

## Recruitment Policy



This policy is designed to outline the Recruiting Policy of KBACE Technologies, Inc and how it collects and uses your personal information in connection with the ATS (Applicant Tracking System) and KBACE's recruiting efforts, both online and offline. This policy describes the broadest potential use of personal information.

Your provision of personal information in connection with the recruiting or job application process confirms your consent for KBACE to collect that information and to use, transfer, retain and share it with third parties as specified in this policy.

**Collecting Personal Information** - You may provide personal information to KBACE as it asks for certain data, including educational and employment background, contact information and preferences, job qualifications, and jobs for which you would like to submit an application. You also may choose to provide KBACE additional information, such as your resume, or transcripts; employment references and related information; and compensation requests. In addition, KBACE may collect information from third parties, e.g., in connection with a background or employment check and/or an employment reference.

KBACE's web site, including its Applicant Tracking System (ATS), may use cookies and other electronic communication protocols. For further information, please consult the KBACE Privacy Policy.

**Sensitive Personal Information** - KBACE does not request or require sensitive personal information concerning religion, health, sexual orientation, or political affiliation in connection with recruiting. If you have a disability and would like KBACE to consider any reasonable accommodations, you may provide that information during the recruiting process. As well, in some countries we ask for information such as race or ethnicity for the purpose of monitoring equal opportunity; however, we do not require applicants to provide race or ethnicity information, and if you provide this information it will not be viewable in the hiring or selection process.

To the extent information you provide contains details of your racial or ethnic origin; political opinions or beliefs; religious beliefs; membership in a trade union or political party; physical or mental health or condition; sexual orientation; commission or alleged commission of an illegal offense or related proceedings; job evaluations or educational records, you expressly authorize KBACE to handle such details as specified in this policy. We encourage all candidates not to provide details unrelated to professional attributes related to the qualification of employment of KBACE Technologies, Inc.

**Voluntary Disclosure** - Your provision of personal information in connection with recruiting is voluntary, and you determine the extent of information you provide to KBACE; please note that if you decide not to provide information, it may affect our ability to consider you for employment.

**Using Personal Information** - The information may be used to communicate with you, to manage KBACE'S recruiting and hiring processes, and for compliance with corporate governance and legal and regulatory requirements. If you are hired, the information may be used in connection with employment and corporate management.



**International Transfer** - Due to the global nature of KBACE and its operations, your personal information may be stored, accessed, transferred or processed in countries globally, including the United States.

**Data Recipients and Sharing with Third Parties** - KBACE may share your personal information internally and with service providers and other third parties as necessary in connection with recruiting, employment, corporate governance, acquisitions and legal or regulatory requirements. KBACE requires that its service providers and such other third parties keep your personal information confidential and that they only use the personal information in furtherance of the specific purpose for which it was disclosed. KBACE and its service providers may use your personal information in an anonymized format (in a form in which your identity cannot be determined) for other purposes not specified above, including in the development and testing of products and services.

**Security and Confidentiality** - Except as otherwise stated in this policy or as required for legal or regulatory purposes, KBACE treats your personal information as confidential and will not disclose it to third parties without your consent. KBACE maintains, and requires its services providers to maintain, reasonable administrative, physical, and technical controls designed to protect the confidentiality and security of your personal information. KBACE employees who may have access to personal information are required to keep that information confidential.

KBACE may employ security procedures at its facilities and on its computer systems to monitor and maintain security, including the use of closed circuit television. Any monitoring of KBACE facilities, systems or assets is performed in accordance with applicable law.

**Retention and Access** - KBACE may retain your information to consider you for other job opportunities. To the extent permitted or required by law, KBACE may delete data at any time; accordingly, you should retain your own copy of any information you submit to us.

You may access and correct personal information you have submitted online using the KBACE Applicant Tracking System (ATS) and may submit other requests by email to [privacy@kbace.com](mailto:privacy@kbace.com) or by mail to: 6 Trafalgar Square, Nashua, NH 03063, Attn: Privacy Officer.

**Your Responsibilities** - You are responsible for the information you provide or make available to KBACE, and you must ensure it is honest, truthful, accurate and not misleading in any way. You must ensure that the information provided does not contain material that is obscene, defamatory, or infringing on any rights of any third party; does not contain malicious code; and is not otherwise legally actionable. Further, if you provide any information concerning any other person, such as individuals you provide as references, you are responsible for providing any notices and obtaining any consents necessary for KBACE to collect and use that information as described in this policy.

**General** - KBACE may update this policy from time to time, and the current version will be available by KBACE at a candidate's request. If you have any questions or concerns about this policy or its application, or if you believe your personal information has been used in a way that is not consistent with this policy or your specified preferences, please contact us by email at [privacy@kbace.com](mailto:privacy@kbace.com), or by mail at: 6 Trafalgar Square, Nashua, NH 03063, Attn: Privacy Officer.

KBACE Corporate Headquarters are located at:

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