

# Candidate Privacy Notice

## Introduction

The Revolut entities listed at Schedule 1 (*Revolut Employers*) ("**Revolut**", "**we**", "**our**" or "**us**") provide this notice to you because you are applying to work with us as an employee, worker or contractor.

This notice sets out the basis on which we will process your personal data. Please read it carefully to understand our practices regarding your personal data and how we will use it.

## About Us

Revolut is the controller of the personal data of prospective employees, workers and contractors, and is subject to applicable data protection laws.

If you have any questions about this notice or your personal data, or wish to exercise any of your rights as described in this notice or under applicable data protection laws, you can contact Revolut's Data Protection Officer through [dpo@revolut.com](mailto:dpo@revolut.com).

## What types of personal data are protected?

### **Personal data**

This notice applies to your "personal data". This is any information relating to you as an identified or identifiable person.

### **'Special categories of personal data' (United Kingdom (UK) and European Economic Area (EEA) countries) or 'sensitive personal data' in other countries**

Within the broad range of information which can be personal data, information revealing the following characteristics are considered "special categories of personal data" in the UK and EEA and are therefore subject to a greater degree of protection:

- physical or mental health;
- racial or ethnic origin;
- political opinions;
- trade union membership;
- religious or philosophical beliefs;

- sexuality or sexual life; and
- genetic and biometric data.

Outside of the UK and EEA, other types of sensitive personal data, in addition to the “special categories of data” mentioned above, may include:

- social status;
- criminal history;
- membership of a professional or trade association;
- social security numbers;
- bank account information; and
- financial data.

## What personal data we collect

### **Personal data you give us**

You may give us personal data about you by filling in forms online, corresponding with us by phone, email, in person, or otherwise, or through a recruitment agency or other third party.

### **Personal data we collect from you**

The personal data that we collect about you includes, but is not limited to, the following:

- your name;
- home address;
- contact details (such as telephone number and email address);
- date of birth;
- gender;
- marital status;
- your image or a recording of you;
- copies of your passport, driving licence and similar documents;
- education history (including copies of relevant degrees, diplomas or certificates if required), training and professional experience;
- current and past employment details;
- immigration status and work permits;
- languages spoken and level of proficiency;
- psychometric test results;
- criminal record information (where required or permitted by local laws);
- information required to prepare the employment contract;
- other information given in your CV;

- interview notes and recordings;
- diversity information (such as information about your race or ethnicity); and
- information about your health, such as any disability you might have.

## Personal data provided by third parties

We collect most of the personal data described in Section 4 from you directly. However, we may also collect personal data about you from third parties, including:

- recruitment agencies;
- existing Revolut employees who refer or nominate you for roles with us;
- governmental authorities (such as local tax authorities);
- your named referees who you've asked to provide us with references;
- where allowed by law, third-party background screening providers, credit reference agencies, fraud prevention agencies, sanction screening and criminal convictions screening agencies; and
- where allowed by law, other publicly available sources, such as social media networking sites (such as LinkedIn, Instagram and Twitter).

## Data relating to criminal convictions and offences

Where required and allowed by law, we also collect and store personal data relating to criminal convictions and offences. In cases where we need to identify a lawful basis for such processing, then, depending on local laws, such processing is carried out with your consent, to comply with our legal obligations or on the basis of our legitimate interests (to ensure we hire suitable candidates). This data is only processed where it is necessary for the purposes of:

- complying with or assisting other persons to comply with a regulatory requirement which involves Revolut taking steps to establish whether you have committed an unlawful act or been involved in dishonesty, malpractice or other seriously improper conduct;
- preventing or detecting unlawful acts (including fraud);
- any legal proceedings (including prospective legal proceedings);
- obtaining legal advice; or
- establishing, exercising or defending legal rights.

## What we do with your personal data and our legal basis

We process your personal data for the reasons listed below. In some countries we require a lawful basis to process your personal data and therefore we have also identified this below.

