

# Recruitment Privacy Notice

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Each member of JetBrains Group treats privacy as an integral part of their obligations toward job candidates and internship applicants. JetBrains Group includes the entities listed here, where you can also find contact details for each member.

This document provides information about what types of personal data we process within the recruitment and internship selection process. You will find information about the processing of your personal information based on your consent or other legal reasons, for what purposes we process the data, whether we pass it on to you, and what rights and responsibilities you have in connection with processing your personal information.

## Who Is Responsible for Your Data (Data Controller)

If you apply for a job or internship position, the hiring JetBrains Group company in the country where the position is open will be the data controller. Since JetBrains operates globally, some processes may be decided in a centralized manner, which also includes decisions in the recruitment process. For this reason, additional controllers of your data processed in connection with your application will also be JetBrains GmbH, JetBrains N.V., and JetBrains s.r.o. (these entities are the controllers for all remote positions). The controllers are hereinafter jointly referred to as “we”.

We determine the categories and purposes of personal data to be processed in the course of the recruitment process. We control the processing of the data and we are responsible for the processing of your personal data. We receive personal data from you or from references you specify while applying for a job position or internship. Please carry out your rights as described in this notice with the JetBrains company with which you have or plan to have a contractual relationship. In certain circumstances, and with your approval, we may share your personal data with a third-party controller if it is necessary in order to achieve the desired results of the recruitment process. Third-party controllers process your personal data in accordance with their documentation, which they will make available to you.

## What We Collect

We collect and process personal data listed in this section for the above defined purposes. Specifically, this includes:

- a. **identification data**, which includes, but is not limited to, your first and last name, gender, title, date of birth, and photo;
- b. **contact details**, which means personal information that allows us to contact you, such as address, phone number, and personal email address;
- c. **data related to work or study performance**, such as information about your education, training, previous experience, and references;
- d. **identifiers and copies of official documents (as necessary)**, which may include copies of your passport, residence and work permits, social security, etc.;
- e. **assessment of your suitability**, which means the data we use to assess whether you are a suitable candidate for a particular position, especially our assessment of your performance at an interview and test results. Depending on the requirements of the position you apply for, we may ask you to complete a personality assessment test or a career aptitude test.

## Why We Collect Your Personal Data

Within the recruitment or internship selection process, we process your personal data for the following purposes:

- a. **Hiring process and internship selection process.**

During the selection process, including the screening of candidates, we make use of identification and contact details, job performance data, and data on your suitability for the position in question.

After that, personal data is processed under the legal title of performance of the contract and implementation of pre-contract arrangements, i.e. preparation of an employment contract or internship agreement. We keep your personal information for the duration of the recruitment process, unless you consent to its further retention in our candidate database.

- b. **Keeping your information to contact you with relevant job offers within 10 years.**

Based on your consent, we store your information in our candidate database and thus process your identification, contact details, and performance data to contact you with any relevant future job offers. We can also use your data from the candidate database to better understand what kinds of job candidates are interested in the careers we have to offer. With your consent, we may process the data for up to 10 years after the end of the recruitment process. You may withdraw your consent at any time by contacting [privacy@jetbrains.com](mailto:privacy@jetbrains.com). All data processing before revocation of your consent remains valid.

- c. **Keeping your information for the purposes of protection against future lawsuits.**

Based on our legitimate interest, we may keep some portion of your data necessary for us to defend ourselves in case of future lawsuits.

- d. **Keeping the minimum amount of information necessary for the purposes of maintaining an opt-out list.**

- e. **Contract preparation and onboarding processes.**

To ensure a seamless onboarding process based on legitimate interest, if we send you an offer and you accept, we will create internal accounts for you (for example, an email account, a JetBrains account, or an intranet profile that includes your name, office location, job title, team name, and start date).

We also collect the information necessary to prepare a contract once you have accepted our offer, which includes, in particular, first and last name, title, date of birth, permanent address, and personal email address.

### **Sharing with Third Parties**

For the processing of personal data, we use third-party services that process personal data on our instructions for carrying out the recruiting process, such as Google or Slack. We are also obliged to pass the processed personal data to state authorities, courts, law enforcement agencies, and supervisors, if they so request.

Based on the type of your application, your personal data may also be shared with other members of JetBrains Group (if needed for assessment of your suitability for the given position), which may include entities based in countries other than the European Economic Area (EEA). We have implemented EU Standard Contractual Clauses to provide for the security of your personal data within the entire JetBrains Group. As a result, your personal data may be safely shared with other JetBrains Group companies located in countries outside the EEA.

### **Security**

We review the processes of personal data usage before implementing them. This is done to minimize data usage and to make sure that you as the data subject are informed about the processing. When the reason for data storage expires, we remove your personal data from our servers or anonymize it for further usage.

While choosing third-party partners, we ascertain their compliance with legal regulations and security standards to make sure your data is stored in a secure location with appropriate security measures in place.

### **Your Rights**

Your rights regarding the processing of your personal information. Just as we have our rights and obligations to process your personal information, you also have certain rights to process your personal data. These rights include:

- a. **Right of access:** In accordance with Art. 15 GDPR, you may have the right to obtain confirmation from us as to whether or not your personal data is processed by us, and, where that is the case, to request access to your personal data. The information about personal data processing includes the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipients to whom your personal data have been or

may be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access. Also, you may have the right to obtain a copy of your personal data undergoing processing. For additional copies requested, we may charge a reasonable fee based on administrative costs.

– b. **Right to rectification:** In accordance with Art. 16 of the GDPR, you may have the right to obtain from us the rectification of inaccurate personal data. Depending on the purposes of the processing, you may have the right to have any incomplete personal data completed, including by means of providing a supplementary statement.

– c. **Right to erasure (right to be forgotten):** In accordance with Art. 17 of the GDPR, you have the right to request that we delete your personal data. Please keep in mind that we may keep your personal data if it is still necessary for:

- i. the fulfillment of our legal obligations;
- ii. archival, historical, scientific research, or statistical purposes; or
- iii. the determination, exercise, or defense of our legal claims.

– d. **Right to restriction of processing:** In accordance with Art. 18 GDPR, you have the right to request that we restrict the processing of your personal data. In this case, the respective personal data will be marked accordingly and may only be processed by us for certain purposes.

– e. **Right to personal data portability:** In accordance with Art. 20 GDPR, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format and/or to request the transfer of this personal data to another entity.

– f. **Right to object:** If you have given your consent to the processing of your data in accordance with Art. 7(3) GDPR, you may revoke your consent at any time in the future. The declaration of revocation must be addressed to the employer and must be presented in writing or delivered by email or fax.

– g. **Right to file a complaint to a supervisory authority:** You may lodge a complaint related to the processing of your personal data with a European country data protection supervisory authority. The contact details of data protection supervisory authorities for individual countries are available [here](#).

### Changes to This Notice

This privacy notice is current as of the effective date set forth above. We may change this privacy notice from time to time, so please be sure to check back periodically. We will post any changes to this privacy notice on JetBrains' website. If we make any changes to this privacy notice that materially affect our practices with regard to the personal data we have previously collected from you, we will endeavor to provide you with an advance notice of such change by highlighting the change on JetBrains' website.

### Contact Us

If you have any questions about exercising your rights regarding your personal data, please email us at [privacy@jetbrains.com](mailto:privacy@jetbrains.com). We will resolve your request without undue delay, but within a maximum of **one** month. In exceptional cases, especially for complex requests, we are entitled to extend this period by another two months. We will inform you of any such extension and its justification.