

Candidate Privacy Notice

Last updated: 22 April 2026

1. Introduction

Capital.com (hereinafter the “**Company**”, “**we**”, “**Capital Com**”) respect your privacy.

This Candidate Privacy Notice (the “**Notice**”) outlines how the Company handles Personal Data of individuals whose information is collected and processed with respect to its recruitment activities. It applies to candidates who submit their Personal Data for the vacant positions at the Company either directly through the Capital Com careers portal, or through different services or recruitment agencies (“**Candidates**”).

We have prepared this Notice in compliance with applicable data protection legislations in the jurisdictions we operate.

Should you have any question or concern regarding your Personal Data please email our appointed Data Protection Officer at dpo@capital.com or our recruitment team at talent@capital.com.

2. Who we are

Capital Com is a fintech group of companies licensed and regulated in several jurisdictions. The Capital company you are applying to determines what personal data is collected and how it is used. In some countries, this entity is referred to as the “controller.” If you want to learn which Capital Com entity is a data controller for you as a Candidate, please contact us at talent@capital.com.

3. What is Personal Data and what is the processing of Personal Data?

“**Personal Data**” is any information relating to you and that alone, or in combination, with other pieces of information gives the opportunity to a person that collects and processes such information to identify you as an individual. The Company is required to process your Personal Data for the recruitment process.

This data is predominantly data that you provide to us directly or via recruitment agency when you apply for a position at our Company by completing our application forms, sharing your CV or otherwise corresponding with us / recruitment agency. It also includes information you share on job search portals/social networks. In certain instances, we may receive information about you through referrals from current employees.

Meanwhile, the processing of Personal Data is defined as any action taken upon your data, either manually or through automation. It includes, but is not limited to, the collection, recording, organisation, structuring, storage, use, erasure, restriction, and disclosure by any means.

4. What is the legal basis for processing?

Capital Com will process your Personal Data only when there is a lawful basis. Specifically, we process your Personal Data in the event one or more of the following cases is satisfied.

In jurisdictions where consent is not the primary legal basis for processing the Company collects and processes the Personal Data of Candidates pursuant to:

- Our legitimate interests (Article 6(1)(f) GDPR or equivalent), such as recruitment process management, assessment and confirmation of the Candidates' suitability for the vacant positions, and decision-making to whom to offer a position. Please note that the achievement of the aforementioned legitimate purposes is in the best interests of your application;
- The necessity of processing for the performance of steps at your request prior to entering into an employment contract (Article 6(1)(b) GDPR or equivalent).

By submitting your application, you acknowledge that the processing of the Personal Data you provide is necessary for us to evaluate your suitability for the role and manage the recruitment process. This processing does not require your consent, as it is based on the lawful bases described above.

Certain processing activities go beyond what is strictly necessary for the core recruitment purpose. For these, we will seek your specific, informed consent separately. These include:

- Recording of interviews (you will be asked for consent before any recording begins, and your refusal will not affect your application);
- Conducting background or criminal record checks in jurisdictions where explicit consent is required by law;
- Processing of special category data where explicit consent is the applicable condition.

You may withdraw any of these consents at any time without affecting the lawfulness of processing carried out before withdrawal.

In jurisdictions where consent is the primary legal basis for processing recruitment data, by submitting your application through our careers portal, a recruitment agency, or by otherwise providing your Personal Data to us in connection with a job vacancy, you consent to the processing of your Personal Data for the recruitment purposes described in this Notice.

This consent covers: the collection, use, and storage of your Personal Data for the purpose of evaluating your suitability for the role applied for; managing the recruitment process including scheduling interviews and communicating with you; verifying the information you have provided; and sharing your data with the third-party service providers described in this Notice.

You may withdraw your consent at any time by contacting us at talent@capital.com. Please note that if you withdraw consent to processing that is necessary for us to evaluate your application, we may be unable to continue considering you for the role.

We will use information obtained from you as a Candidate to make a decision regarding your recruitment, or appointment, and to determine the terms upon which you will be employed for or with us.

