

J.A.P Tech Consulting LLC – Privacy Policy

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1. Introduction

This Privacy Policy explains what we do with your personal information. It describes how we collect, use and process your personal data and how we comply with our legal obligations towards you. Your privacy is important to us, and we are committed to protecting your data privacy rights. This Privacy Policy applies to the personal data of website Users, Candidates, Clients, Suppliers and other persons or institutions with whom we will contact to obtain additional information about our Candidates. The controller of personal data in our Database is J.A.P Tech Consulting LLC (“J.A.P”) registered at 111 Town Square Place Suite 1201, Jersey City, NJ 07310, USA. We have appointed Prighter Group as our EU representative (see Section 16).

2. What kind of personal data do we collect?

- **Candidate Data:** To provide you with the best possible employment opportunities tailored to your needs, we need to process certain information about you. We only ask for information that we believe will really help us, such as your name, age, contact details, education, employment history, emergency contacts, immigration status, financial information and social security number (you can of course provide us with other relevant information). We will also collect some of your data to the extent that you use our website or click on links included in the emails we send you.

- **Customer Data:** If you are a customer of J.A.P Tech Consulting, we must collect and use information about you or people in your organization while providing or offering you such services to find Candidates suitable for you or your organization. We also gather your personal data to manage the marketing and sales activities with you and to manage the contracts signed with you and to manage our financial operations.

- **Website Users:** We collect a limited amount of data from users of our website to improve your experience when using our website and to facilitate the management of the services we provide. This includes information such as how you use our website, the frequency with which you access our website and the times when our website is most popular. Some of your personal data that we collect is necessary to enable us to fulfill our contractual obligations towards you or others. Depending on the type of personal data and the reasons for which we process it, if you refuse to provide us with such data or request that we stop processing it, we may not be able to meet our contractual requirements or, in extreme cases, continue our relationship.

3. What are your rights?

J.A.P fully respects your rights. Therefore, we would like to inform you that you can contact us directly and exercise the following rights at any time: the right to access data, rectify, delete, object, transfer data to another administrator or limit the right to process them and withdraw consent, subject to withdrawal consent will not affect the lawfulness of the processing carried out on its basis prior to its withdrawal. Giving consent is voluntary, so it can be withdrawn at any time. The security of your data is our priority, however, if you believe that by processing your personal data, we violate the provisions of the GDPR, you may lodge a complaint with the President of the Personal Data Protection Office.

4. How do we use your personal data?

●Candidate data: The main reason for using your personal data is to help find employment for you. The more information we have about you, your skills and possibilities, the better we can tailor our service to your needs.

● Customer Data: The main reason for using customer information is to allow us to introduce ourselves and make sure that the contractual arrangements (sale, recruitment, marketing and accounting operations) between us, to keep the relationship running smoothly.

● Website users: We use your data to improve your experience when using our website, for example by analyzing your recent job search criteria, so that we can present positions of interest to us.

5. Who do we share your personal data with?

● Candidate Data: We share your data with potential employers to increase your chances of getting a job. This includes clients located in the United States. See Section 17 (International transfers) for safeguards.

● Client Data: Shared as needed to ensure an appropriate pool of candidates; to manage contracts, sales/marketing activities, and finance documentation. This may include U.S.-based recipients (see Section 17).

● Website Users: Unless you choose otherwise, we may share your information with web analytics service providers, marketing automation platforms, and social networks to target ads you receive from us.

6. How long do we keep your personal data?

- **Candidates:** If we have not had contact with you for 12 months, we will delete your personal data unless law requires retention (e.g., tax obligations or anticipated legal proceedings). We retain candidate profiles in our talent pool for 12 months to match you with current and future roles, unless you object or request deletion sooner (subject to legal retention obligations).
- **Customers:** Retained while we provide/receive services or inform you about services of interest. If you object, we will delete your data unless law requires otherwise.

7. How to access, correct or withdraw the personal data provided to us?

Even if we already have your personal data, you still have various rights in relation to it.

- **Right to object:** If we use your data because we deem it necessary for our legitimate interests and you do not agree to it, you have the right to object
- **Right to withdraw consent:** Once you have consented to the processing of your personal data for specific activities such as recruitment, sales, marketing, you can withdraw your consent at any time
- **Right to Erase:** In some situations, you have the right to request that your personal information be "erased" if you are a candidate, client or our partner
- **Right to data portability:** You have the right, at your discretion, to transfer your data from us to another data controller. We will help you with this - either by transferring your data directly for you or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority
- **If your interests or requirements change,** you can unsubscribe from some or all of our marketing content

8. What are cookies and how do we use them?

● A "cookie" is a small string of data stored on your computer's hard drive. Almost all websites use cookies without harming your system. We use them to track your activity to provide you with the smoothest possible experience when visiting our website. We may use information from cookies to make sure that we offer you options tailored to your preferences on your next visit. We may also use cookies to track network traffic and for advertising purposes.

