

NOTICE ON THE PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

This Notice on the Processing of Personal Data (hereinafter: the "**Notice**") applies to the processing of personal data of job applicants and internship candidates (hereinafter: the "**candidate**") by The Productive Company d.o.o., having its registered seat in Rijeka, Labinska 4, Personal Identification Number (OIB): 25790097371 (hereinafter: "**Productive**").

The purpose of this Notice is to inform you about how and why we process your personal data during the recruitment process, the legal basis for processing such data, how we manage it, as well as what rights you can exercise in this regard.

Productive acts as the data controller and respects individual privacy and values the trust of its candidates. The processing of personal data is carried out in accordance with applicable data protection regulations, primarily the General Data Protection Regulation (hereinafter: the „**GDPR**“) and relevant Croatian laws.

For any questions related to the processing of your personal data, you can contact us at:

The Productive Company d.o.o.
Labinska 4
51000 Rijeka
Email: office@productive.io

1. What personal data do we collect and process?

Productive collects the following categories of personal data from candidates:

- **Identification data** – your full name, contact information (including home address, phone number, mobile number, email address), date and place of birth, gender, and languages spoken;
- **Professional data** – proof of the appropriate level of education (copy of diploma, certificate of completed course, etc.), proof of work experience in appropriate jobs, etc.
- **Curriculum vitae (CV) and additionally provided information** – Productive may process your CV and other relevant data you have provided in your CV, cover letter, open application for employment;
- **Information about references**
- **Photographs** – of the candidates who submit them during the application process (submission of a photo is not mandatory)

In some cases, it is possible to achieve the processing purpose with fewer data than listed above, since we collect only data necessary to achieve a specific purpose.

Productive does not generally collect special categories of personal data from candidates.

2. For what purposes do we process your personal data?

Productive processes candidate personal data exclusively for recruitment purposes as follows:

- **Candidate selection** – application data, CV, qualifications, and work experience serve so that we may verify whether candidates meet the requested conditions, i.e. whether they are capable of performing the tasks for the specific job for which the selection procedure is carried out. In that procedure we may apply testing (including psychological testing) or interviews to assess knowledge, skills, and competencies. On the basis of those assessments we decide who best fits the relevant position.

- **Communication after application** – we use personal data to contact candidates and inform them about the progress of the selection procedure. Identification and contact data enable us to confirm receipt of applications and inform candidates about status and possible next steps.
- **Preparation for concluding an employment contract** – if a candidate is selected, we will use their data to undertake the steps preceding the conclusion of the employment contract, such as preparing the contract and arranging the start of work. On the other hand, the data of candidates who are not selected may, with their consent, be retained so as to contact them in future recruitments.
- **Fulfilling legal obligations** – in certain situations we may process candidate data in order to fulfill obligations prescribed by laws and other regulations pertaining to human resources management. This includes keeping legally required records, preventing discrimination, and all other obligations arising from law and applicable legal provisions. In that context we may forward data to competent state authorities or supervisory bodies if required.
- **Future employment** – if a candidate is not selected, we will retain and use their data only with their consent, and solely for potential future employment. Candidates may at any time withdraw consent and request deletion of their data.

3. On what legal basis do we process candidates' personal data?

Processing of personal data for the above purposes is possible only when there is an appropriate legal basis. Candidate personal data are collected and processed in accordance with the following legal bases:

- Pre-contractual actions for concluding and executing an employment contract (Article 6(1)(b) GDPR);
- Consent (Article 6(1)(a) of the GDPR);
- Legitimate interest (Article 6(1)(f) of the GDPR).

Productive primarily processes personal data of candidates on presumed consent, given that it is assumed they voluntarily provide their personal data for the purpose of applying to the job advertisement, undergoing the selection process, and possible further employment.

4. Use of AI Notetaker During the Recruitment Process

As part of the recruitment process, Productive may use an AI notetaker to automatically record and transcribe interviews/conversations with candidates without the need for manual notetaking. The purpose of such processing is to ensure that the content of the interview/conversation is accurately documented, allowing us to objectively assess competencies and gain better insight into a candidate's qualifications.

If an AI notetaker is used, the following candidate data may be processed during the recording: the candidate's name and surname, the position they are applying for, the stage of the recruitment process, audio and/or video recordings of the interview, transcripts, summaries of the interview, and notes related to the recruitment process.