Purpose of processing	Lawful basis
Assessing your skills, qualifications, and suitability for the role, including taking up references and conducting appropriate background checks.	Legitimate interests (to ensure we hire suitable candidates)
Recruitment processes (including negotiation and communicating with you in relation to your application).	Legitimate interests (to run a fair and efficient recruitment process).
<p>Complying with our legal and regulatory obligations, including for the purposes of:</p> <ul style="list-style-type: none"> <li>• preventing illegal working;</li> <li>• complying with health and safety obligations;</li> <li>• responding to government statistical monitoring;</li> <li>• assessing fitness and propriety of individuals for the purpose of relevant regulatory schemes to which we must adhere;</li> <li>• considering whether adjustments may need to be made to accommodate an individual with a disability;</li> <li>• liaising with relevant tax authorities and other government entities or agencies in relation to attachments of earnings and similar deductions; and</li> <li>• communications with public or regulatory bodies.</li> </ul>	Compliance with legal obligations.
Recording interviews for quality control purposes and to train our interviewers.	Depending on local laws, either legitimate interests (to monitor the quality of our interviewers) or your consent.
Carrying out equal opportunities monitoring.	Consent.
Carrying out analytics in relation to Revolut's recruitment practices.	Legitimate interests (to ensure we can improve our recruitment practices where necessary).
Dealing with any legal disputes involving you or other prospective, current or former employees, workers or contractors.	Legitimate interests (to establish, exercise or defend ourselves against legal claims) or, for data subjects in Brazil, regular exercise of rights.

Purpose of processing	Lawful basis
Quality assurance, monitoring and staff training purposes.	Legitimate interests (to ensure our recruitment practices are carried out properly).
Promote the safety and security of our personnel (including by detecting and stopping threats to our personnel and property).	Legitimate interests (to ensure the wellbeing and safety of our staff).

Please note that the lists of processing activities included in this section are not exhaustive. They are illustrative of the different types of processing that we may undertake. Please contact Revolut's DPO if you have a question about whether we process your personal data for a specific purpose not listed in this section.

### **'Special categories of personal data' or 'sensitive personal data'**

We process 'special categories of personal data' or 'sensitive personal data' for the purposes of:

- carrying out the obligations we have to exercise both Revolut's and your specific rights which are imposed by employment laws;
- establishing, bringing or defending legal claims; and
- in the case of personal data about your physical or mental health, to enable Revolut to assess your working capacity and take decisions for occupational health purposes.

In the case of "equal opportunities monitoring", please note that participation is voluntary and providing this information is optional. Any information you provide will not be accessible or used in the hiring process, and has no effect on your opportunity for employment.

## Disclosure of your personal data to third parties

For the purposes set out in Section 7 above, we may share your personal data with:

- our group companies where necessary to process your application;
- professional advisors (including lawyers, accountants and auditors) where necessary to receive their services;
- legal and regulatory authorities (such as tax authorities) where necessary to comply with our legal obligations;
- our third party service providers, including our data hosting service provider, background screening check provider and online recruitment testing service providers.

We also disclose your personal data to third parties where it is in our legitimate interest to do so, including for the following reasons:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or

- if all or substantially all of our assets are acquired by a third party, in which case personal data held about our applicants will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

Except as set out in this notice, or as required by law, we do not sell your personal data or disclose it to any third parties without your consent.

## Security of your personal data

We are committed to ensuring that your personal data is safe and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice.

Unfortunately, the transmission of personal data through the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to or stored on our IT system, and any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

If we share your personal data with any third party, we will take all necessary steps to make sure that your personal data is handled lawfully and securely by that third party.

## How long we keep your personal data

We will keep your personal data for as long as necessary to fulfil the purposes described in this notice or the terms of any contract that we enter into, or for such longer period as may be required by law. After this, where allowed by laws and this notice, we will erase or anonymise your personal data. If you need any additional information about this, please contact our Data Protection Officer at [dpo@revolut.com](mailto:dpo@revolut.com).

## Your rights

Subject to applicable laws in your location, you may have the following rights in relation to your personal data:

- the right to access personal data which we hold about you;
- the right to ask us to correct your personal data if you think it's wrong;
- the right to ask us to delete your personal data in certain circumstances;
- the right to object to us processing your personal data on the basis of our legitimate interests or another lawful basis;
- the right to ask us to restrict how we use your personal data in certain circumstances;

- the right to ask us to transfer personal data to you or another company in a structured, commonly used, machine-readable format in certain circumstances;
- the right to withdraw your consent (where you have previously given us this); and
- the right to ask us to carry out a human review of an automated decision we make about you.

