

## 1. Introduction

We're committed to protecting and respecting your privacy.

We will:

- always keep your personal data safe and private
- never sell your personal data
- allow you to manage your marketing choices at any time

This privacy notice sets out how we will handle your personal data when you use our platform, our services or otherwise interact with us.

This notice only applies to personal data only.

## 2. About us and our role

Revolut Ltd. ("**we**", "**us**" or "**our**") is the company responsible for collecting, and using, your data.

If you are an authorised user of the entity using GlobalHire ("**Authorised User**") to hire and manage the global workforce through GlobalHire ('**GlobalHire Customers**'), we act as controller of your personal data.

If you are a consultant using GlobalHire platform ('**Consultant**'), we generally act as controller of your personal data.

However, we work alongside third party Employer of Record providers ("**EOR providers**") who act as your legal employer. We process certain data as a data processor on behalf of our EOR providers and also GlobalHire Customers, for the purpose of making this information available in the GlobalHire platform, as set out in more detail in section 3 below.

If you have concerns about how we use your personal data, you can contact us at [dpo@revolut.com](mailto:dpo@revolut.com)

## 3. What personal data do you collect about me?

We collect various types of personal data from and about you to provide our services.

This always includes:

- **Contact Information:** Name, address, email address, phone number.
- **Communication Data:** Records of communications with us (e.g., emails, chat logs, phone calls), feedback you provide.
- **Technical Data:** IP address, browser type, operating system, usage data of our platform, cookies and similar technologies.

If you are Consultant, this additionally includes:

#### **A. Personal data Revolut collects as data controller**

- **Identification Data:** name, date of birth, nationality, passport/ID details, your image in photo or video form, and facial scan data extracted from your photo or video (known as 'biometric data'), visa/work permit information (where required for legal compliance or project eligibility),
- **Professional Information:** resume/CV, work history, educational background, professional qualifications, skills, certifications, portfolio, references, professional licenses, desired roles/projects, availability, work preferences, professional social media links (e.g., LinkedIn).
- **Performance Data:** information related to your performance on projects facilitated by GlobalHire, client feedback, project start and end dates.
- **Financial Information:** bank account details (for payment purposes), tax identification numbers (e.g., TIN, NIP, VAT number), billing rates, payment history.
- Any other information you provide us.

#### **B. Personal data Revolut collects as data processor on EOR providers' behalf**

- **Employment data:** employment agreement information, benefits and related data.
- **Criminal records related information:** information about ongoing criminal procedures (when required by EOR providers to comply with applicable laws).
- **Health-related information:** illness or injury, sick leaves, medical certificates or documentation substantiating the need for absence, disabilities, infirmity, accidents, expositions to risk factors, physical and mental fitness to perform specific tasks (when required by EOR providers to comply with applicable laws).
- **Personal data revealing political opinions, religious or philosophical beliefs** (when required by EOR providers to comply with applicable laws).
- **Personal data relating to exercise of public functions and political offices, activities and trade union tasks** (when required by EOR providers to comply with applicable

laws).

If you are Authorised User, this additionally includes:

- **Representation information:** your role in the GlobalHire Customer organisation.  
You may provide us with personal data when you:

- fill in any forms
- correspond with us
- respond to any of our surveys
- create GlobalHire account
- use our products or services
- contact us for other reasons

We collect personal data from various sources:

- **Directly from You:** When you register on our platform, complete your profile, apply for projects, communicate with us, or provide documents.

- **Automatically:** Through your use of our website and platform, via cookies and tracking technologies. Whenever you use our website, we collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, the browser type and version, the time zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system and the type of mobile browser you use.
- information about your visit, including the links you've clicked on, through and from our website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page.

If you are a Consultant, we also collect your personal data from the following third parties:

- **GlobalHire Customers:** information necessary to invite you to GlobalHire, such as email address, contract details, information on benefits as well as feedback or information related to your work on projects.
- **EOR providers:** copy of your employment contract, payroll, tax, and benefit-related personal data.
- **Revolut entities:** if you hold a Revolut account, we will receive your KYC status, ID document details (first name, last name and date of birth), address, gender, internal referral code and risk score from Revolut entity providing you with financial services. This data is used to facilitate your identity verification and onboarding to GlobalHire.

