

# **CANDIDATES PRIVACY NOTICE**

Last Update: July 1st, 2025

## INTRODUCTION

This Candidate Privacy Notice ("Notice") outlines how Bamboo group of companies collects and uses the personal data of individuals applying for roles with us ("Candidates", "you", or "your"). It explains the types of data we gather during the application and hiring process, the reasons for collecting it, how we use it, and the rights you have regarding your personal information.

For the purpose of this Notice, "Data Protection Legislation" means: In the EEA: (1) the General Data Protection Regulation (EU) 2016/679 (the "EU GDPR") and any other data protection legislation applicable within the EEA; (2) in the UK: (i) the UK Data Protection Act 2018; and (ii) the GDPR as amended and adopted by UK law by virtue of section 3 of the European Union (Withdrawal) Act 2018 (the "UK GDPR"); in the USA: (1) the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), as applicable; and in Latin America: (1) Chile: Law No. 19,496 on Consumer Protection (Ley sobre Protección de la Vida Privada); (2) Argentina: Personal Data Protection Law (Ley 25.326); (3) Uruguay: Personal Data Protection Law (Ley N° 18.331); (4) Brazil: General Data Protection Law (Lei Geral de Proteção de Dados - LGPD); (5) Mexico: Federal Law on the Protection of Personal Data Held by Private Parties (Ley Federal de Protección de Datos Personales en Posesión de los Particulares); (6) Peru: Personal Data Protection Law (Ley N° 29733); and (7) Colombia: General Data Protection Law (Ley 1581 de 2012). Legal terms related to data protection used in this Privacy Notice follow the definitions provided by the mentioned legislations.

We highly encourage you to review this Notice carefully to ensure you fully understand and accept its contents. If you do not agree with the terms outlined, please refrain from sharing your personal information with us.

While you are not legally obligated to share any personal data, choosing not to do so may prevent us from processing your job application.



# 1. WHO WE ARE?

We provide our services to our Customers through our different Entities. Each of these Entities are separate data controllers or data processors but are collectively referred to in this Privacy Notice as "Bamboo", "we" or "our" or "us".

Depending on the company of our group You contact, Your data may be processed as a controller by one or more of the following companies:

- Bamboo Payment Uruguay S.A. (f/k/a Perdury S.A.) with registered address at Paraguay 2141, Aguada Park, Office N°19, Floor 1, Building 3, CP 11800, Montevideo
  – Uruguay.
- Bamboo Payment Holding LLC with registered address 2415 NE 194th St. 33180-2159 Miami FL-US.
- Siempre Pago Srl With Registered Address At Maipu 645, 2nd Building, 2nd Floor,
   Office 5, Ciudad Autónoma De Buenos Aires, Argentina.
- Bamboo Payment Europe Limited with Registered Address At Avenue 77 Business
   Centre Triq In-Negozju Zone 3 Central Business District Malta Malta Cbd 3010.
- Bamboo Payment Holding Europe Limited With Registered Address At 171, Old Bakery Street, Valletta VIt1455, Malta.
- Bamboo Payment Argentina S.A. with Registered Address At Cecilia Grierson 255,
   Piso 6, Caba.
- Bamboo Payment Brasil Instituição De Pagamento Ltda With Registered Address
   At Av. Nove De Julho, 5955 Loja 5971, Sao Paulo, Brasil.
- Bamboo Payment Systems Chile Spa with Registered Address At Avenida Andrés
   Bello 2687, Piso 24, Comuna De Las Condes, Santiago, Región Metropolitana, Chile
- Bamboo Payment Mexico Srl De Cv with Registered Address At Campos Elíseos No. 169, Interior 202, Col. Polanco Chapultepec, Cp 11560, Delegación Miguel Hidalgo, Ciudad De México.
- Bamboo Payment Colombia Sas with Registered Address Calle 127 B Bis 21 71,
   Bogota Colombia
- Bamboo Payment Peru S.A.C with Registered Address At Av. Nicolas Arriola Nro.
   314 Dpto. D Int. 1102 Urb. Santa Catalina, Distrito De La Victoria, Provincia De Lima,
   Región Lima, País Perú.



