

# Depop Candidate Privacy Policy

At Depop, we care deeply about privacy. We believe in transparency, and we're committed to being upfront about our privacy practices, including how we treat your personal information. We know you care about your privacy too, so we've set out the following policy to explain what information we collect when you apply for a job at Depop, how we use and share such data, and your rights related to your personal information.

## **Scope**

This privacy policy ("Policy") describes how Depop Ltd., Depop, Inc., and their subsidiaries, affiliates, and related companies, (collectively "Depop", the "Company" or "we" or "us") collect, use and protect personal information which is provided to Depop in connection with the recruitment and hiring process. If you are an employment candidate, this Policy explains your rights regarding the collection, use, storage, retention, sharing and protection of your personal information by Depop.

By submitting your application for employment with Depop, you indicate that you have read and understand that your personal information may be used in the ways described in this Policy. Please note that we cannot process your application for employment if you do not provide your personal information and acknowledge that we will use it in the ways set out in this Policy.

The Depop entity to which you submit an application for employment, along with other Depop entities which may be involved in the recruitment process, act as joint controllers of your personal information - which means Depop and its affiliates jointly determine how to use your personal information in connection with your application - but only as described in this Policy.

Please note that your personal information may be used to assess your suitability for various roles at Depop, not just the position applied for. Your personal information may be shared between different Depop entities and their affiliates for this purpose.

## **Your Personal Information**

When used in this Policy, the term "personal information" means any data that directly or indirectly identifies an individual, such as a name, phone number, or one or more factors specific to that individual (e.g. cultural or social identity).

## **Categories of Personal Information Processed**

Depop collects and processes different categories of your personal information, to the extent permitted under applicable laws, including:

- contact information, such as your name, address, phone, email, and other similar information;
- CV/resume, cover letter, previous work experience, education, and transcripts;
- desired salary, relevant work experience, type of employment sought, date available, and employee referral;
- Information from background checks, where permitted by law;
- language and other relevant skills; and
- information relating to references.

### **Purposes of Processing Your Personal Information**

The Company will collect, use, and process your personal information in order to:

- verify your identity;
- process your application for employment;
- assess your fitness for the position(s) applied for (and other suitable positions) and make decisions;- regarding your prospective employment;
- communicate with you;
- demonstrate the Company's compliance with equality and other applicable laws; and
- comply with any legal obligations imposed on Depop.

It is in our legitimate interests to process your personal information for these purposes as such use allows us to hire appropriate candidates, and to administer our recruitment function.

Sensitive personal data will not be processed, except with your explicit consent or to the extent necessary or permissible under applicable laws. When used in this Policy, the term "sensitive personal data" means information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, and information about health or sex life.

If you accept employment with Depop, the information collected will become part of your employment record and will be used for employment purposes.

### **Sharing Your Personal Information with Third Parties**

Depop may disclose your personal information to:

- Third party service providers;
- Legal counsel and other advisors; and
- In the case of a sale, change of control or transfer of all or part of the assets of Depop, or its parent company, Etsy, Inc., and the Etsy group of companies (or any of its component entities), to a purchaser or investor (or potential purchaser or investor) and their advisors.

Further, we may provide data to a third party if we believe in good faith that we are required to do so for legal reasons or that this is necessary to prevent harm or injury to us, our staff or members of the public, or if we need to do so to defend

our legal rights. For example, we may provide personal information if we are ordered by a court to do so.

### **Data Transfers**

Depop is a global company. As part of the recruitment process, and to achieve the purposes set out in this Policy, we may need to transfer your personal information outside of the European Economic Area ("EEA") or the United Kingdom. The European Commission and the United Kingdom has adopted standard data protection clauses (also known as Model Clauses) which provide safeguards for personal information that is transferred outside of Europe or the U.K. To the extent that we transfer personal information including employment candidate data, outside of the EEA or the UK, we do so in accordance with these Model Clauses.

You can request a copy of our Model Clauses by emailing [dpo@depop.com](mailto:dpo@depop.com).

### **Security**

Depop will take appropriate measures to protect Personal Information that are consistent with applicable privacy and data security laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of Personal Information and to protect against unauthorized or unlawful processing of Personal Information, or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Information.

### **Updating Your Data / Your Rights**

Subject to certain exceptions and applicable law, you may request access to, or that we correct, suppress, restrict use, anonymize or delete Personal Information about you or you may object to the processing of Personal Information, or request a copy of your Personal Information or to port your Personal Information (as permitted by applicable law). Personal information demonstrating compliance with the eligibility and selection criteria may not be updated or corrected after the closing date for applications. We will respond to your request consistent with applicable law. To exercise your rights, you may contact us with your request at the contact information listed below. Some of your rights may be exercised directly by you in your account settings within our applicant tracking system. Please note, however, that certain Personal Information may be exempt from requests pursuant to applicable data protection laws or other laws and regulations.

### **Retaining Your Information**

Depop will retain your personal information for as long as necessary in light of the above purposes, in particular for such period as is required to demonstrate compliance with law. We may also keep your personal information for a longer period if we believe that you may be a suitable candidate for future positions and we tell you that we are keeping your personal information for this purpose. Depop does

not retain your personal information submitted in connection with your application for longer than 1 year (unless you are hired).

### **Contact Depop**

Send an email to our People team at [people@depop.com](mailto:people@depop.com).

Write to us at the following address:

Depop People Team: 20 Farringdon Road, London, EC1M 3HE.

In addition, if you have any questions, or if you would like to make a request to exercise one of your legal rights, you can contact our Data Protection Officer using the details below. A Data Protection Officer is someone responsible for overseeing how we comply with data protection laws and dealing with questions about this Privacy Policy or requests from you.

Name: Aphaia Ltd

Email address: [dpo@depop.com](mailto:dpo@depop.com)

Postal address: Eagle House, 163 City Road, London, EC1V 1NR, United Kingdom.