

RECRUITMENT PRIVACY NOTICE

This privacy notice will inform you as to how Dexis Interactive LLC. d.b.a Dexis Consulting Group [and its affiliates] (“Dexis”, “we”, “us” or “our”) collect and use personal information relating to job applicants as part of our recruitment processes.

Please read the following information carefully, before submitting your application, to understand how your personal information will be processed by Dexis.

What is our recruitment process?

Our recruitment processes can vary depending on the role you are applying for. However, in general, when you apply for a role with us, we will process your personal information as part of a screening process to determine whether you meet the published job requirements to be shortlisted for the job. We may use third-party service providers to assist us with this screening process and have provided more information in the “sharing your personal information” section below.

If you meet the job requirements, your application may be considered by a selection panel. During the recruitment process, there may be multiple stages of interview and/or competency assessments depending on the job. There is no single ‘right’ process for all Dexis jobs and our processes will vary depending on the nature of the role you are applying for. Our application process will enable us to decide the relative merit of candidates against the skills and experience required by the job.

We will use the information you provide to us, as well as other information collected during the recruitment process, to decide whether to offer you the job.

Please be aware that Dexis is an equal opportunity employer and is committed to complying with all applicable laws. We celebrate diversity and are committed to building and maintaining a diverse and inclusive workforce. All qualified applicants and employees will receive consideration for employment regardless of—and will be free from discrimination on account of—their race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, citizenship status, age, disability, genetic information, or any other category protected under applicable law.

Any individuals with a disability requiring a reasonable accommodation to assist with their job application for employment should send an e-mail to recruiting@dexisonline.com. The e-mail should include a description of the requested accommodation and the position you’re applying for or interested in.

What personal information do we collect?

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- **Application data:** The information you have provided to us in your curriculum vitae and covering letter.
- **Identity and contact data:** The information you have provided on our application form, including your name, address, telephone number, personal email address.
- **Applicant context data:** Any documentation to prove identity, employment history, references, qualifications and whether you are authorised to work in the US (where relevant).

- **Role-specific data:** Any information included as part of the application as specific to the role, such as requisite security clearances granted by the relevant US government agency/ies, location or language proficiency.
- **Recruitment process data:** Any other information you provide to us during the recruitment process such as information provided at interview and/or during competency assessments.

We may also collect, store and use the following types of more sensitive personal information for equal opportunities monitoring and reporting. The provision of this diversity information is voluntary. It is not used to make decisions about individuals as part of the hiring process. When we collect this information, we will ask you to confirm expressly that you agree to us collecting it. The information we collect may include:

- **Diversity data:** information about your race or ethnicity, religious beliefs, gender, veteran status, health, including any medical condition and/or disability.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies.
- Background check provider(s) (defined below).
- Your named references.
- From LinkedIn when you decide to make your application through LinkedIn.
- From publicly accessible sources.

How will we use your personal information?

We will use the personal information we collect about you to:

- Assess your skills and qualifications for the job.
- Carry out background, security, credit and/or reference checks, where applicable and permitted by law.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Undertake equal opportunities monitoring.

It is in our legitimate interests to assess whether to appoint you for the job since it would be beneficial to our business to hire for the advertised role. If you fail to provide information which is necessary for us to consider your application when required, we will not be able to process your application successfully. For example, if we require a credit check or references for this role (where permitted by law) and you fail to provide us with relevant details, we will not be able to take your application further.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Sharing your personal information

We will share personal information about you with:

- our third-party service providers for the purposes of running the early stages of our recruitment processes (such as recruitment agencies).
- Your references.
- Government agencies responsible for conducting enhanced security checks (where necessary and appropriate).

Where is your information accessed?

Dexis undertakes global initiatives and is based in the United States. We generally store your personal information within the US or within the location of a field office. Sometimes we use service providers who access your personal information in other countries. For EU and UK data subjects, where the EU and/or UK do not permit the free flow of data to a particular jurisdiction, other mechanisms are employed to ensure the safe transfer of or access to the data. These include the UK's International data transfer agreement or the EU's standard contractual clauses (in particular module one (controller to controller transfer) and module two (controller to processor transfer)).

