

## **CANDIDATE PRIVACY NOTICE**

Onni is committed to compliance with applicable privacy laws.

This Candidate Privacy Notice (“Notice”) informs applicants of how Onni collects, uses, shares and retains their personal information.

### **PERSONAL INFORMATION DEFINITION**

In this Notice, “personal information” refers to any information about an identifiable individual, including information that could be used, together with other information, to identify an individual.

Onni collects, uses and discloses the personal information necessary to establish, manage and terminate an applicant’s relationship with Onni or to operate its business.

### **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

In connection with your application to work with us, we will collect, store and use the following categories of personal data about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, telephone number, email address and eligibility to work.
- Any supplementary information that you may provide to us electronically.
- Any information you provide to us during an interview.

### **HOW IS YOUR PERSONAL DATA COLLECTED?**

We may collect personal information about candidates from some or all of the following sources:

- You, the candidate.
- Your named referees, from whom we collect information specific to job-related performance, qualifications and skills.
- In some circumstances we may collect personal information from a public accessible source, which may include, but is not limited to, LinkedIn.
- We may collect personal information from other third parties, for example where criminal record checks or other background checks are required in order to process your application for employment.

### **HOW WE WILL USE PERSONAL INFORMATION ABOUT YOU?**

We will use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the role.

- Carry out criminal record or other background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Consider any requests for accommodation as part of the application process.
- Process offers of employment, where applicable.
- Keep records related to our hiring processes.
- If you are hired, maintain personnel records and manage your employment in keeping with applicable law and our policies.
- Comply with legal or regulatory requirements.

## **IF YOU FAIL TO PROVIDE PERSONAL INFORMATION**

If you fail when requested to provide information which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application expeditiously or at all. For example, if we require references for a role and you fail to provide us with relevant details, we will not be able to take your application further.

## **INFORMATION ABOUT CRIMINAL RECORD AND OTHER BACKGROUND CHECKS**

We may process information about any of your criminal record, credit history or conduct other background checks to the extent required or permissible under applicable law. Where required by law to do so, we will obtain your consent to collect and process such information.

## **SHARING OF PERSONAL INFORMATION**

We may share personal information with third party service providers for the purpose of processing your application. All affiliates and any third-party service providers with whom we share your personal information are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

You may be provided with privacy notices by third parties, such as Onni's background-screening provider, in the course of your application. We encourage you to read their privacy notices for further information about the pertinent legal guidelines and how your personal information is handled by them.

## **DATA SECURITY**

Onni has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those

employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **CROSS-BORDER TRANSFER OF PERSONAL INFORMATION**

Your personal information will be processed and stored outside of Canada, and therefore may be available to government authorities under lawful orders and laws applicable in such foreign jurisdictions.

## **DATA RETENTION**

We will retain your personal information for the time period required in order to satisfy the purpose for which it was collected, and as otherwise required or authorized by applicable law.

If you wish us to retain your personal information on file, on the basis that a further opportunity may arise in future, please let us know, in which case, we will retain your details for a fixed period on that basis.

## **CONSENT**

By submitting your application to Onni, you consent to the collection, use and disclosure of your personal information in accordance with this Privacy Notice. You have the right to withdraw your consent subject to restrictions in applicable law. To withdraw your consent, please contact [privacy@onni.com](mailto:privacy@onni.com). Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal information securely.

## **RIGHTS OF ACCESS, CORRECTION/ANNOTATION**

Applicants must provide Onni with accurate and complete personal information and must update their personal information held by Onni promptly after any change to the information.

Applicants have the right to request information about, and access to, their personal information held by Onni, and may request that the personal information be amended if it is inaccurate or incomplete, subject to various exceptions provided by applicable law (including when access must be denied to protect other individuals and to protect Onni's privileged or confidential information).

Requests for correction, annotation or access may be directed to [privacy@onni.com](mailto:privacy@onni.com).

Onni regularly reviews all of its policies and procedures and we may change this Notice from time to time. You may login to your account to view updates.

**If you have further questions or concerns about this Notice you may contact:**

Chief Privacy Officer  
 Onni Group of Companies  
 200-1010 Seymour Street, Vancouver, BC V6B 3M6  
 By phone: 604-602-7711  
 By e-mail: [legal@onni.com](mailto:legal@onni.com)

**ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS**

If you are a resident of California, USA, the California Consumer Privacy Act of 2018, as updated and amended (“CCPA”) requires certain notices and provides specific rights regarding the collection of your personal information.

**PERSONAL INFORMATION WE COLLECT**

We collect the following categories of personal information about you:

Category	Examples
A. Identifiers.	Name, alias, postal address, Internet Protocol address, email address, account name, Social Security number, driver's licence number, passport number, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's licence or state identification card number, education, employment, employment history, bank account number, or medical information.
C. Protected classification characteristics under California or federal law.	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.
I. Professional or employment-related information.	Current or past employment verification.

<p>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</p>	<p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, or student disciplinary records.</p>
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We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from you.** For example, from forms you complete in-person or on the website.
- **Indirectly from you.** For example, from observing your actions on our website such as website clicks and content and page views. We may also collect your IP address and other online identifiers.
- **From third parties.** For example, from the references you provide.
- **From publicly available sources,** but only in a manner and to the extent permissible under applicable law.

#### **HOW WE USE THE PERSONAL INFORMATION WE COLLECT?**

We will use the personal information we collect about you for the purposes set forth above under “HOW WE WILL USE INFORMATION ABOUT YOU and “INFORMATION ABOUT CRIMINAL RECORD AND OTHER BACKGROUND CHECKS.”

Note that some of the personal information we may collect about you is considered sensitive personal information under the CCPA. This information includes, but is not limited to, your social security number, driver’s license, racial or ethnic origin, religious or philosophical beliefs, sexual orientation, and information about your health. We collect this information to comply with legal or regulatory requirements, to ensure meaningful equal opportunity monitoring and reporting and, in certain circumstances, to provide appropriate adjustments or accommodations during the recruitment process and to plan possible employment accommodations.