

# LOFTWARE JOB CANDIDATE PRIVACY POLICY

This Loftware Job Candidate Privacy Policy explains what information we collect during our job application and recruitment process, how and why we use that information, and how long we retain it.

Loftware Inc, 249 Corporate Drive, Portsmouth, NH 03801, USA and its subsidiary or related entities (Loftware group) where the job position is based, are data controllers in respect of your personal data ("we" or "us" or "Loftware").

Please read this Loftware Job Candidate Privacy Policy carefully. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR) and laws implementing or supplementing the GDPR; and to the extent applicable, the data protection or privacy laws of any other country (collectively: Data Protection Law).

## DATA PROTECTION PRINCIPLES

We are compliant with Data Protection Law, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## THE KIND OF PERSONAL DATA WE HOLD ABOUT YOU

In connection with our recruitment process, we may process the following information about you:

- The information you have provided in your application, including name, title, address, phone number, email address and link to LinkedIn profile;
- The information you have provided in your *curriculum vitae*, covering or motivation letter and your portfolio or any other supporting documents you may share with us in your application (if any);
- Information on how you heard about the job position;
- The information about your educational and professional background that is available from a publicly accessible source, and we believe is relevant in the recruitment process (such as your profile on LinkedIn);
- The information about your entitlement to work in the country where the local Loftware entity is located;
- The information as to whether you have a disability for which we need to make adjustments during the recruitment process;
- The information you provide during your interview;
- The results of your expertise, behavioral assessment and responses to any assessment questionnaires that you may have undertaken as part of your recruitment process with us;

- The information from your ID or passport document (if needed to organize a live interview or for other such reasons during the recruitment process);
- The information from your labor medical examination (provided you are considered as a finalist for the position and subject to complying with the applicable laws);
- Other information you may provide during the application and recruitment process.

## **HOW IS YOUR PERSONAL DATA COLLECTED?**

We process information that is provided to us by you or acquired or produced by Loftware during the application and recruitment process (such as information provided to us by our recruitment partners and information accessible on publicly available sources).

## **HOW WILL WE USE YOUR PERSONAL DATA?**

We process your personal data to decide whether to enter into a contract of employment with you. We process your personal data to comply with legal obligations, based on your consent (for example if your sensitive data is to be processed by Loftware or stay in our talent pool and be considered for future job opportunities) and on the basis of legitimate interests. Our legitimate interest is to process your application effectively and to continuously improve our recruitment process. We are relying on Articles 6(1)(a), 6(1)(b), 6(1)(c) and 6(1)(f) GDPR as legal grounds for processing of your personal data.

In particular, we process your personal data for the following purposes:

- Assessing your skills, qualifications, and suitability for the job position with us or for assessing those against other career opportunities at Loftware, where appropriate (e.g. in case you have submitted your application as a general inquiry for job opportunities or consented to stay in our talent pool);
- Communicating with you about the application and recruitment process;
- Keeping records related to the application and recruitment process;
- Effectively proceeding with the application and recruitment process and/or preparing the contractual relationship with you, for example to assist you with obtaining an immigration visa or permit, where applicable;
- Complying with the applicable laws and regulations, legal or regulatory requirements or for purposes connected to legal claims or proceedings.

Having received your application form, and/or your CV (and covering letter, your portfolio and other supporting documents, if any) and further the result summaries from your background check, expertise, behavioral assessment, which you may be asked to complete, we process that information to decide whether you meet the requirements to be shortlisted for the role. If we decide to further consider you for the position, we may invite you to an interview and further to complete certain assessment questionnaires that will help us assess your suitability for the position. If we consider you to be a finalist for the position, then prior to making you an offer you may also be invited to undertake a medical examination with the appointed labor medicine doctor if such a medical examination is required by local labor legislation.

If you fail to provide information or undertake assessment when requested that is necessary for us to consider you for a job position, then we may not be able to process your application properly or at all.

## DATA SHARING

We may share your personal data within Loftware group of entities (even if this is not the company in which the position you applied for is based) and our third-party service providers (such as cloud service providers, system maintenance service providers and recruitment online tools providers). We may also share your personal data with other third parties, such as delivery service providers and/or other service providers we may engage in connection to coordinate your travel, or to assist you with the immigration or other matters related to the application and recruitment process.

All our third-party service providers and related companies and Loftware group entities are required to take appropriate security measures to protect your personal data. We do not allow our third-party service providers, that are acting as data processors, to use your personal data for their own purposes (we only permit them to process your personal data for specified purposes and in accordance with our instructions). Loftware discloses your personal data only to third parties who act as agents to perform task(s) on behalf of and according to the instructions of Loftware and have in place an appropriate Data Protection Agreement (DPA).