How long do we keep your personal information?

We will only keep your personal information for as long as we need it to achieve the purposes for which we collected it, to comply with our legal and regulatory obligations, to exercise our legal rights and to protect ourselves from legal claims.

Your personal data will be retained by us for 7 years after your candidate status is no longer active, that is, after all active applications within our applicant tracking system (currently Greenhouse) have been rejected and you are no longer considered an active applicant. Due to the specialized nature of some of the positions we recruit for, as well as the frequency of recruitment for other positions, we frequently contact previous applicants about additional related opportunities. We do this to offer candidates the full advantage of the breadth of opportunities across the organization and allow our recruitment team to leverage the diversity of talent kept within its historical application records. When the seven year period has been reached, our Recruitment team, can be contacted at recruiting@dexisonline.com, will notify you of the end of the retention period and offer you an opportunity to extend the retention period by one more year. If no response is received, we will delete your personal data. At the end of that period or once you withdraw your consent, your personal details are removed.

If your employment application is successful, personal information gathered during the recruitment process will be transferred to your personnel file and retained pursuant to applicable laws. The periods for which your data will be held will be provided to you.

ADDITIONAL NOTICE FOR CALIFORNIA RESIDENTS

California law requires covered businesses to make certain disclosures and to offer data rights to California residents whose personal data is collected or otherwise processed by the business. This section is only applicable to Dexis job applicants who reside in California.

Within the past 12 months, the categories of personal information we have collected in the context of our recruitment processes, as such categories are described in California law, are as follows:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address

- Characteristics of protected classifications under California or federal law.
- Professional or employment-related information.
- Education information
- Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collection and Use of Sensitive Personal Information

Dexis may collect and otherwise process personal information that is categorized as “sensitive” under California law. Such data categories may include: information revealing race or ethnic origin, citizenship or immigration status. We use these data elements to verify identity, evaluate candidates for positions, assess eligibility and suitability for positions, perform background checks, .

Sources of Personal Data and Purposes of Processing

The section above entitled, “[How is your personal information collected](#)” details our sources of personal information. The section entitled, “[Sharing your personal information](#)” details the business or commercial purposes for collecting, selling, or sharing personal information.

Disclosure of Your Personal Information

The table below identifies how in the past 12 months we have disclosed information collected about individuals.

Personal Information Disclosed	Business Purpose for Disclosure	Categories of Third Parties Disclosed to
<p>Identifiers. Certain basic identifying data such as: first and last name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> - To facilitate recruitment processes. - To conduct background investigations, including criminal background checks. 	<ul style="list-style-type: none"> - Recruitment agencies. - Individuals you provide as references. - Third parties that conduct background investigations.
<p>Sensitive Identifiers. Dexis may share certain sensitive identifier data such as: data that reveals a consumer’s racial or ethnic origin or information concerning your finances.</p>	<ul style="list-style-type: none"> - For internal reporting to assess the effectiveness of our DEIA recruitment efforts and hiring practices - To comply with AAP reporting guidelines. 	<ul style="list-style-type: none"> - AAP auditor (Letitia Little to confirm)

<p>Protected Classifications. Such as information about protected classifications such as race, religious background, or medical information.</p>	<ul style="list-style-type: none"> - For internal reporting to assess the effectiveness of our DEIA recruitment efforts and hiring practices - To comply with AAP reporting guidelines. 	<p>-AAP data is shared with a third party that prepares Dexis' AAP</p>
<p>Employment Information. Includes professional and employment-related information such as an employer's name and employees' names, job titles, responsibilities, practice areas, specialties, qualifications, and/or areas of focus.</p>	<ul style="list-style-type: none"> - To facilitate recruitment processes. - To evaluate your eligibility and suitability for a given role - To conduct background investigations, including criminal background checks. 	<ul style="list-style-type: none"> - Recruitment agencies. - Individuals you provide as references. - Third parties that conduct background investigations.
<p>Education Background. Includes information about education or educational background, including educational records as defined in federal law.</p>	<ul style="list-style-type: none"> - To facilitate recruitment processes. - To evaluate your eligibility and suitability for a given role - To conduct background investigations, including criminal background checks. 	<ul style="list-style-type: none"> - Recruitment agencies. - Individuals you provide as references. - Third parties that conduct background investigations.