## 2. PERSONAL DATA WE COLLECT

Throughout the application and recruitment process, you may provide us (or we may otherwise have access to) the following types of personal data about you "Personal Data":

- provide the services you request from us (Lawful Basis: to comply with our legal obligations and performance of our contract with you);
- identifying data,
- contact details,
- resume/CV,
- work-related data,
- public social media activity,
- career history and specific questions regarding your anticipated role,
- events in the lifecycle of your candidacy,
- your responses to questionnaires sent to you by us,
- information about your candidacy and employment options (such as availability to be hired and salary expectations),
- evaluations of your candidacy,
- internal discussions within Bamboo about your candidacy,
- materials you or other parties (such as evaluators or background check providers)
   submitted in relation to your candidacy and any additional Personal Data you choose to share with us.

We may collect this data directly from you, as you provide it voluntarily through your application and candidacy review process, or from other sources such as recruitment agencies, background check services (as applicable and subject to applicable law), LinkedIn or your references.

We may use your information to evaluate your qualifications, skills, and overall suitability for current or future roles within our organization, as well as to manage and process your application and communicate with you throughout the recruitment process. Additionally, your data may help us mitigate risks, strengthen our security and fraud prevention efforts, and generate aggregated or inferred insights to improve and refine our hiring practices.



We may also process your data to meet legal or regulatory obligations, where applicable. If we intend to use your information for purposes beyond those described here, we will seek your explicit consent beforehand.

## 3. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

Depending on your jurisdiction, Bamboo needs a lawful basis in order to process your personal data.

We may process your personal data for one or more lawful bases of processing ("Lawful Basis") depending on the specific purpose for which we are using your data (see below).

- 1) Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- 2) Processing is necessary for the purposes of the legitimate interest in the activity of recruitment and selection of personnel; and/or
- 3) Processing is necessary for compliance with a legal obligation to which the controller is subject.

For special data, the legal basis is the performance of the obligations and exercise of specific rights of the data controller or the data subject in the field of labor law and social security law and social protection.

We use information held about you in the following ways:

- 1) To consider your application in respect of a role for which you have applied.
- 2) To consider your application in respect of other similar roles.
- 3) To communicate with you during the recruitment process.
- 4) To enhance any information that we receive from you with information obtained from third party data providers.
- 5) To find appropriate candidates to fill our job openings.
- 6) To send you a formal employment offer, if we determine you are a suitable candidate.
- 7) To help our service providers (such as Workable's processors and data providers) and Partners (such as the job sites through which you may have applied) improve their services. For special data, the legal basis is the performance of the obligations and exercise of specific rights of the data controller or the data subject in the field of labor law and social security law and social protection.





# 4. HOW WE USE YOUR PERSONAL DATA

We may disclose your information to our third party service providers, who use it only in accordance with our instructions and as otherwise required by law.

- our employees, our affiliates and their employees. For instance, Bamboo will share your information with other Bamboo affiliates for the purpose of conducting the recruitment and hiring process.;
- our third-party consultants, (sub-)contractors, suppliers or other service providers who may access your personal information when providing services to us (including but not limited to IT support services, website host, and job portals)
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;
- analytics and search engine providers that assist us in the improvement and optimisation of our Website;
- our successors in title, our prospective sellers or buyers of our business or to our
   Affiliates when we have a merger or re-organisation;
- government bodies and law enforcement agencies and in response to other legal and regulatory requests;
- any third-party where such disclosure is required in order to enforce or apply our
   Website Terms or other relevant agreements; and

Where your details are provided to any other party in accordance with an express purpose, we will require them to be kept safe and secure your personal data and only use it for the intended purpose.

## 5. DATA SECURITY

We use reasonable administrative, technical, and physical measures to protect your personal information from unauthorized access, use, alteration, and disclosure. However, no method of transmission over the Internet or method of electronic storage is 100% secure, so we cannot guarantee its absolute security.