The legal basis for this processing lies in our legitimate interest in conducting interviews with candidates in the most transparent and efficient manner and in making well-informed hiring decisions. AI notetaker helps reduce the risk of errors and bias, particularly in cases involving a large number of interviews, as the conversation is fully documented and analysed according to consistent criteria, thereby reducing interviewer subjectivity. Furthermore, the interviewer can focus entirely on engaging with the candidate instead of taking notes, which contributes to a smoother interview flow and a more objective recruitment decision.

In addition to the above, Productive also collects the candidate's consent for the use of an AI notetaker during interviews. Candidates may freely grant or refuse consent. If consent is not given, this will not negatively affect the candidate's recruitment process and in such cases, notes will be taken manually.

Productive uses its own AI Notetaker solution to record and transcribe interviews with candidates. Audio is processed through a third-party service provider, Recall (Hyperdoc Inc.), which acts as Productive's data processor for the purpose of audio recording and speech-to-text transcription. Productive has entered into a data processing agreement with Recall to ensure an adequate level of protection and security measures. All interview data is processed and stored exclusively on servers located within the European Union. Audio recordings and transcripts are not used to train or improve AI models, whether by Productive or by any third-party provider involved in the processing.

Recordings and transcripts are retained only for as long as necessary to complete the recruitment process, after which they are deleted within 30 days. Candidates have the right to request access to the recordings and transcripts, the correction of inaccurate data, and the deletion of recordings.

5. Who has access to candidates' personal data?

Access to candidates' personal data is granted only to Productive employees involved in the recruitment process whose access rights and responsibilities correspond to their role descriptions. Individuals within Productive who are authorized to access or otherwise process candidate personal data are obliged to maintain confidentiality and act in accordance with internal privacy notices, policies, procedures, other general employer acts, and the contractual obligations they have with Productive as their employer.

In addition to internally authorized staff, certain service providers, such as IT support or software solutions like the AI notetaker, may also have access to certain data. If necessary for the conclusion of an employment contract or to comply with legal obligations, candidate personal data may be disclosed to other recipients, such as the Croatian Employment Service or similar institutions. In such cases, Productive has entered into agreements with the relevant third parties to ensure appropriate technical and organizational measures are in place for the protection of candidates' personal data.

In certain situations, candidates' data may be transferred to countries outside the European Union and the European Economic Area, where data protection rules may not necessarily be equivalent to those in the Republic of Croatia. In such cases, we will implement additional safeguards, including contracts based on the European Commission's Standard Contractual Clauses, to ensure an adequate level of data security and protection.

6. How long is candidate data retained?

Productive retains candidate personal data only for as long as is necessary to achieve the purposes described above. Data collected during a standard recruitment process is stored until the selection is completed and an employment contract is signed with the chosen candidate, but no longer than 30 days after the process ends. If a candidate submits an open application outside of a specific job posting, their personal data will be retained for a maximum of 6 months from the date of receipt of such application.

If a candidate provides consent, Productive may retain their data for up to 60 months after the conclusion of the recruitment process in order to include them in future recruitment opportunities and contact them regarding possible employment. In the event consent is withdrawn, we will delete the candidate's personal data unless another legal basis for processing exists or unless processing is necessary for the establishment, exercise, or defense of legal claims.

7. How is candidate data protected?

To protect candidate personal data, Productive implements appropriate security measures in compliance with applicable privacy and data protection laws. We also require our service providers to establish suitable technical and organizational measures to safeguard the confidentiality and security of recruitment data. In our daily operations, we apply technical, physical, and organizational safeguards to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

8. What are the candidates' rights and how can they be exercised?

Candidates have the following rights regarding their personal data:

- the right to access their personal data, including confirmation of whether such data is being processed, as well as the right to a copy and additional information regarding processing;
- the right to rectification of inaccurate or incomplete data;
- the right to erasure of data, particularly when they are no longer necessary for the purpose for which they were collected, or if consent has been withdrawn, or where deletion is required by law;
- the right to restrict processing in certain cases;
- the right to object to the processing of personal data;
- the right to lodge a complaint with the competent data protection authority.

Productive will enable the exercise of these rights; however, in certain cases, these rights may be limited or excluded in accordance with the GDPR or other applicable legislation.

9. Whom can you contact with inquiries about personal data protection?

For any additional information regarding the processing of candidate personal data, you may contact Productive by sending an email to our data protection address or by submitting a written inquiry to our business address. Contact details: careers@productive.io.

10. Amendments to the notice and consolidated version

This Notice is effective as of 6th of October 2025 and may be updated from time to time. Any revised and consolidated version of the notice will be published on Productive's official website and will be deemed authoritative with respect to the processing of candidate personal data.