We may also share your personal data with any supervisory or any similar regulatory authority that is responsible for the enforcement of the Data Protection Law or another law enforcement authority upon their request.

## INTERNATIONAL DATA TRANSFER

We may transfer your personal data received on the basis of this Loftware Job Candidate Privacy Policy outside the European Union (EU) and European Economic Area (EEA) where the EU Commission has confirmed an adequate level of protection or where we can ensure the careful handling of personal data by means of suitable guarantees (such as valid EU Standard Contractual Clauses or EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF)).

Loftware has implemented two data protection mechanisms when transferring data from the EU, UK and Switzerland to Loftware Inc. USA. One is through the use of Standard Contractual Clauses, and the other is the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF)). The data subject (individual) can choose the mechanism that suits them better.

**EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) mechanism provisions are as follows:**

- **Data Privacy Framework Notice:** Loftware complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Loftware has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Loftware has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

- Loftware is committed to subject to the DPF Principles all personal data received from the European Union, and the United Kingdom (and Gibraltar), and Switzerland in reliance on the the DPF program.
- Loftware's internal complaint system that complies with the EU-U.S. DPF and UK and Swiss extensions is as follows:
  - In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Loftware commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF should first contact Loftware at: [privacy@loftware.com](mailto:privacy@loftware.com).
  - Loftware provides appropriate recourse mechanism free of charge to the individual. In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Loftware commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.
  - An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. The conditions can be found in [Annex I of the EU-U.S. DPF Principles](#).
- The Federal Trade Commission has jurisdiction over Loftware's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).
- Loftware must disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. if Loftware receives a request from a public authority to access Personal Data, it will (if legally allowed):
  - a. challenge the request and promptly notify the data exporter about it, and
  - b. only disclose to the public authority the minimum amount of Personal Data required and keep a record of the disclosure.

As of the day of the issue of the Privacy Policy no such request has been received.
- Loftware has responsibility for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as a sub-processor (agent) on its behalf. Loftware remains liable under the DPF Principles if its sub-processor (agent) processes such personal information in a manner inconsistent with the DPF Principles, unless Loftware proves that it is not responsible for the event giving rise to the damage.

## DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained if you write to [privacy@loftware.com](mailto:privacy@loftware.com).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## DATA RETENTION

### How long will we process your personal data?

We will retain your data 6 months after we have communicated to you our decision about whether to appoint you to role or until the revocation of your consent. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations. In case your CV and application is still interesting for any suitable alternative roles that arise we ask you for your consent to retain it longer.

The candidate can revoke the consent at any time at [privacy@loftware.com](mailto:privacy@loftware.com).

If your application is successful, your personal data collected during the application and recruitment process will be transferred to and retained in our HR files where we keep employee information.

## TALENT POOL

We are interested in staying in contact with you after the application and recruitment process is completed, on the basis that a further opportunity may arise in the future and we may wish to consider you for that. Therefore, in the application and recruitment process, we will ask you if you wish to stay in contact with us. Kindly note we can only stay in contact with you after the application and recruitment process is completed if you provide your consent. It is completely up to you to decide whether you wish to give us your consent for this. You may also choose to submit an application as a general inquiry.

If you choose to stay in contact with us, we retain your personal data for a period of 18 months after the application and recruitment process has been completed. In case you submit your application as a general inquiry, we retain your personal data for a period of 18 months after the submission. After this period (or before once you withdraw your consent), your personal data will be securely anonymized or deleted in accordance with the applicable laws and regulations.

## DATA SUBJECT'S RIGHTS

As a data subject under Data Protection Law you have a number of rights, including the right to:

- Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data when there is no lawful reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data when you have exercised your right to object to processing (see below).
- Object to processing of your personal data when we are relying on a legitimate interest as the legal basis for processing.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want to establish its accuracy.

- Request the transfer of your personal data to another party.
- File a complaint to the local supervisory authority for data protection issues. Individuals from the EU, UK and Switzerland can also lodge a complaint according to the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) mechanism, which is described in the International Data Transfer section.
- Right to choose: Loftware will only use your personal data for the purposes for which personal data was initially obtained. If Loftware intends to process your data for additional purposes beyond the original scope, it will seek your explicit consent before doing so, unless relevant privacy regulation allows otherwise. This also applies to special categories of personal data (sensitive information) and to the disclosure of this data to third parties. Loftware discloses your personal data only to third parties who act as agents to perform task(s) on behalf of and according to the instructions of Loftware and have in place an appropriate Data Protection Agreement (DPA). In addition, Loftware treats as sensitive any personal information received from a third party where the third party identifies and treats it as sensitive.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us in writing by sending an email to [privacy@loftware.com](mailto:privacy@loftware.com).