If you fail to provide information when requested, which is necessary for us to consider your application, we will not be able to process your application successfully.

5. What kind of Personal Data do we collect?

We may collect your Personal Data:

- Directly from you, for example, when you apply for a position at Capital Com;
- From third parties such as recruitment agencies;
- From publicly available sources of information (such as LinkedIn);
- From background check providers (if applicable).

Capital Com collects a range of information about you. We collect the following recruitment information from our Candidates:

- Identification data such as name and surname;
- Contact details such as email address and other contact information provided by the Candidate;

- Information contained in the CV, including work experience, education, qualifications, skills and professional background;
- Information included in a cover letter or otherwise voluntarily provided by the Candidate;
- Records, summaries and transcripts of interviews conducted during the recruitment process;
- Evaluation scores, competency assessments, behavioural analysis results, fraud and cheat detection flags;
- Results of test assessments and other evaluation materials used to assess suitability for the role;
- Reference checks and background checks (applicable only to selected roles, such as managerial or positions requiring enhanced verification);
- Salary expectations and remuneration-related information provided by the Candidate;
- Any other personal data voluntarily disclosed by the Candidate during the recruitment process.

The Company will collect your Personal Data through the CVs, resumes, and cover letters submitted by you. Additionally, the Company will collect your Personal Data through interviews, or other forms of assessment that may be conducted. In certain cases, we may record candidate interviews, provided that we have obtained prior consent.

6. Purposes of processing your Personal Data

We process your Personal Data for the following purposes:

- Assessing suitability for a role, including reviewing CVs, applications, portfolios, and interview feedback.
- Managing the recruitment process, such as scheduling interviews, communicating with candidates, and maintaining recruitment records.
- Verifying information provided by candidates, including employment history, education, qualifications, and references.

- Conducting background and screening checks.
- Evaluating skills and competencies, including through tests, assignments, or assessments.

7. Use of AI-Powered Tools

During our recruitment process, you may interact with or be assessed by AI systems. Specifically, for certain roles, Capital Com uses an AI-powered recruitment tool to conduct structured first-stage video interviews. Where allowed by the law, we rely on our legitimate interests as our lawful basis for AI-conducted interviewing.

Where an AI system is used, the recruitment tool may apply automated fraud and integrity detection measures. This may involve analysis of technical and behavioural data, including IP address, device identifiers, browser and session data, and behavioural signals such as tab-switching or focus loss. This data is used solely to detect cheating or impersonation and plays no role in evaluating your suitability for the role. We rely on our legitimate interests in maintaining a fair assessment process as the lawful basis for this processing.

In addition, our recruitment team may use AI-assisted tools to support the assessment process. These tools are used by recruiters (not by candidates directly) and may include: interview recording and transcription services that generate text transcripts of your interview for recruiter review; and AI-powered analysis tools that compare your CV and interview responses against job requirements. These tools process text data only (CVs and transcripts) and do not analyse video or audio content. All outputs are reviewed by a member of our recruitment team and serve as decision-support only.

No decision about your application will be made by the AI alone. All AI outputs and recommendations made by the tool are reviewed by a member of our recruitment team before any decision is made to progress or reject your application.

Because we rely on legitimate interests for this processing, you have the right to object to your personal data being processed using AI tools at any stage. If you wish to object, please contact us at talent@capital.com. We may offer an alternative pathway through the recruitment process that does not involve AI interviewing.

8. How do we share information?

Your information may be shared internally for recruitment purposes. This includes members of the HR and recruitment team of Capital Com, interviewers involved in the recruitment process,

managers in the business area with a vacancy. We may also share Your Personal Data internally with other Capital Com staff, e.g. with IT, legal, accounting team members, if access to your Personal Data is necessary for the performance of their roles.

We may share your Personal Data with other companies that fall within the Capital Com group, for example for recruitment purposes, human resource, IT, accounting and other management and internal reporting.