Please note that not all of these rights are absolute and we may not be required to comply with your request where exemptions apply under applicable data protection laws.

## Exercising your rights

You can exercise any of your rights as described in this notice and under data protection laws by contacting Revolut's Data Protection Officer through [dpo@revolut.com](mailto:dpo@revolut.com).

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

We will endeavour to respond to your request within the time period mandated by applicable law. In the UK and the EEA, this means that we will endeavour to respond to your request within one month. Please note, however, that this time period may be extended by a further two months in some cases.

## International transfers

Your personal data will be stored on servers located in the United States, UK or EEA.

Where required by applicable laws, your consent to the transfer of your personal data outside your home country will be obtained as part of your application.

As an international organisation, authorised personnel may access your personal data in any country in which we operate (see Schedule 1). Therefore, it may be necessary to transfer your details to members of our group located in countries that may not have equivalent data protection or privacy laws to those which apply in your own country. We may also need to transfer your personal data to third party service providers located in other countries.

Regardless of where your personal data is transferred, we shall put in place appropriate safeguards to ensure that your personal data is treated securely and in accordance with applicable law. For individuals in the EEA and UK, this usually means entering into Standard Contractual Clauses with the recipients of your data who are located in countries which are not recognised as having adequate data protection laws. More details regarding these safeguards can be obtained from the Data Protection Officer whose details are given above.

## Complaints

Please direct any complaints about how Revolut processes your personal data to our Data Protection Officer.

You also have the right to complain to your local data protection authority:

- a list of European Union data protection authorities can be found [here](#);
- the United Kingdom's data protection authority's contact details can be found [here](#); and
- the Brazilian data protection authority's contact details can be found [here](#).
- the Mexican data protection authority's contact details can be found [here](#).

## Changes

This notice may be amended by Revolut at any time. You can always find the latest version of this notice on our website.

## Schedule 1

### Revolut Employers

#### **Europe, Middle East and Africa (EMEA)**

##### United Kingdom

- Revolut Ltd: 08804411, 7 Westferry Circus, Canary Wharf, London, England, E14 4HD (also as a foreign employer in Belgium, Bulgaria, France, Italy, Romania, Spain, Sweden and Ukraine (for contractors only))
- Revolut Newco UK Ltd: 12871051, 7 Westferry Circus, Canary Wharf, London, England, E14 4HD
- Revolut Trading Ltd: 11567840, 7 Westferry Circus, Canary Wharf, London, England, E14 4HD

##### Lithuania

- Revolut Bank UAB: 304580906, Konstitucijos ave. 21B, 08130 Vilnius, the Republic of Lithuania (also as a foreign employer in Germany, France, Ireland, Netherlands, Poland and United Kingdom)
- Revolut Ltd (Branch) filialas: 305229066, Konstitucijos ave. 21B, 08130 Vilnius, the Republic of Lithuania
- Revolut Securities UAB: 305799582, Konstitucijos ave. 21B, 08130 Vilnius, the Republic of Lithuania

- Revolut Insurance Europe UAB: 305910164, Konstitucijos ave. 21B, 08130 Vilnius, the Republic of Lithuania
- Revolut Holdings Europe UAB: 305820090, Konstitucijos ave. 21B, 08130 Vilnius, the Republic of Lithuania

#### Poland

- Revolut Ltd (Branch) (Sp z o.o.) Oddzial w Polsce: 0000626014, ul. Jana Pawła II 43A, 31-864 Kraków, Polska

#### Ireland

- Revolut Payments Ireland Limited: 650176, Matheson, 70 Sir John Rogerson's Quay, Dublin 2, Ireland
- Revolut Securities Europe Limited: 669293, Matheson, 70 Sir John Rogerson's Quay, Dublin 2, Ireland
- Revolut Holdings Europe Limited: 678388, Matheson, 70 Sir John Rogerson's Quay, Dublin 2, Ireland
- Revolut Ltd (Branch): 909724, 2 Dublin Landings, North Dock, Dublin 1, Ireland