● If you want to check or change the types of accepted cookies, you can usually do it in your browser settings.

9. How to reject cookies?

● If you do not want to receive cookies that are not strictly necessary for the basic functionalities of our website, you can refuse your consent by changing your browser settings accordingly.

● Most web browsers accept cookies, but if you prefer that we do not collect your data in this way, you can accept all or part of the cookies or reject them in your browser's privacy settings. However, if you decline all cookies, you may not be able to take full advantage of all the functionality of our website. Each browser is different, so check the "Help" menu in your browser for information on how to change your cookie settings.

● Additional information on cookies and how to disable them is available at aboutcookies.org. There you will also find information on how to delete cookies from your computer.

● For full transparency and compliance with applicable data protection laws, we may maintain a separate **Cookie Policy** that provides detailed information about the types of cookies we use, their purposes, and how you can manage them. You can access our Cookie Policy via link available at the bottom of our website.

10. What data do we collect?

Candidate Data: Depending on the circumstances and applicable laws and requirements, we will collect some or all of the information listed below in order to enable us to offer you employment opportunities tailored to your circumstances and requirements.

- first name and last name;
- age / date of birth;
- sex;
- photography;
- marital status;
- contact details;
- education;
- employment history;
- reference contact details;
- immigration status (when a work permit is required);
- nationality / citizenship / place of birth;
- date of commencement of work or availability of a
- copy of the driving license and / or passport / ID card;
- bank details for processing payment;
- Information on criminal records, if required by the client you want to apply for;
- Details of your previous and current salary, retirement, disability and employee benefits;
- information about your interests and needs for your future employment, collected directly and indirectly, for example from viewed job offers or articles read on our website or from links contained in emails we sent;
- additional information that you choose to provide us with;
- additional information that your reference contacts choose to provide us with;
- IP address;
- the dates, times and frequency with which you use our website

The above list of the categories of personal data we may collect is not exhaustive. We will also collect some of your data to the extent that you use our website, or the links included in the emails we send you.

We process sensitive data only when required by law or when necessary for the recruitment process, and only with the candidate's explicit consent.

Customer data: The data we collect about customers is basically very little. Basically, we only need your contact details or the contact details of people in your organization (such as their names, telephone numbers and e-mail addresses) to enable us to contact you about our services (sales, marketing, accounting), to ensure the smooth running of our relationship and where appropriate cases of providing services to your employees. We may also have additional information that someone in your organization has chosen to provide to us. We will also collect some of your data to the extent that you use our website or click on links included in the emails we send you.

Website Users: We collect a limited amount of data from users of our website to improve your experience when using our website and to facilitate the management of the services we provide. This includes information such as how you use our website, how often you visit our website, your browser type, the location from which you browse our website, your chosen language and the times when our website is most popular.

11. How do we use your personal data?

Candidate Data: We generally use Candidate Data in four ways:

- Recruiting Activities;
- Marketing activities;
- To help us establish, exercise or defend legal claims.
- Profiling;

Client data: We generally use Candidate Data in four ways:

- Sales activities;
- Marketing Activities;
- Legal activities;
- Financial activities; The main area of our activity is, of course, recruitment - matching the right Candidates with the right Positions. We have listed below the different ways we will

use and process your personal information for this purpose, when appropriate and in accordance with local laws and requirements. Please note that this list is not exhaustive.

- Collecting your data from you and from other sources, for example LinkedIn, job portals, other social media platforms;
- storing your data in our database so that we can contact you in connection with recruitment;
- providing our recruitment services and improving the recruitment process;
- evaluating your data for jobs that we believe may be appropriate for you;
- sharing your information with Clients in order to apply for a position or evaluate your qualifications;
- enabling you to submit your CV, apply for positions online or subscribe to notifications about advertisements which we believe may be of interest to you;
- fulfillment of our obligations resulting from all contracts concluded between us,
- conducting customer satisfaction surveys;
- verification of data provided by you or requests for information (such as references, qualifications and potential criminal record, to the extent appropriate and in accordance with local law); Marketing and sales activities: We will periodically send you information that we believe may be of interest to you or ask you to help us match applicants with your jobs. We will need your data for the purposes listed below when appropriate and in accordance with local laws and requirements. Please note that this list is not exhaustive.

This includes:

- Enabling us to develop and market J.A.P products and services;
- Sale of the full range of our recruitment services of J.A.P
- Manage contracts and accounting;
- Sending you details of reports, promotions, offers, networking and customer events, as well as general Information about industries we think may be of interest to you;
- Sending you promotional and marketing information to help us expand your business. To help us establish, exercise or defend legal claims.
- In rare cases, we may use your personal information to help us establish, exercise or defend legal claims.

