

Privacy of personal data in the context of recruitment

1. Introduction

For over 40 years, APRIL International Care Asia (“APRIL”, “we” or “us”), part of the APRIL Group company, has been **specialising in the provision of international insurance solutions**. We design, distribute and manage insurance plans and assistance services for individuals - travellers or expats - and businesses. We collect data from candidates who are interested in working with us in Hong Kong, Singapore, Thailand, Vietnam, the Philippines, Indonesia, Dubai and China. We encourage you to read this data privacy notice so that you understand how we will handle your personal data as part of our recruitment process.

2. Processing your data legally

In accordance with the law, we are committed to processing, protecting and respecting all personal data concerning you. Our recruiters are subject to a duty of confidentiality. Your personal data is processed by our partner Bamboo HR LLC and is stored securely in our email system and on our servers.

- A. Your personal data is processed in the legitimate interests of APRIL, which leads us to source talent for job vacancies and to process candidates' data during the recruitment process. By applying for a job, you acknowledge and agree that APRIL processes your personal data in accordance with this data privacy notice. The processing of your relevant personal data is necessary to enable us to determine whether you are suitable for the job for which we are recruiting.
- B. We may also store and process your personal data for two years after your application. This is to enable us to reconsider your application for other vacancies during two years. You may withdraw your consent for this and request us to delete your personal data at any time and thereafter we will not invite you to participate in any future recruitment processes.

Please note that APRIL will offer you the same terms and opportunities in the recruitment process in which you participate, even if you do not consent to the retention of your personal data thereafter.

3. Sources of personal data

By applying for one of our vacancies, whether published by APRIL or by another data controller (such as professional database providers or recruiters), you are making your personal information available to us. As a result of your application, we may obtain information about you from sources on the internet, such as professional social media websites (such as LinkedIn)

In relation to your employer, current or former colleagues, we will not contact them unless you give us permission to do so.

It is also possible that the recruitment process is initiated by us, by contacting you directly. We may contact potential candidates directly on the basis of publicly available information, information from professional social media platforms (such as LinkedIn) or recommendations, references.

4. Type of personal data we process

When you apply for one of our vacancies, published by us or by a recruitment agency acting on our behalf, we process the personal data you share in your CV and during interviews.

This includes your contact details, education, qualifications and work history.

Information obtained when taking up a reference will be treated as personal / is considered personal data and will be processed in accordance with this privacy notice.

In the event that we contact you to recruit you for a vacancy, only your public data (your name and contact details) will be processed until you express your interest in the position or lack thereof. If your response is positive, your personal data will be processed as if you were applying directly for a job.

If you do not express interest, or we are unable to contact you, your personal data will be deleted immediately.

5. Purposes of processing personal data

We process your personal data solely as part of the recruitment process to review and assess your skills and experience. We will arrange interviews, background checks and professional qualifications, verify your professional background and qualifications by obtaining references from previous employers and/or colleagues.

When all this process is finalised and we are able to offer you a job, a new data privacy notice will be issued for the duration of your employment, which will contain the relevant information and the legal basis under which we process your personal data for the duration of your employment.

6. Who we share your personal data with

We share your personal data relating to the position you have applied for (covering the position and the skills and experience required) with the references you have provided.

When taking up a reference, we may share your personal data with the referees whose details you have provided.

In the case of specific positions, your career data may be shared with other members of the APRIL Group, if this is necessary for the assessment of your eligibility. We will be happy to provide you with more information on this subject.

When you accept our offer for a position, your personal data will be shared with the relevant tax and social security authorities to enable you to start in your new job.

7. Transfers of data outside the countries in which we operate

Any processing of personal data outside Hong Kong, Singapore, Thailand, Vietnam, the Philippines, Indonesia, Dubai, China and the European Union shall require your prior written consent and may only be carried out if all legal requirements under applicable data protection law for such processing are fulfilled. Such measures may include (without limitation) transferring the personal data to a recipient in a country which provides adequate protection for personal data, to a recipient that has achieved binding corporate rules authorisation in accordance with applicable data protection law.

8. Your rights

Your rights under data protection legislation depends on the country in which you are located, but may include the following:

- 7.1 Right to request access to the personal data: You can obtain confirmation that your data is being processed and that you have access to your personal data processed by us and other additional information.
- 7.2 Right to request rectification of your personal data: This means that you have the right to have your personal data corrected, completed if they are inaccurate or incomplete.
- 7.3 Right to data portability: It allows you to access and reuse the personal data that you have provided to APRIL so that you can further make use of this data for your own purposes, with different service

providers. You are entitled to receive an electronic copy of your personal data and to ask us to transfer it to another organization.

- 7.4 Right to request the deletion of your data: This means that you have the right to have your personal data deleted in specific circumstances, if there is no legal reason to continue processing it.
- 7.5 Right to object to our processing of your data. This means that in some cases you have the right to object to the processing of your data by APRIL.
- 7.6 Right to ask us to restrict processing. This means that you can request to "block" or delete the processing of your personal data. Your validated request will result in us being allowed to store your personal data, without further processing of it.
- 7.7 Right to data portability. It allows you to obtain and re-use your personal data for your own purposes on different services. You have the right to move, copy or transfer personal data easily and securely.

If you have any questions

If you wish to exercise your rights or if you would like more information about your rights above, please contact our Data Protection Officer at Privacy@april.com.

If you are not satisfied with the way we process your data, you have the right to lodge a complaint with the supervisory authority in your country of residence, however, we encourage you to report any problems to us before taking such action.

If you have any further questions, please do not hesitate to contact your recruiter directly.