#### 4. How do you use my personal data?

We have explained the purposes for which we use your personal data, as well as our lawful bases for doing so, in the table below.

What we use your personal data for	Our legal basis for using your personal data
To onboard you to GlobalHire and verify your identity during onboarding	Keeping to contracts and agreements Legitimate interests Consent (when applicable)
To provide you with GlobalHire products and services (including, for example, to manage and administer our relationship with you)	Keeping to contracts and agreements Legitimate interests

#### 5. What are my rights?

You have certain rights in relation to your personal data under data protection laws. These include the right to:

- access personal data which we hold about you
- ask us to correct your personal data if you think it's wrong
- ask us to delete your personal data in certain circumstances
- object to us processing your personal data on the basis of our legitimate interests
- ask us to restrict how we use your personal data in certain circumstances
- ask us to transfer personal data to you or another company in a structured, commonly used, machine-readable format in certain circumstances
- withdraw your consent (where you have previously given us this)

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.

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).

Depending on where you are located, you may also have the right to complain to your local data protection regulator if you are unhappy with the way we handled your data.

## **6. Do you share my personal data with anyone else?**

We may share your personal data with our third party service providers, such as our data hosting providers, communications service providers and ID verification services providers to the extent necessary to achieve the purposes set out above.

If you are the Consultant, we also share your personal data collected through GlobalHire platform with:

- **Your EOR provider.** This is necessary to enable them to comply with their obligations as your legal employer. The EOR provider is always acting as an independent controller of your data.
- **GlobalHire Customer.** We always share your employment contract with the GlobalHire Customer who has decided to hire you. We may also share with them the following types of personal data when you enable this sharing through GlobalHire platform.
  - payroll and tax data,
  - Personal information relating to criminal records and ongoing criminal procedures (when applicable);
  - Health-related information that refers to illness or injury, sick leaves, medical certificates or documentation substantiating the need for absence, disabilities, infirmity, accidents, expositions to risk factors, physical and mental fitness to perform specific tasks (when applicable)

For the avoidance of doubt, the GlobalHire Customer will act as an independent controller of any data we share with them.

## **7. Do you transfer my personal data internationally?**

Revolut is located in the United Kingdom and our main data hosting facilities are located in the United Kingdom (“**UK**”) and European Union (“**EU**”). By using GlobalHire, you acknowledge that your personal data will be processed in the UK and EU. It’s possible we may also need to transfer your personal data to other countries internationally to achieve the purposes set out in section 4 (How do you use my personal data?) above.

If we transfer your personal data outside the EU or UK, please rest assured that we will always take all necessary steps to make sure that your personal data is protected. This includes entering into Standard Contractual Clauses with third party recipients of your data or transferring it to third parties in countries which are recognised as having an adequate level of protection for personal data.

If you would like more information, please contact us by sending an email to [dpo@revolut.com](mailto:dpo@revolut.com).

Where required by applicable laws, your acceptance of this privacy notice will constitute your consent to your personal data being transferred outside your home country.

### **8. How long will you keep my personal data for?**

We will keep your personal data for as long as necessary to achieve the purposes set out in section 4 (How do you use my personal data?) above. However, we may need to retain your personal data for a longer period to the extent required by applicable laws.

### **9. How do you protect my personal data?**

We recognise the importance of protecting and managing your personal data. Any personal data we process, including sensitive data, will be treated with the utmost care and security.

We use a variety of physical and technical measures to:

- keep your personal data safe
- prevent unauthorised access to your personal data
- make sure your personal data is not improperly used or disclosed.

Electronic data and databases are stored on secure computer systems with control over access to information using both physical and electronic means. Our staff

receives data protection and information security training. We have detailed security and data protection policies which staff are required to follow when they handle personal data.

While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorised access, we cannot guarantee it will be secure during transmission by you to our website or other services. We use HTTPS (HTTP Secure), where the communication protocol is encrypted through Transport Layer Security for secure communication over networks, for all our web services.

## **10. Updates**

We may update this privacy notice from time to time. Any changes will be posted on this page. If we make any material changes to this privacy notice, we may notify you by email before the change becomes effective.