

## **W4 Games Recruitment Data Privacy Notice**

This notice describes how W4 Games Limited (“W4”), and/or subsidiaries it may establish from time to time (“W4”, “we”, “us”, “our”), uses data from candidates we consider and/or recruit for a position at W4. This notice also describes how we use data from individuals who provide references for candidates (“referees”).

### **I. Data We Collect (General)**

We may collect personal data as follows:

- Name, email address, resume and any other information candidates submit to us in connection with employment opportunities.
- Information provided to us by third parties (such information, “Materials”) for review by W4.
- Contact details, resume, job and education history, endorsements and interests from third-party publicly available sources, such as LinkedIn, and third-party recruitment platforms that collate this information from publicly available sources.

If a candidate chooses to submit Materials, we will use those Materials only for evaluation purposes and will not make any copies without the candidate’s permission, nor will we distribute any copies of the Materials to any third parties. We will return or destroy all copies of Materials upon completion of our review or upon the candidate’s earlier request.

W4 engages in a continuous program to develop new products and ideas internally, and we also regularly receive other submissions for consideration. The products, ideas or concepts that W4 develops internally or that others submit may be similar to a candidate’s Material. As a result, we cannot agree to treat as confidential any Material submitted, even if it is marked as confidential or proprietary. Our acceptance or review of a candidate’s Material does not imply that we will use, develop or market it. Nor does our review of candidate’s Material prevent us from using, developing, or marketing technologies, ideas or products that may be similar in concept or idea to such Material.

From referees, we may collect name, email address, contact number and the details about their relationship with the candidate, as well as the opinions expressed in the references provided.

### **II. How We Use Personal Data**

W4 uses the information described above to:

- Manage a candidate’s relationship with us.
- Contact candidates (including by email) about suitable job opportunities as they arise.
- Assess candidates’ eligibility for available positions at W4.
- Process job application(s).
- Send invitations to W4 recruitment events (including by email).
- In aggregate form only, for W4’s business planning, analysis of hire trends and internal data reporting purposes.

### **III. Legal Basis For Processing**

We rely on a number of legal grounds to process your personal data. For example, we will process your data where we have your consent, where we have a legitimate interest to do so (and that legitimate interest is not overridden by your data protection interests or fundamental rights and freedoms), where the processing is necessary for the performance of a contract with you, or where we have a legal obligation to process your data. If you wish to learn more about the specific legal ground(s) we rely on to process your data for any particular purpose (including any legitimate interests we have to process personal data), then please contact us using the details provided below.

### **IV. Where We Hold Your Data**

W4 is a company organized under the laws of Ireland. As such, your data may be stored and processed for the purposes set out in this notice by W4 or in other countries in which W4 may establish subsidiaries, affiliated entities or operate from time to time. Some of these countries may not offer the same level of privacy protection as the laws in your country of residence or citizenship, but W4 will take appropriate measures to protect your personal data in accordance with this notice wherever your personal data is stored and used.

### **V. Data We Share With Third Parties**

We will not share data that directly identifies you with independent third parties without your consent, unless such disclosure is:

- in response to lawful requests by public bodies, including to meet national security or law enforcement requirements;
- otherwise required by law;
- reasonably necessary to enforce our policies, procedures, rights, property or operations or to protect our employees, players or third parties;
- reasonably necessary in the event of a reorganization, divestiture, merger, sale or bankruptcy.

We may use third party agents to process your personal data on our behalf. It is our responsibility to ensure that our agents and service providers protect your data in accordance with the commitments given in this notice.

Where personal data is transferred to third party agents in accordance with this notice, W4 remains liable for treatment of your personal data.

Referees' opinions may only be shared with the relevant candidate in response to a subject access request. In those cases, we will endeavor to redact as much personal information from the opinion as possible.

### **VI. How We Protect Your Data**

Security is a priority at W4 and will take such measures as are necessary to help protect your personal data. Even so, please be aware that no security measure is 100% perfect.

## **VII. How Long Does W4 Retain Your Data?**

We will only retain personal data for as long as reasonably necessary to comply with the law and/or where there is a legitimate business purpose to retain it. Generally, this means W4 retains your data for as long as reasonably necessary in connection with the consideration of candidates for current or potential employment opportunities, to deal with any legal matters (e.g. judicial or disciplinary actions), or to comply with archiving requirements or statutory limitations.

Any materials will be returned or destroyed upon completion of our review or upon your earlier request. See below for details of how to request deletion of your personal data.

## **VIII. Your Rights**

To request access to any other personal data we hold about you, to request deletion or to submit any other request in relation to your privacy rights, please contact us. Before we process any request, we may ask you for certain personal information to verify your identity.

Should you wish to delete your data, W4 may still be required to retain certain data for legal or administrative reasons. For example, W4 may require some personal data to resolve disputes, protect our legal rights, and comply with technical and legal requirements and constraints related to the security, integrity and operation of our business. We will however only retain personal data for as long as reasonably necessary to comply with the law and run our business.

Depending on where you are resident, you may have other rights available to you under your local data protection laws, beyond those described above. These may include rights to portability of personal information, to object to processing of personal information, or to request that we restrict processing of information. If available, you can request to exercise these rights.

## **IX. Privacy-Related Queries**

For any concerns related to the handling of your personal data, you can contact W4's Data Protection Officer by writing to [privacy@w4games.com](mailto:privacy@w4games.com).