#### France

- Revolut Bank UAB (Branch) Succersale Revolut France: 894 031 244, 3 rue de Stockholm patchwork Saint Lazare 75008 Paris

#### Luxembourg

- Revolut Technologies S.A.: B235100, 19 rue du Bitbourg 1273 Hungary
- Revolut Bank UAB (Branch) Magyarországi Fióktelepe: 01-17-001372, 1085 Budapest, Baross utca 52

#### Portugal

- Revolut Ltd (Branch) Sucursal em Portugal: 980646855, Rua Roberto Ivens, n.1353 4450-208 Matosinhos, Porto, Portugal

#### Germany

- Revolut Ltd (Branch) Zweigniederlassung Deutschland: 93264485 (Betriebsnummer / Employer Number), HRB 211556 B (Handelsregister / Commercial Register), Zimmerstraße 78, c/o Mindspace 10117 Berlin, Germany

#### Ukraine

- Revolut Technologies Ukraine LLC: 44441834, House 4, Mykola Hrinchenko str., Kyiv city, 03038, Ukraine

### **Asia-Pacific (APAC)**

#### Australia

- Revolut Payments Australia Pty Ltd: 634 823 180, Level 8, 222 Exhibition Street, Melbourne, VIC 3000
- Revolut Payments New Zealand Pty Ltd: 645 171 651, Level 8, 222 Exhibition Street, Melbourne, VIC 3000 (only as an employer in New Zealand)

## Japan

- Revolut Technologies Japan, Inc.: 0100-01-188396, ARK Hills South Tower 3F, 1-4-5 Roppongi, Minato-ku Tokyo, 1060032
- Revolut Securities Japan, Inc: 10110-01-128976, ARK Hills South Tower 3F, 1-4-5 Roppongi, Minato-ku Tokyo 1060032

## Singapore

- Revolut Technologies Singapore Pte. Ltd.: 201721013G, 30 Cecil Street, 19-08, Prudential Tower, Singapore 049712
- Revolut Securities Singapore Pte. Ltd: 202102782K, 30 Cecil Street, 19-08, Prudential Tower, Singapore 049712

## India

- Revolut Payments India Private Limited: CIN: U74999MH2021FTC358965, Registration Number: 358965, 1b-1003, Parinee Crescenzo G Block Bkc Bandra Kurla Comple, Bandra East Mumbai, Mumbai, Mumbai City Mh 40005 IN
- Revolut Operations India Private Limited: U74999MH2022FTC379421, 912, Sureshwari Techno IT Park, Village Eskar, Link Road, Borivali West, Mumbai, Mumbai City, Maharashtra, India, 400092

## Hong Kong

- Revolut Technologies Limited: 2571947, 13/F, Gloucester Tower, The Landmark, 15 Queen's Road Central, Central, Hong Kong

## **America**

### United States

- Revolut Technologies Inc.: 6451254, EIN: 37-1863742, Corporation Trust Center, 1209 Orange Street, Wilmington, New Castle County, Delaware (also as a foreign employer in Canada)
- Revolut Securities Inc.: 7419207; EIN: 84-1973433, Corporation Trust Center, 1209 Orange Street, Wilmington, New Castle County, Delaware

### Canada

- Revolut Technologies Ltd: BC1130499, Suite 2300, Bentall 5, 550 Burrard Street, Vancouver, BC V6C 2B5

### Brazil

- Revolut Tecnologia do Brasil Ltda.: 44.626.880/0001-81; Manoel da Nóbrega Street, n. 1280, 10º floor , Paraíso, São Paulo/SP, 04001-902

### Mexico

- Revolut de Mexico S.A de C.V.: N-2022002319, Palmas 405, Int. 1702, Miguel Hidalgo, Lomas de Chapultepec, 11000, Ciudad de Mexico
- Revolut Servicios a la Tecnología, N-2022077662, Palmas 405, Int. 1702, Miguel Hidalgo, Lomas de Chapultepec, 11000, Ciudad de Mexico.