You have the right to withdraw your consent for processing of your personal data at any time (which will not affect the lawfulness of the processing before consent was withdrawn). To withdraw your consent, please contact us by sending an email to [privacy@loftware.com](mailto:privacy@loftware.com).

Once we have received notification that you have withdrawn your consent, we will no longer process your application and we will dispose promptly of (delete or anonymize) your personal data securely.

## IDENTITY OF DATA CONTROLLERS

- i. Loftware, Inc., 249 Corporate Drive, Portsmouth, New Hampshire 03801, United States of America
- ii. Loftware GmbH, Leopoldstr. 175 80804, München, Bayern Germany
- iii. GAP Systems Ltd., C/O RSM Fifth Floor, Central Square, 29 Wellington Street, Leeds, England, LS1 4DL
- iv. Loftware Asia Pacific Pte. Ltd., 171 Chin Swee Road #07-02 CES Centre, Singapore 169877
- v. Loftware UK Ltd., Central Square, 5th Floor, 29 Wellington Street, Leeds, England LS1 4DL
- vi. NiceLabel International Limited, 2 Ashgate Road, Chesterfield, Derbyshire, S40 4AA, UK
- vii. Euro Plus d.o.o., Poslovna cona A 2, SI-4208 Šenčur, Slovenia
- viii. NiceLabel GmbH, Mendelssohnstraße 87, 60325 Frankfurt am Main, Germany
- ix. NiceLabel Asia Pacific PTE Ltd., 138, Cecil Street, #12-01A, Singapore (069538)
- x. NiceLabel Software Co. Ltd., Chuangzhan Building, Room 1106, No.928 Xikang Rd, 200040 Shanghai, China
- xi. PrisymID Limited, C/O RSM Fifth Floor, Central Square, 29 Wellington Street, Leeds, England, LS1 4DL
- xii. PrisymID Support Service Limited, C/O RSM Fifth Floor, Central Square, 29 Wellington Street, Leeds, England, LS1 4DL

- xiii. GAP Systems Asia Ltd., 16F Shing Lee Commercial Building, 8 Wing Kut Street Central, Hong Kong
- xiv. GAP SYSTEMS CHINA LIMITED, RiSheng Building, Room 1010, Minkedong RD, Shiqi, Zhongshan, Peoples Republic of China

## EU DATA PROTECTION OFFICERS

We have appointed a group data protection officer (DPO) to oversee compliance with this Privacy Policy. If you have any questions about this Privacy Policy or how we handle your personal data, please contact our DPO at [privacy@loftware.com](mailto:privacy@loftware.com).

Data Protection Officer for NiceLabel Germany GmbH located at Bürgermeister-Mahr-Straße 32, 63179 Obertshausen is DataGuard, DataCo GmbH, Nymphenburger Str. 86, 80636 Munich, Germany. Written inquiries, requests or complaints to our German Data Protection Officer may be addressed to [privacy@loftware.com](mailto:privacy@loftware.com).

## WHO IS RELEVANT DATA PROTECTION AUTHORITY OF LOFTWARE IN THE EU?

Loftware's lead data protection supervisory authority is in Republic of Slovenia, Informacijski pooblaščenec Republike Slovenije and can be reached at Lesnina, Dunajska c. 22, 1000 Ljubljana. If you are in any other EU or EEA country, you may find the contact details of your competent data protection supervisory authority [here](#).

## CONTACT US

If you have questions or concerns about this Privacy Policy, please contact us through one of the following ways:

1. for privacy questions and exercising your rights via our email: [privacy@loftware.com](mailto:privacy@loftware.com).
2. our data protection officer: [privacy@loftware.com](mailto:privacy@loftware.com);
3. for reaching out to our German DPO representative: DataGuard, DataCo GmbH, Dachauer Str. 65, 80335 München, Germany. Written inquiries, requests or complaints to our German Data Protection Officer may be addressed to [privacy@loftware.com](mailto:privacy@loftware.com).

## CHANGES TO PRIVACY POLICY

We may change this Loftware Job Candidate Privacy Policy from time to time. When this happens, we will post the changes or the new version of the Privacy Policy on this website. Each version is identified with a number and the effective date at the bottom of the page.

Loftware Candidate Privacy Policy – v.1.3, last update on June 2, 2025.