

Candidate Privacy Notice

Updated 17.07.2026

Summary

iBASIS is committed to protecting your privacy. This Privacy Notice explains how we process personal data about you ("personal data") as a candidate during our recruitment process, including where this is carried out through the Applicant Tracking System ("ATS") platform provided by Deel. Please read this Notice carefully. We will only use your personal data as set out here.

Who we are?

The controller of your personal data is the iBASIS legal entity to which you are applying. "iBASIS" refers to the group of companies held by iBASIS Group, S.A.S., which provides international telecommunication services and related value-added services. A list of our legal entities is available here: <https://iBASIS.com/contact/>.

What we collect about you?

We process personal data that you provide to us directly, as well as personal data generated during your recruitment process. The categories of personal data we process are generally as follows:

Information that may be provided by you:

- Identity information such as name, age, gender, nationality, and date of birth.
- Contact information such as residential address, email address, and phone number.
- Professional information, such as your CV, work experience, education, skills, certifications and, for expert-level positions, degree certificates, as well as your LinkedIn profile, where provided.
- Health information (if you supply it because it is relevant to your recruitment) such as information regarding disabilities.
- Identification documents, which we request only at the final stages of the recruitment process, for the purpose of preparing your employment contract.
- Any other information you choose to submit to us as part of your application.

Information that may be collected about you:

- Application information such as information provided through your recruitment process such as interview notes.
- Background information such as information about you that is available through public sources, received from references or found by conducting a background check.

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- Electronic communication information, such as information provided in calls or cookies. In case of cookies or similar technologies, when you apply via our ATS, the data shall be processed as mentioned here: <https://www.deel.com/legal/cookies-policy/>.

Why we process your data and our legal basis?

We process your personal data for specific purposes related to the recruitment process, and we rely on clear legal bases to do so. Below, we explain each purpose, the types of data involved, and why we are legally permitted to process your data:

Handling your job application

- **Purpose:** To evaluate your candidacy, communicate with you, and schedule interviews. This includes reviewing your CV, assessing your skills, and providing feedback to the hiring team.
- **Data processed:** Identity and contact information, professional information, health information, and application-related information.
- **Legal basis:** It is necessary to process your data as prior steps before entering into a work contract with you and to carry out our legal obligations and rights in the field of employment. If you decide to share with us extra information about yourself, exceeding what we are required to collect based on the above bases, or if you wish that we keep the data for future recruitment processes, we will be processing your personal data based on your consent. The way we are also processing your personal data may also rely on our legitimate interest which allows us to optimise the process and find a suitable candidate.

Background screening and verification

- **Purpose:** To the extent permitted by applicable law and where relevant to the position, we and our authorised service providers may conduct background screening, verification, and related due diligence. The nature, scope, timing, and methods of any screening depend on the requirements of the position and on the legal and regulatory requirements of the relevant jurisdiction(s), including your country of residence, country of employment, and any other jurisdiction with a legitimate connection to the recruitment process. Where required by applicable law, we will provide any required notice and obtain any authorisation, consent, or other permission that may be required before conducting specific screening activities.
- **Data processed:** Identity information, contact information, professional information, and background information, as relevant and permitted for the specific screening being conducted.
- **Legal basis:** Where applicable law requires it, we will rely on your consent or on compliance with a legal obligation. Legitimate interest which allows us to find a suitable candidate.

Preparing your employment contract

- **Purpose:** If you are selected for a role, we use your data to prepare and finalise your employment contract. This includes verifying your identity and ensuring we comply with legal requirements.
- **Data processed:** Identification documents, contact information, and employment details.
- **Legal basis:** This processing is necessary to enter into and perform a contract with you. We also process this data to comply with our legal obligations, such as tax and employment laws.

Maintaining recruitment records

- **Purpose:** To keep records of our recruitment process, address any complaints or claims, and demonstrate how decisions were made. This helps us ensure fairness and transparency.
- **Data processed:** Identity information, application-related information, and electronic communication information.
- **Legal basis:** Legitimate interests to evidence how the process was conducted and optimize our future recruitments. It is necessary to carry out our legal obligations and rights in the field of employment.

Where we process your personal data with your consent, you can withdraw this consent at any time using the details provided in this notice.

Who we share your data with?

We limit access to your personal data to those who need it to carry out the recruitment process. This includes:

- **Internal recipients.** Your data is accessible to our HR team, hiring managers, and other authorised personnel involved in your recruitment. This may include colleagues based in Portugal, India, the United States, and France, who access your data through our Applicant Tracking System (ATS) as needed.
- **Service providers.** We use Deel, Inc., a US-based company, to host and operate our ATS platform. Deel processes your personal data strictly on our behalf and only for the purposes of the recruitment process. We have a data processing agreement in place with Deel to ensure your data is protected in accordance with applicable data protection laws.
- **Screening and verification providers.** Where appropriate, we may engage authorised third-party service providers, including Deel ATS and/or other recruitment, screening, verification, or professional services providers, to facilitate background screening activities on our behalf. Such providers are authorised to process personal data only as necessary to perform the services we request and in accordance with applicable legal requirements.
- **Other iBASIS entities.** We may share your personal data with other companies within the iBASIS group where necessary for the recruitment process, such as when a role is based in a different country or requires input from multiple teams. This sharing is done within the limits of applicable law.

