

Finastra EEA & Switzerland Job Applicants Privacy Notice¹

May 2018

This Privacy Notice applies to job applicants residing in an EEA country or Switzerland, as well as those applying for a job position based in an EEA country or Switzerland. It tells you how Finastra Group (Turaz Global S.à r.l and its affiliates) ("Finastra", "we" or "us") processes the personal data you, or an external recruitment company on your behalf and under your instructions, submit as part of the application and selection process. It also describes your data protection rights, including a right to object to some of the processing which Finastra carries out. More information about your rights, and how to exercise them, is set out in the Your Rights section.

We may also provide you with additional information when we collect personal data, where we feel this would be helpful to provide relevant and timely information.

What data we collect

Finastra collects and processes the following types of personal data about you in connection with your job application.

- Contact details: such as your name, home address, email address, phone number;
- Information relating to your career: such as job history, academic background, qualifications, professional and personal competencies and skills, your job expectations;
- Information about your history of remuneration & benefits and your salary expectations;
- Information relating to your employment references (you will have ensured you have obtained consent from your references prior to providing us the information);
- Information collected as part of the hiring process such as assessments and aptitude tests. Any aptitude tests taken form part of the application process but are not solely determinative of your outcome or success.
- Identification information, as part of the pre-hiring process: such as copies of identification documents, immigration status, and where permitted, information concerning your race and ethnicity (for diversity monitoring purposes);
- Any other information you submit to us as part of the recruitment process.

Such data may be collected in different ways: it may be contained in your CV, in your application form, your identification document, or may be gathered from interviews or assessments you take during the recruitment process. In some cases, it may also be collected from third parties, for example when seeking employment references or if we receive details of a certification or training you obtained.

¹ As at May 2018, the European Economic Area is composed of: Iceland, Liechtenstein and Norway; as well as the EU countries: Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the UK.

We may also receive your CV from recruiters and the results of verification and vetting checks from background checking providers.

Unless specifically responding to a question asked by us please do not include any sensitive data as part of your application, i.e. information relating to your racial or ethnic origin, political opinions, religious beliefs, trade union membership, health status or sexuality, or information regarding criminal convictions. If we do require this information in connection with your application, this will be highlighted to you where we will obtain any necessary consents or acknowledgements.

Finastra is committed in leveraging each applicant skills and competencies to find the right match for a role in the organisation as opportunities arise.

If you are successfully hired, Finastra keeps this information for the course of the employment relationship and, to the extent permitted, after termination of employment. The protection of your data will then be governed by the applicable Finastra Employee data privacy notice.

If your application is not successful, we will keep your data during 12 months following the end of the recruitment process.

However, we believe it would be of your interest to be considered for additional job opportunities and/or recruitment hiring campaigns. To do so, we would ask for your explicit consent to retain your applicant record for a further period of 12 months which you can provide directly in your online application process. You can also update your data, or withdraw your consent at any time by contacting europerecruitment@finastra.com.

Why we collect, use and store personal data

Finastra processes this personal data for the following purposes:

- **As required to establish and perform the employment contract. This includes processing your application for a specific job**
- **Where necessary for Finastra's or another third party's legitimate interests, as listed below, and where these interests are not overridden by your data protection rights**
 - Administrating the recruitment process,
 - Managing the selection process, making appropriate employment offer,
 - Protecting our legitimate business interests and legal rights, and where permitted,
 - Where permitted, analysing and monitoring the diversity of the applicants, in accordance with applicable laws. This includes for example, compliance with equal opportunity employment laws,
 - Carrying out background checks to verify the details you have supplied during the recruitment process.

We have carried out balancing tests for all the data processing we carry out on the basis of legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details on the Contact Us section.

- **Where required by applicable laws**

Immigration documentation is processed to ensure the candidate is entitled to work on the territory where the job is located.

To comply with specific provisions of law concerning data processing at work or for reasons of substantial public interest as determined by local law.

- **Where you have given your consent:** For example, where permitted or required by local law and with your consent (to the extent required), we may also carry out criminal background checks to evaluate eligibility for employment or in circumstances where the nature of the job you apply for means that additional security measures are required (e.g. because you would have access to customer computer systems and other have access to customer confidential information or deal with company money). We also seek your consent in order to keep you in mind for future job opportunities within the Vista portfolio of companies. Where we ask for your consent, you are free to withhold or revoke it. However, in some cases, this may be a condition for further consideration of your application. We will let you know separately if these additional checks are applicable to you and provide you with further information on the process.

International Transfer

Personal data will be transferred to other Finastra entities, branches and service providers, including outside the EU and the UK (once the UK has ceased to be a member of the EU) and/or Switzerland to countries such as India, Canada, USA, or any country where Finastra has a registered local entity, and will be stored and processed manually and electronically through global systems and tools for the purposes above. Finastra has appropriate safeguards in place to protect this data, including standard contractual clauses. To obtain a copy of the document being used to protect your personal data, please contact us using the information in the Contact Us section below. Personal data will primarily be processed by employees of the HR, management line with a vacancy, legal, and IT, where relevant and necessary.