Data Sales and Sharing in California

Dexis does not exchange or otherwise make available personal data we collect in the context of recruitment to third parties for the purpose of cross-context behavioral advertising, which would be defined as data "sharing" under California law.

Dexis may make the personal information we collect about you available to third parties in exchange for valuable consideration, which may constitute a “sale.” For instance, when we make your data available to background check companies who then provide us their services, this exchange may constitute a “sale” under California law.

You may opt out of the sale of your personal information by visiting our [website](#) footer and clicking “Do Not Sell or Share My Personal Information. We do not sell the personal information of individuals who we know to be under 16 years of age. To exercise the right to opt out, you may submit a request to use by visiting our [website](#) footer and clicking “Do Not Sell or Share My Personal Information.

Data Storage and Retention

We will store your personal information until the initial purpose for which we collected such data has been satisfied, including the purpose described in our “[How long do we keep your personal information](#)” section, or as required by law, regulation, or professional standards. If you consent to a new or additional purpose for retaining your data, your personal information may be stored for longer. We have implemented measures designed to secure your personal information against unauthorized use, loss, destruction or alteration. We cannot guarantee the security of your personal information.

We retain your data according to a set retention schedule, which can be generally described as follows: we retain your data as necessary for a minimum of 7 years to provide the services for which it was collected, and to protect ourselves against legal claims. At the end of that retention period, all data is deleted unless retention is required by law, regulation, or professional standards.

Your California Privacy Rights

If you are a California resident, you have the following rights regarding your personal information:

- 1) Right to Access. You have the right to access the personal information we have collected about you.
- 2) Right to Know. You have the right to request that we disclose the following about your personal information in the preceding 12 months:
 - a. The categories of personal information we collected about you;
 - b. The categories of sources from which we collected your personal information;
 - c. The business or commercial purposes for collecting, selling, or sharing your personal information;
 - d. The categories of third parties to whom we disclose your personal information; and
 - e. The specific pieces of personal information we have collected about you.
- 3) Right to Delete. You have the right to request that we delete your personal information. Upon verifying your identity, we will delete your personal information from our records and instruct our service providers, affiliates, or third parties to delete your information as required by law. We may deny your deletion request if retaining the information is permitted under law.
- 4) Right to Correct. You have the right to correct inaccurate personal information that we maintain about you. Upon verifying your identity, we will use reasonable efforts to correct your personal information as directed. In certain circumstances, we may not be able to satisfy a correction request depending on the nature of the personal information and purposes for maintaining it.
- 5) Right to Opt-out of Data Sales. You have the right to direct us to not sell your personal information. To exercise the right to opt out, you may submit a request to us by visiting our

[website](#) footer and clicking “Do Not Sell or Share My Personal Information. Once you make an opt-out request, we will wait at least twelve months before asking you to reauthorize personal information sales. You do not need to create an account with us to exercise your opt out rights.

[Note that Dexis does not engage in data “sharing,” which is the provision of your personal information to a third party for them to target cross-context behavioural advertising to you.]

- 6) Right to Limit Use of Sensitive Personal Information. You have the right to limit how your sensitive personal information is used and/or disclosed to third parties. Please visit our [website](#) footer and click “Do Not Sell or Share My Personal Information to exercise this right.

You may exercise your ‘Do Not Sell or Share My Personal Information’ by visiting our [website](#) footer and clicking “Do Not Sell or Share My Personal Information. We will record your request.

We may not discriminate against you for exercising any of these rights.

You may designate an authorized agent to make a request to know, request to correct, or request to delete on your behalf. An agent may be an individual or a business entity. To designate an authorized agent, you must provide the agent with written permission to submit the request. We may still require you to verify your identity directly (subject to certain exceptions). We may refuse a request if the agent does not provide adequate proof of their authorization.