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- **Authorities.** In some cases, we may be required to share your personal data with regulators, courts, or other competent authorities where this is required by law, regulation, or legal process. For example, we may need to disclose your data to tax authorities or employment regulators to comply with legal obligations.
- **Business transfers.** If iBASIS undergoes a merger, acquisition, or other business transfer, your personal data may be shared with the other company involved. We will ensure that any such transfer is carried out in accordance with applicable data protection laws.

We do not sell your personal data to third parties, and we only share it with external organisations when necessary for the purposes described in this notice.

International transfers of your data

As a global organisation, iBASIS operates in multiple countries, and your personal data may be transferred to and processed in countries outside the European Economic Area (EEA), including the United States and India. For example, your data is hosted within Deel's US-based environment and may be accessed by our HR teams in the United States and India as part of the recruitment process.

When we transfer your personal data internationally, we ensure that appropriate safeguards are in place to protect your data in accordance with applicable data protection laws. These safeguards may include:

- **Standard Contractual Clauses (SCCs).** We use SCCs approved by the European Commission to ensure that your data receives an adequate level of protection when transferred to countries outside the EEA. These clauses are legally binding agreements that require the recipient of your data to protect it to the same standard as under EU law.
- **Data processing agreements.** When we share your data with service providers like Deel, we put in place data processing agreements that require them to process your data only on our instructions and to implement appropriate security measures.
- **Additional safeguards.** Where necessary, we may implement additional measures to protect your data, such as encryption or pseudonymisation, to ensure it remains secure during and after transfer.

If you would like more information about the specific safeguards we have in place for international transfers, you can contact us using the details provided in this notice.

How long we keep your data?

We retain your personal data for as long as necessary to fulfil the purposes for which it was collected, unless a longer retention period is required by law. The retention periods for your data are as follows:

- **Application data.** We keep your application data, including your CV, interview notes, and feedback, for 12 months from the date of your application. After this period, your data will be

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deleted, unless you have given us your consent to retain it for longer (for example, to consider you for future opportunities) or we are legally required to keep it.

- **Employment data.** If you are hired, the personal data collected during your recruitment process will be transferred to your personnel file and retained for 5 years after the end of your employment. This includes data such as your job title, compensation, benefits, and employment history. We retain this data to comply with legal obligations, such as tax and employment laws, and to manage any potential disputes or claims.
- **Special category data.** If we process special category data about you (such as information about your health), we will retain it only for as long as necessary to fulfil the specific purpose for which it was collected.

We regularly review our retention periods to ensure they remain compliant with legal requirements and best practices. If you have any questions about how long we keep your data, you can contact us using the details provided in this notice.

Your rights as a data subject

Within the conditions/limitations set out in applicable law, you have the following privacy rights:

- **Right to information.** You have the right to obtain further information on our use of your personal data.
- **Right of access.** You have the right to receive a copy of your personal data.
- **Right to rectification.** You have the right to ask us to correct your personal data if it is incorrect or incomplete, such as by changing your details on your account.
- **Right to be forgotten (deletion).** You have the right to request the erasure of your data if we do no longer need them.
- **Right to restrict processing of personal data.** You have the right to request that we suspend our processing of your personal data.
- **Right to data portability.** You have the right to obtain personal data that you have provided to us in a format that enables you to transfer that personal data to another organisation. You may also have the right to have your personal data transferred directly from us to such organisation.
- **Right to object to processing of personal data.** You have the right to ask us to stop particular processing of your personal data.
- **Right to prevent automated decision making.** You have the right not to be subject to automated decision making.
- **Right to withdraw consent.** If you have given your consent to our processing of personal data, you are free to withdraw the consent at any time.
- **Other rights.** You may also be entitled to additional rights and remedies provided by your local applicable law.

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Please note that these rights are subject to conditions and limitations by law. Please contact us if you would like to exercise your rights (see below) or if you would like more information about the conditions/limitations. If you make a request, we will typically answer within one month.

If you find that we use your personal data in violation of applicable law, you may file a complaint with the relevant data protection authority. We encourage you to contact us prior to making such complaint, so that we may consider your objections and clarify any misunderstandings.

You may also designate an authorised agent to make a request on your behalf, which, for your protection, we will also need to verify as authentic.

Automated decision-making and profiling

iBASIS does not use automated decision-making or profiling to make decisions about your job application. All recruitment decisions, including whether to invite you for an interview or offer you a role, are made by our HR team and hiring managers based on their assessment of your skills, experience, and suitability for the position. We do not rely on algorithms, artificial intelligence, or automated systems to evaluate your application or make recruitment decisions.

If this changes in the future - for example, if we introduce automated tools to screen applications - we will update this notice to explain how these tools work, the logic involved, and the significance and consequences of the processing for you. We will also ensure that you have the right to request human intervention, express your point of view, and contest any automated decision.

Changes to this privacy notice

If we make changes to this Privacy Notice that affect your privacy, we will notify you by appropriate means, such as by publishing an updated version within our ATS platform.

Contact us

Should you need to exercise one of your rights or any additional information, you can contact us to the following address:

E-mail: dpo@iBASIS.net