We strive to protect the data we store in our records, but we cannot guarantee complete security. Factors such as unauthorized access or use and hardware or software failure, among others, may compromise the security of the data.



Please remember that data transmission over the Internet is only partially secure due to various factors, such as network and operation. Therefore, Bamboo cannot guarantee the complete security of the data transmitted. Although we do our best to protect your data, we cannot guarantee the network security you use to access our website. Any transmission is your sole responsibility, who, by agreeing to this Notice, expressly acknowledges and assumes such responsibility.

Once received, we undertake to ensure its security. To prevent unauthorized access or disclosure of your data, we have implemented physical, electronic, and administrative procedures to ensure that the data we collect is secure.

#### 6. DATA RETENTION

We will retain your personal information only for as long as is necessary for the purposes set out in this Notice, unless a longer retention period is required or permitted by law.

We will take reasonable steps to destroy or permanently de-identify personal data that is no longer needed for any purpose that is permitted by Data Protection Legislations. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of Your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Given the global nature of our services, your Personal Data may be maintained, processed and stored by us in Amazon Web Service, located in the United States and Ireland.

## 7. DATA

We will take all necessary precautions to ensure that the information we collect, use, or share is accurate, complete, and up-to-date. If your details change or if you believe the information we have about you is inaccurate or incomplete, please reach out to us. In some cases, you may also have the right to:



- Request access to your personal data (also known as a "data subject access request"). This allows you to receive a copy of the personal data we hold about you and verify that we are processing it lawfully.
- Request updates or corrections to the personal data we have on file for you. If any of the data is incomplete or incorrect, you can ask us to correct it, although we may need to verify the accuracy of the new information you provide.
- Request the deletion of your personal data. You may ask us to erase your
  personal data if there is no valid reason for us to continue processing it. However,
  we may not be able to fulfill this request for specific legal reasons, which we will
  explain to you.
- Object to the processing of your personal data if we are relying on a legitimate interest (or that of a third party) and there is something in your situation that makes you want to oppose the processing. You can also object if we are processing your personal data for direct marketing purposes. In some cases, we may show that we have strong legitimate grounds to process your data, which may override your rights and freedoms.
- Request a restriction on the processing of your personal data. You may ask us to pause processing your data in the following situations: (a) to verify its accuracy; (b) if our use of the data is unlawful but you don't want us to erase it; (c) if you need us to retain the data even if we no longer need it for other purposes, such as to establish, exercise, or defend legal claims; or (d) if you have objected to the processing but we need to verify whether we have overriding legitimate grounds to continue using it.
- Request that your personal data be transferred to you or to another third party. We will provide your data in a structured, commonly used, machinereadable format to you or a third party you designate. Please note this right applies only to automated data that you initially consented to share with us or data we used to fulfill a contract with you.
- Withdraw your consent at any time if we are processing your data based on consent. However, this will not affect the legality of any processing done before you withdrew your consent. If you withdraw consent, some products or services may no longer be available to you, and we will inform you of this.



You can contact us through at <a href="mailto:dpo@bamboopayment.com">dpo@bamboopayment.com</a> to exercise your rights or ask questions. Bamboo Payment strives to respond to all requests within the legal period of 15 (fifteen) days.

## 8. INTERNATIONAL TRANSFERS

Your Personal Data may be transferred to other countries during our services, either between Bamboo representatives in different countries or to Third Parties. In such cases, we will take the measures required by Applicable Law to ensure that your Personal Data remains protected and that this transfer is carried out following one of the transfer mechanisms.

## 9. CHANGES TO THIS PRIVACY NOTICE

Bamboo is constantly evolving, so this Notice's terms may also change. Therefore, we recommend that you access this document often or whenever in doubt to keep up with any updates. If the changes are material, we will include a notice on Bamboo's website homepage indicating that a change has been made.

# 10. CONTACT US

If you have any questions, suggestions, or complaints regarding the provisions of this Privacy Notice, or if you would like to submit any request regarding your Personal Data, you may contact us to <a href="mailto:dpo@bamboopayments.com">dpo@bamboopayments.com</a>.