12. Profiling

● Profiling is a type of data processing involving the use of your personal data collected by us in order to create your profile. This way, we can better understand who you are and what interests you, what you like and what you don't like, which allows us to offer you the best possible service. Please note that while we may use profiling techniques to improve your job search experience (e.g., by suggesting roles that align with your interests or background), we do **not** use automated decision-making processes that produce legal or similarly significant effects without human involvement. All final recruitment decisions are reviewed and made by qualified professionals. We are committed to ensuring that profiling activities are transparent, fair, and always subject to human oversight.

13. With whom do we share your personal data?

We may share with:

- authorized employees of J.A.P;
- clients to whom you may be referred/assigned (including clients located in the United States — see Section 17);
- healthcare professionals where appropriate and lawful;
- potential employers for temps (e.g., for references);
- entities storing/reference-checking your information (employers, schools, exam bodies, agencies);
- tax/audit/other authorities where legally required;
- service providers acting on our behalf (consultants, partners, lawyers, auditors, accountants, admin, tech support, IT consultants);
- external IT/hosting/document storage providers under data processing agreements;
- marketing technology platforms/providers;
- job boards/platforms/search engines/cloud DBs to improve matching;
- third parties for references/qualification/criminal checks where lawful;
- client auditors (internal/external) on request where contractually/statutorily required;
- third parties helping us optimize selection processes;
- prospective/new owners in case of merger/acquisition discussions.

International transfers and safeguards are described in Section 17.

Legal Basis – Legitimate Interest

We rely on Article 6(1)(f) GDPR where processing is necessary for our or third parties' legitimate interests and not overridden by your interests/rights (e.g., providing recruitment services, sharing profiles with potential employers, internal admin, legal compliance). You may object at any time.

14. Consent:

- In certain circumstances, we are required to obtain your consent to process your personal data in relation to specific activities. Depending on what exactly we do with your information, this consent will be opt-in or soft opt-in.
- Article 4 (11) of the GDPR states that consent means "freely given, specific, informed and unambiguous demonstration of the will, which the data subject, by means of a declaration or a clear affirmative action, authorizes the processing of personal data relating to him". In simple terms, this means:
 - you must give us your consent voluntarily, without us putting any pressure on you;
 - you need to know what you consent to, so we will make sure that we have given you sufficient information;
 - you should be in control of which processing activities you consent to and which you do not consent to. We provide the possibility of such a more precise selection in our privacy settings center; and
 - you must take positive and affirmative action by giving us consent - we may provide a box to be checked so that this requirement is met clearly and unambiguously. We will record the consents that have been given in this way.
- As already mentioned, in some cases we will be able to rely on consent in the soft opt-in system. We may offer you products or services related to the recruitment services we provide to you, unless you object to receiving such correspondence.
- Please note that in some of the jurisdictions in which we operate, we comply with additional local laws and consent requirements to receive marketing materials. For more information on this matter, please contact us: office@japtechconsulting.com
- As mentioned, you have the right to withdraw your consent to these activities. You can do it at any time. Establishment, Execution or defense of legal claims
- Sometimes it will be necessary for us to process personal data and, where applicable and in accordance with local laws and requirements, confidential personal data in connection with the exercise or defense of legal claims. Art. 9 (2) (f) of the GDPR allows the above processing "is necessary for the establishment, exercise or defense of legal claims, or in the administration of justice by courts"
- The above circumstances will arise, for example, when we need legal advice in connection with legal proceedings or when the law requires the retention or disclosure of certain information as part of a court process.

- The processing of personal data to comply with our contractual obligations to you, make sure that you comply with your contractual obligations relating to our relationship
- The basis is Art. 6 sec. 1 lit. (b) GDPR, which applies if the processing of personal data "is necessary for the performance of a contract to which [you are] party or in order to take steps at [your] request, prior to entering into a contract";
- We may use automated decisions based on your consent. We will only do this when it is necessary for the performance of the contract concluded between us and you and one of our clients, or if it is necessary for the performance of activities necessary before the conclusion of the contract. We will only do this when we have your current consent to process your personal data;
- In our opinion, it is reasonable to assume that you, as a Candidate, hope to be employed in a new position by using our services. This may include checking if you meet the specific requirements for a given position. If many candidates apply for a job for a given position, we may have to check the qualifications of a large number of potential Candidates, therefore we can use automated decision making to limit the number of filters for this group of Candidates;
- Please note that in some of the countries in which we operate, data processing may be based on other legal bases;