How to Exercise These Rights

You may request to exercise the foregoing rights by visiting our [website](#) footer and clicking “Do Not Sell or Share My Personal Information.”

Please note that we may take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. In connection with such verification, we may ask you to provide your name, email address, physical address or zip code and phone number. We may limit our response to your exercise of the above rights as permitted by law.

Information for EU and UK data subjects

Legitimate Grounds for Collecting Personal Information

We will only use your personal information when the law allows us to. Usually, we will use your personal information in the following circumstances:

- where it is necessary for our **‘legitimate interests’** (or those of a third party) and your interests and rights do not override our interests;
- where you have given us your **consent**;
- where we need to comply with the **law**.

When we refer to our ‘legitimate interests’, we mean our ability to undertake recruitment and collect data for diversity and monitoring purposes.

The information below sets out in detail the types of data we collect and the purposes and legal basis for processing the data. It applies where we are processing the personal information of EU and UK data subjects:

TYPE OF DATA:

- **Purpose:** Application data
- **Lawful basis for processing including legitimate interests:** our legitimate interests in assessing an applicant's experience and motivation for applying to a role.

TYPE OF DATA:

- **Purpose:** Identity and contact data
- **Lawful basis for processing including legitimate interests:** our legitimate interests in collecting your contact details to correspond with you regarding your application.

TYPE OF DATA:

- **Purpose:** Applicant context data
- **Lawful basis for processing including legitimate interests:** our legitimate interests in undertaking background checks to verify your application and to comply with laws.

TYPE OF DATA:

- **Purpose:** Role-specific data
- **Lawful basis for processing including legitimate interests:** our legitimate interests in seeking certain skills and proficiencies and undertaking security vetting where this is required for the role.

TYPE OF DATA:

- **Purpose:** Recruitment process data
- **Lawful basis for processing including legitimate interests:** our legitimate interests in assessing an applicant's experience, competence and fit for the role and Dexis.

TYPE OF DATA:

- **Purpose:** Criminal checks data
- **Lawful basis for processing including legitimate interests:** our legitimate interests when there is justification for collecting information about criminal convictions, to comply with and in accordance with applicable laws.

TYPE OF DATA:

- **Purpose:** Covid-19 vaccination data
- **Lawful basis for processing including legitimate interests:** to comply with applicable laws.

TYPE OF DATA:

- **Purpose:** Diversity data
- **Lawful basis for processing including legitimate interests:** where you have consented to us processing this data.

If you are a UK or EEA data subject, you have the right:

- to request **access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully;
- to **correct, delete or restrict** (stop any active use of) your personal information;
- to request the **transfer** of your personal information to you or to a third party in certain circumstances. We will provide your personal information to you (or the third party you have chosen) in a structured, commonly used, machine-readable format;
- to **object** to the processing of your personal information in certain circumstances;
- to **withdraw consent** where you have given us consent to use your personal information. If you withdraw consent we will stop using your personal information immediately, unless we are required to process it for a different purpose (for example, the information is necessary to comply with a legal obligation). If you decide to withdraw your consent, this will not affect the lawfulness of our processing before your consent was withdrawn;
- to **opt out** of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.

These rights may be limited, for example if answering your request would reveal personal information about another person or if you ask us to delete information which we are required by law to keep. If you still have concerns, you have the right to complain to the data protection authority (see below for further details).

To exercise any of these rights, or to make a complaint to us, you can get in touch using the details set out in the “who we are and how you can get in touch” section below.

Who We Are and How You Can Get In Touch

Dexis Consulting Group is a US company with registered address 3601 Wilson Blvd, Suite 220, Arlington, Virginia 22201, United States.

If you have any questions about this privacy notice, including any requests to exercise your legal rights outlined above, please contact us by emailing info@dexisonline.com.

Individuals in the UK and the EEA have the right to make a complaint at any time to the local data protection supervisory authority. For details of supervisory authorities in the EEA see here. For the UK’s data protection authority, contact the Information Commissioner’s Office (ICO) here. We would, however, appreciate the chance to deal with your concerns before you approach the relevant supervisory authority so please contact us by emailing info@dexisonline.com in the first instance.

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