How your personal information is shared

We share some of your information with other members of the Finastra Group to administer and manage the recruitment process. We also share your information with any other group company to whom you make an application or with whom you communicate.

In addition, we share your personal information with our private equity sponsor, Vista Equity Partners, and its affiliates, including Vista Consulting Group (collectively, "Vista"), for administration, research, database development and business operation purposes, in line with the terms of this Privacy Policy. Vista processes your personal information on the basis of its legitimate interests in overseeing the recruitment processes and, if applicable, your employment relationship with Finastra. This may include transfers outside of the EU and the UK (once the UK has ceased to be a member of the EU) and/or Switzerland to countries such as the US or any country where Vista has an affiliate. Finastra has appropriate safeguards to protection this data including standard contractual clauses, a copy of which can be obtained using the information in the Contact Us section below.

If you consent to us doing so, we also share your personal information with other Vista portfolio companies for the purpose of being considered for other job opportunities in the pooling system, both inside and outside the EEA. Please find a full list of all Vista portfolio companies at: <https://www.vistaequitypartners.com/companies/>. You can provide your consent via your online application. You can also update your data, or withdraw your consent at any time by contacting europerecruitment@finastra.com.

Where this requires us to transfer your personal information outside of the EEA, please refer to Section International Transfer of this Privacy Policy for further details on cross-border transfers. In connection with the recruitment process, we may transfer your personal data outside of the EEA to Workday and Criteria Corp., which provide applicant tracking services and aptitude tests on our behalf. Workday and Criteria Corp. both comply with the EU-U.S. Privacy Shield Framework and ensure that your personal information is adequately protected whilst outside of the EEA.

Your personal data will also be shared with companies providing services under contract to the Finastra group such as IT hosting providers and, where applicable background checks providers. In addition, it may also be shared with government authorities, regulators and/or law enforcement officials if required for the purposes above, if mandated by law and if required for the legal protection of Finastra' legitimate interests in compliance with applicable laws.

How we protect your personal data

Finastra has taken appropriate technical, administrative, physical and procedural security measures, consistent with local and international information practices, to protect the personal data from misuse, unauthorized access or disclosure, loss, alteration, or destruction. These measures include:

Physical safeguards, such as locked doors and file cabinets, controlled access to our facilities, and secure destruction of media containing personal data.

Technology safeguards, such as use of anti-virus and endpoint protection software, passwords, encryption, and monitoring of our systems and data centres to ensure compliance with our security policies.

Organizational safeguards, through training and awareness programs on security and privacy, to ensure employees understand the importance and means by which they must protect personal data, as well as through privacy policies and policy standards that govern how Finastra treats personal data.

Your Rights

You have the right to ask Finastra for a copy of your personal data, to correct, delete or restrict processing of your personal data; and to obtain the personal data you provide in a structured, machine readable format. In addition, you can object to the processing of your personal data in some circumstances (in particular where we don't have to process the data to meet a contractual or other legal requirement). Where we have asked for your consent, you may withdraw consent at any time. If you ask to withdraw your consent to Finastra processing your personal data, this will not affect any processing which has already taken place at that time. There are exceptions to these rights so that access may be denied, for example, if making the information available would reveal personal information about another person or if Finastra is legally prevented from disclosing such information. Relevant exemptions are included in both the GDPR and in local data protection laws. We will inform you of relevant exemptions we rely upon when responding to any request you make.

If you have unresolved concerns, you have the right to complain to the data protection authority. You may also be able to seek a remedy through the courts if you believe that your rights have been breached.

It is important that we maintain up to date records of key information on you. Please notify europerecruitment@finastra.com of any changes in your personal circumstances as soon as they occur (eg change of address).

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage the recruitment process, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional. However, we may not be able to process your application properly

Updates to this Privacy Notice

This Privacy Notice may be updated periodically. We will update the date at the top of this Privacy Notice accordingly. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Privacy Notice as required by applicable law.

Contact us

The data controllers for your personal data will be the Finastra company where the vacant job is located (<https://www.finastra.com/contact>) and Finastra Romania: Finastra – Misys International Financial Systems SRL - Recruitment Department - S.C. Fino Capital S.R.L. J40/18662/2006 Splaiul Independentei No. 319G, Riverview House, 6th-7th floor, Sector 6, Bucharest,].

If you have questions about this Privacy Notice or wish to contact us for any reason in relation to our personal data processing, please contact the Privacy Department at privacy@finastra.com or the Finastra Human Resources Privacy Champion, Mirela Vasile (mirela.vasile@finastra.com).