15. Glossary

- **Candidates** - includes candidates for any position offered or promoted by J.A.P Tech Consulting or persons who are reasonably considered by J.A.P Tech Consulting to be interested in applying for any position, including permanent, part-time and temporary employment as well as positions for freelancers for J.A.P Tech Consulting Clients (including persons who want or who, in the opinion of J.A.P Tech Consulting, deems they want to work as Temporary Employees for justified reasons); as well as people who submitted their CVs unrelated to a specific job offer. Individual contractors, freelancers and employees of suppliers or other third parties proposed for positions at J.A.P Tech Consulting Clients as part of the MSP or other offer will be treated as Candidates for the purposes of this Privacy Policy.
- **Clients** - the name of this category speaks for itself and includes our clients and other persons to whom J.A.P Tech Consulting provides services in the course of its business or whom J.A.P Tech Consulting, for justified reasons, deems interested in our services. Delete - nowadays it is practically impossible to guarantee permanent and irreversible deletion of electronic data. In addition, as explained in this Privacy Policy, we will, in certain situations, be required by law or regulation, or for reasons related to risk management, to maintain our

ability to access certain elements of your personal data. However, we are committed to you that when the nominal retention period of your personal data expires or we receive a proper request from you to delete it, we will apply certain operational and system measures to ensure that your data is "out of use". that while this data will technically exist in an archiving system, please be assured that it will not be readily accessed by any of our Operating Systems, processes or Personnel. Only a very (and we mean extremely) small number of Senior Staff members, in very (very) (and, again, we mean exceptionally) limited and precise specific situations, will be able to restore your personal data so that it is available for inspection in those justified cases. taking into account the current goals, it should take place after seven years), we will take an additional, final step k involves "hard erasure" and therefore even this very limited number of Senior Staff members will not be able to restore your personal data.

- General Data Protection Regulation (GDPR) - a statutory instrument of the European Union aimed at harmonizing European data protection laws. Its effective date is 25 May 2018 and any reference to it should be interpreted accordingly as including any related national legislation on the protection of personal data.

- Other people we may contact - may include emergency contacts and reference contacts of Candidates and J.A.P Tech Consulting Staff. We will only contact them in appropriate circumstances.

- Potential candidates - people whom J.A.P Tech Consulting has not had contact with before, but whom it reasonably considers interested in our services and, in particular, who takes into account the position for which J.A.P Tech Consulting is looking for candidates or which it promotes, including permanent, temporary or part-time and freelancers for J.A.P Tech Consulting clients.

- Staff - includes current and former employees and interns directly employed at J.A.P Tech Consulting (or those who have accepted the employment offer), as well as certain other employees who provide or have provided services to J.A.P Tech Consulting (although they are not counted as employees). These goals also include J.A.P Tech Consulting employees who are engaged to work at the clients' premises under the terms of RPO agreements. Suppliers - refers to partnerships and capital companies, sole proprietorships and people such as independent contractors and freelancers who provide services to J.A.P Tech Consulting. In certain circumstances, J.A.P Tech Consulting will subcontract services provided to Clients to external suppliers who perform services on behalf of J.A.P Tech Consulting. In this context, suppliers who are individual contractors, freelancers or employees of the suppliers will be treated as Candidates for data protection purposes. In this context, please note that J.A.P Tech Consulting requires Suppliers to hand over the

relevant parts of this Privacy Policy (namely the parts addressed to Candidates) to their employees.

- **Systems** - include telephone, computer, internet and Wi-Fi systems, software and portals, accounts and / or networks owned, controlled or used by J.A.P Tech Consulting, which are used to transmit, initiate and / or receive communications or are otherwise methods used by J.A.P Tech Consulting, including candidate portal software and CRM systems.

- **Temporary employment relationship** - means a contractual relationship with temporary employees when they are employed directly by us.

- **Temporary workers** - includes someone who has been hired by J.A.P Tech Consulting to undertake temporary work for the Client. If you are a Temporary Employee, we will also continue to process your personal data as a Candidate during the temporary work and thereafter, in accordance with the provisions of this Privacy Policy.

- **Website users** - any person entering any J.A.P Tech Consulting website

16. Representative

We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact for the following regions: European Union (EU) Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website: <https://app.prighter.com/porta/11779146151>

17. International transfers (EU/EEA → U.S.)

We are based in the United States and work with U.S.-based clients. This means your personal data (including your CV/resume) will be **stored in the U.S.** and may be **shared with selected clients in the U.S.** for relevant roles. When we transfer your data outside the EEA, we use **Standard Contractual Clauses approved by the European Commission** and implement additional safeguards where appropriate to protect your rights. You can request a copy of the relevant transfer safeguards by contacting us using the details in this Privacy Policy.

18. Contact

J.A.P Tech Consulting LLC

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Email: **office@japtechconsulting.com**