We also engage third-party service providers to support and manage certain aspects of our recruitment and talent management activities. These providers process personal data on our behalf and in accordance with our instructions, subject to appropriate data processing agreements and security safeguards.

The categories of service providers we use include:

- Applicant tracking system providers used to manage recruitment applications and candidate data;
- Human resources information system providers used to manage workforce and talent-related data;
- Talent assessment service providers used to conduct and manage skills tests and candidate evaluations;
- Providers of AI-assisted recruitment software and interview management tools, including video conferencing and interview recording used to facilitate remote interviews and support recruitment processes.

These service providers act as processors (or equivalent under applicable law) and process personal data solely for the purposes of supporting our recruitment operations.

As part of our global operations, we may transfer, store, or otherwise process your Personal Data in countries other than the country in which you reside. The data protection and privacy laws in those countries may differ from those in your jurisdiction and may not provide the same level of protection.

In case your Personal Data is provided to Capital Com entities and/or service providers outside your jurisdiction, we will implement appropriate safeguards to protect your Personal Data and ensure that the transferred Personal Data will be accorded a standard of protection that is comparable to that in your jurisdiction. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of your jurisdiction.

Moreover, Capital Com requires its service providers to implement appropriate security measures to ensure the protection of your Personal Data in accordance with applicable data protection legislation.

9. How long do we store Personal Data?

(1) If your application is not successful

If your application is unsuccessful, we will retain your personal data for a reasonable period of time, typically three (3) to six (6) months from the date we inform you of the outcome of your application. We retain your data to keep you in mind for current or future roles, and for record-keeping.

After the applicable retention period expires, your personal data will be deleted or anonymised in accordance with our data retention practices.

(2) If your application is successful

If your application for a job vacancy is successful, all Personal Data gathered during the recruitment process will be transferred to your personnel file and retained for the duration of your employment with the Company.

10. Your rights regarding your Personal Data

With regard to the Personal Data we collect and process about you, you may have certain rights. The extent of the rights available to you depends on the laws that apply to the processing of your Personal Data. Generally, you may have a right to:

- Access your Personal Data processed by Capital Com;
- Correct your Personal Data;
- Withdraw consent and remove your Personal Data we collected on the basis of your consent;
- Obtain restriction of processing, for instance, where you contest the accuracy of your Personal Data for a period enabling us to verify the accuracy of the Personal Data;
- Have your Personal Data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others;

- Request from Capital Com to erase Personal Data as long as its processing is no longer necessary for why it was actually collected. The same should happen if we do not have legal grounds for the processing anymore. In most cases, the Company will erase it unless otherwise required by legislation;
- Object the processing of your Personal Data by Capital Com if we process your Personal Data for the purposes of the legitimate interests pursued by us or by a third party and you believe that such interests are overridden by your interests or fundamental rights and freedoms. If you make a request with an objection to processing, we will no longer process the Personal Data unless we are able to demonstrate compelling legitimate grounds for the processing;
- Lodge a complaint with a competent data protection supervisory authority if they believe that the processing of their personal data infringes applicable data protection laws.

Any requests to exercise your rights can be directed to the Company to our Data Protection Officer at dpo@capital.com or our recruitment team at talent@capital.com. These requests are usually free of charge subject to certain exceptions as provided by the applicable laws.

11. Other privacy commitments

(1) Time for reply and reaction

The Company will provide information on action taken on your request related to your rights specified above within one month of receipt of the request. That period may be extended by two further months if the request is complex, or if Capital Com is in the process of resolving a large number of requests. We will inform you if any such extension is required within one month of receipt of the request, together with the reasons for the delay.

If you have doubts as to our reply, reaction, or the absence of such, you have the right to lodge a complaint with a supervisory authority that is responsible for processing such complaints in your jurisdiction.

(2) Security

The Company uses technical and organisational measures to ensure the information is processed in a manner that ensures appropriate security of information, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage. For example, the Company ensures that any third party providers, which may have access to the

Personal Data, are assessed, verified, made party to data processing agreements as appropriate.

Your Capital Com Team

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