant controller or processor will implement appropriate safeguards where required by applicable law, which may include adequacy decisions, standard contractual clauses, the UK International Data Transfer Addendum, or another lawful transfer mechanism recognized under applicable law.

For questions about international transfers relating to the substance of the recruitment process, you should contact the Hiring Company. For platform-provider questions specific to HarmonyATS, you may contact HarmonyHR LTD at info@harmonyats.org.

8. How long is personal data retained?

The Hiring Company should keep candidate personal data only for as long as reasonably necessary for the purposes described in this notice, including ongoing recruitment, compliance, internal governance, recordkeeping, and legal-defense needs, and should then delete, anonymize, or otherwise securely dispose of the data in accordance with applicable law.

In practice, retention may vary depending on whether your application is active, unsuccessful, moved to a talent pool, subject to a legal hold, or associated with a complaint, challenge, or statutory retention requirement.

Where the Hiring Company uses HarmonyATS, deletion or return of candidate personal data by HarmonyHR LTD will generally be governed by the agreement between the Hiring Company and HarmonyHR LTD, including any applicable data processing addendum, service terms, and technical retention and deletion processes.

9. Your privacy rights

Subject to applicable law and any relevant limitations or exceptions, you may have the right to request access to your personal data, request correction of inaccurate or incomplete data, request deletion of your personal data, request restriction of processing, object to certain processing, receive your personal data in a portable format where applicable, withdraw consent where processing relies on consent, and lodge a complaint with a competent supervisory authority or regulator.

To exercise your rights, you should contact the Hiring Company using the contact details made available in the job posting, application page, candidate portal, or recruitment communications. The Hiring Company may ask you to verify your identity before acting on your request and may have grounds under applicable law to deny or limit a request in certain circumstances.

If your request specifically concerns data processed in HarmonyATS on behalf of the Hiring Company and you contact HarmonyHR LTD directly, HarmonyHR LTD may redirect your request to the Hiring Company or otherwise handle it in accordance with applicable law and its contractual obligations.

10. Talent pools, assessments, interview recordings, and automated tools

If the Hiring Company retains candidate details for future opportunities beyond the current recruitment process, it should do so only where it has an appropriate lawful basis and, where required, your consent.

The Hiring Company may use interviews, skills assessments, screening questionnaires, scheduling tools, recorded meetings, or other evaluation technologies as part of its recruitment process. Where required by law, the Hiring Company should provide any additional notices and obtain any necessary consent before recording interviews or processing particular categories of assessment information.

Any AI-assisted, automated, or decision-support functionality used in connection with the recruitment process should be subject to appropriate human review and legal compliance controls. HarmonyHR LTD does not make recruiting decisions on behalf of the Hiring Company.

11. Career pages, cookies, and similar technologies

If the Hiring Company operates career pages, application forms, or candidate portals, it may use cookies and similar technologies to make those pages work, secure the application flow, understand

usage, measure performance, and support related recruiting operations. Online identifiers collected through those technologies may constitute personal data in some circumstances.

The Hiring Company should ensure that its website privacy and cookie disclosures are consistent with this notice and should obtain consent for non-essential cookies or similar technologies where required by law.

When HarmonyHR LTD operates its own websites or online properties relating to HarmonyATS, the use of cookies and similar technologies on those properties is governed by HarmonyHR LTD's own Privacy Policy and Cookie Notice.

12. Security

The Hiring Company and HarmonyHR LTD should each implement appropriate technical and organizational measures designed to protect candidate personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access, taking into account the nature of the data and the risks involved.

No system can be completely secure. HarmonyHR LTD does not guarantee that HarmonyATS or any related recruiting workflow will be uninterrupted, error-free, or invulnerable to every security threat, but applies reasonable safeguards appropriate to its role as platform provider.

13. Questions, complaints, and changes to this notice

If you have questions about this notice, about the Hiring Company's recruiting process, or about how your personal data is handled as part of that process, you should contact the Hiring Company using the details made available in the relevant job posting, application page, candidate portal, or recruitment communications.

If you have a platform-specific question about HarmonyATS as a service provider, you may also contact HarmonyHR LTD at info@harmonyats.org. HarmonyHR LTD may direct you back to the Hiring Company where the Hiring Company is the appropriate contact as controller.

The Hiring Company may update this Candidate Privacy Notice from time to time to reflect changes in its recruiting practices, legal requirements, or the technologies used in connection with recruitment. Where required by law, material changes should be communicated in an appropriate manner.