

## **Privacy Notice and Consent for New Applicants**

The General Data Protection Regulation (GDPR) regulates the way that we manage the data of job applicants. During this early phase of the application process, Coinbase Ireland Limited and Coinbase Custody International Limited (hereinafter, "Coinbase") will be gathering and processing personal information (your data) in order to assess your suitability for the role in which you have applied. If you are unsuccessful during any point of this process then we are legally required to keep your data on file, for a period of time. We will keep your data in order to comply with employment law obligations only and for no longer than obligated to do so.

Under GDPR, we need your consent to process your application. With this form, we are providing you with notice on how your data will be processed as part of the application procedure. By signing this form, you are agreeing to our use and processing of your data as required.

### **Data controller details**

Coinbase is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows:

Coinbase Ireland Limited | Coinbase Custody International Limited

70 Sir John Rogerson's Quay,

Grand Canal Dock, Dublin 2

Ireland

Email - [dpo@coinbase.com](mailto:dpo@coinbase.com)

### **Data protection tenets**

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way;
- collect your data only for reasons that we have stated in this document;
- only use it in the way that we have told you about;
- ensure it is correct and up to date;
- keep your data for only as long as we need it; and
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

### **Types of data we process**

We hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers;
- biological sex;
- interview transcript/notes; and
- information contained within your CV including references, education history and employment history.

## **How we collect your data**

From the start of this process we will begin to gather information about you. This includes the information you would normally include in a CV or a recruitment cover letter, or notes made by our Talent recruiting team during a recruitment interview.

In some cases, we will collect data about you from third party employment agencies, this information will only be passed to us from the employment agency upon your consent.

Personal data is kept in personnel files or within Coinbase HR third party business systems and IT systems. The access to these systems is limited to those job roles where it is essential to access your records.

## **Why we process your data**

The law on data protection allows us to process your data for certain reasons only, the reasons relevant to you during this process are:

- in order to carry out legally required duties;
- in order for us to carry out our legitimate business interests; and
- to protect your interests.

All processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first two reasons set out above to process your data. We need to collect your personal data to assess your suitability for the advertised role.

We also need to collect your data to ensure we are complying with legal requirements such as:

- making reasonable adjustments for disabled employees; and
- tracking our fair employment process.

## **Special categories of data**

Special categories of data may include:

- health;
- sexual orientation;
- race;

- ethnic origin; and
- religion.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing;
- we must process the data in order to carry out our legal obligations; and
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring (as is our legal obligation); and
- to determine reasonable adjustments (as is our legal obligation).

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we will ask for your consent to gather the information in the first place. You will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld, in the context of special data. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

## **Protecting your data**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented GDPR compliant processes to guard against such.

Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organizational measures to ensure the security of your data.

## **How long we keep your data for**

In line with data protection tenets, we only keep your data for as long as we need it. If unsuccessful during the application process we will keep your personal details, interview notes and your CV details, is kept for 12 months or as long as is necessary to comply with applicable immigration law (whichever is shorter).

Successful applicants will be provided with an employee privacy notice as part of the on-boarding process.

## **Providing Consent**

Coinbase is committed to complying with the GDPR. You are entirely in control of your decision to give consent to our use of your data as requested in this form. You do not need to give consent. However, in order for Coinbase to assess your credentials you will need to supply consent in order for us to process your application.

## **Withdrawing Consent**

You have the absolute unrestricted right to withdraw your consent at any time. We will stop processing the data for which you have withdrawn your consent. Please note however, we must keep some personal data in order to comply with employment regulation.

## **Change in Purpose**

If the purpose of using the data for changes, we will seek new consent, setting out the new purpose. You can decline to give your consent, with no repercussions. Consent can again be withdrawn at any time once given.

## **Making a Complaint**

The supervisory authority in Ireland for data protection matters is the Data Protection Commission ("DPC"). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the DPC. You may lodge a complaint by emailing [info@dataprotection.ie](mailto:info@dataprotection.ie) or writing to the following address: Data Protection Commission, Canal House, Station Road, Portarlinton, R32 AP23 Co. Laois. You can visit the website of the Data Protection Commission at [www.dataprotection.ie](http://www.dataprotection.ie) for more details.

## **Data Protection Officer**

Coinbase's Data Protection Officer is Paul Barks. Contact details are:

[dpo@coinbase.com](mailto:dpo@coinbase.com)