



Coin Metrics (U.K.)
Limited
205a High Street
West Wickham
Kent, England BR4 0PH

Coin Metrics Ireland
Limited
104 Lower Baggot Street
Dublin 2 Ireland D02 Y940

Coin Metrics Inc.
125 High Street,
Suite 220
Boston, MA 02110

info@coinmetrics.io
coinmetrics.io

Coin Metrics Applicant Fair Processing Notice

Coin Metrics (U.K.) Limited, Coin Metrics Ireland Ltd., and Coin Metrics Inc. here referred to collectively as “the Company”/ “Coin Metrics”, is committed to protecting the privacy and security of your personal information (also referred to herein as personal data).

This privacy notice describes how we collect and use personal information about you, to the extent regulated by the GDPR or to the extent that you reside in a jurisdiction that requires that Coin Metrics provide a privacy notice to you in your capacity as an applicant for employment (each, a “Covered Jurisdiction”), to evaluate whether or not to enter into an employment relationship or an independent contractor engagement with you. Such personal information may be obtained from you, from third-party sources, and/or from publicly available sources. This privacy notice and all obligations and other terms set out within it apply equally to you irrespective of whether you reside within the UK (in which case the applicable law is the ‘UK Data protection Act 2018 (General Data Protection Regulation)’) OR if you reside within the EU or the European Economic Area (in which case the applicable law is the EU General Data Protection Regulation (EU) 2016/679. We refer to both laws, to the extent applicable, in this privacy notice as “the GDPR”. This privacy notice also applies to you if you reside in a Covered Jurisdiction.

Coin Metrics is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under the GDPR (or to the extent applicable, we may be required under the relevant law in a Covered Jurisdiction) to notify you of the information contained in this privacy notice.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice together with any other privacy notice we may provide to you on specific occasions when we are collecting or processing personal information about you so that you are aware of how and why we are using such information.

Please note that if you intend to provide us with information of a reference or any other third party as part of your application process, it is your responsibility to obtain consent from that third party prior to sharing their information with us.

1. Contact details

If you have any questions about this privacy notice or how we handle your personal information, please contact us at privacy@coinmetrics.io.

2. The Data Protection Principles

When we process your personal data, we will always apply the core principles of the GDPR designed to ensure that it is:

- i. Used lawfully, fairly and in a transparent way

- ii. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- iii. Relevant to the purposes we have told you about and limited only to those purposes
- iv. Accurate and kept up to date
- v. Kept only as long as necessary for the purposes we have told you about
- vi. Kept securely

3. Your Data

In this section we outline the purposes for which we may collect and process your personal data. For each ‘purpose’ we also list the types of data we may process and our legal basis for the processing of it. The types of data listed are strictly non-exhaustive and there may from time to time be additional data that we require to be processed but only in accordance with the GDPR (where applicable) and other applicable laws as necessary to allow us to evaluate whether or not to enter into an employment relationship or an independent contractor engagement with you or where there is another legal basis pursuant to the GDPR or other applicable law permitting us to do so.

a) Recruitment and Selection

- Making decisions relating to your recruitment
- Determining the terms of an offer of employment or engagement
- Checking that you are legally entitled to work in the country of potential employment or engagement

| | |
|---|---|
| Types of personal data processed | <ul style="list-style-type: none"> • Personal contact details (telephone numbers, email addresses and address) • Name • Prior employment history (name of prior employer, tenure, job title, prior salary and benefits) • Education and training history (institutions, qualifications, grades, courses attended and references) • Other demographic information may be requested as applicable |
| Lawful basis for processing personal data | <ul style="list-style-type: none"> • To comply with a legal obligation to ensure a candidate has the lawful right to work (applying GDPR Art. 6.1c - compliance with a legal obligation) • To ensure we select the best candidates for employment or engagement based on their experience and ability is deemed to be construed as a lawful basis for processing personal data (applying GDPR Art. 6.1f - a legitimate interest) • To check whether you have criminal convictions and/or any other relevant regulatory convictions (when it is required and authorized by law and with appropriate safeguards for the rights and freedoms of data subject - applying GDPR Art. 10) |

b) Monitoring

- To track entry and exit of building/car parks to ensure the physical security of our office sites (to the extent permitted by law)
- To monitor your use of our applicant tracking system to improve and evaluate such system

| | |
|---|--|
| Types of personal data processed | <ul style="list-style-type: none"> • CCTV footage if applicable and other information obtained through electronic means such as swipe card records (to the extent permitted by law) |
| Lawful basis for processing personal data | <ul style="list-style-type: none"> • To safeguard the security of our business (applying GDPR Art. 6.1f - a legitimate interest) • To assist in investigations relating to applicant conduct (applying GDPR Art. 6.1f) |

c) Administration

- Business management and planning
- Dealing with legal disputes and regulator enquiries
- Preventing fraud
- Complying with health and safety obligations
- Time management
- Coordinating travel
- Coordinating building/carpark access (as applicable)

| | |
|---|---|
| Types of personal data processed | <ul style="list-style-type: none"> • Personal contact details (telephone, email, address) • Name • Gender and/or pronouns • Date of birth • • Details of qualifications • Current and historic job titles • Individual requirements under health and safety regulations |
| Lawful basis for processing personal data | <ul style="list-style-type: none"> • To comply with record keeping obligations (applying GDPR Art. 6.1c- compliance with a legal obligation) • To comply with labor law standards (applying GDPR Art. 6.1c - compliance with a legal obligation) • To enable effective management and financial reporting (applying GDPR Art. 6.1f - a legitimate interest) |
| Lawful basis for processing 'special categories' of personal data | <ul style="list-style-type: none"> • We may use information about your physical or mental health or disability status to ensure your health and safety and to assess your fitness to work, to provide appropriate adjustments (applying GDPR Art. 9.2b) • We may use trade union membership information to comply with employment law obligations (applying GDPR Art. 9.2b) |

d) Diversity, Equality and Inclusion

- Equal opportunities monitoring and initiatives

- Managing discrimination and harassment claims and investigations

| | |
|---|---|
| Types of personal data processed | <ul style="list-style-type: none"> • Information about your age, gender and/or pronouns, race or ethnicity, marital status and other demographic information as permitted by local law |
| Lawful basis for processing personal data | <ul style="list-style-type: none"> • To ensure meaningful equal opportunity monitoring, reporting and initiatives (applying GDPR Art. 9.2b and g) |

4. If you reside in the UK or EU, do we need your consent?

Under the GDPR, consent is not considered a lawful basis for processing in situations where there is an imbalance in power, such as potentially in connection with an application for employment. Therefore, instead of seeking your consent we are required to apply one of the other legal bases - those outlined in Article 6 of the GDPR, namely:

- To enable us to comply with legal obligations, and
- Using your personal information to pursue legitimate interests of our own provided your interests and fundamental rights do not override those interests.

For ‘special categories’ of your personal information (health data, race or ethnicity, nationality, gender and/or pronouns, trade union membership and any other categories that are applicable to the Company) we must rely on one of the legal bases detailed in Article 9 of the GDPR - namely, where:

- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law insofar as it is authorized by UK law or as appropriate by EU or relevant EU Member State law or a collective agreement pursuant to UK law or as appropriate by EU or relevant EU Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
- Processing is necessary for reasons of substantial public interest on the basis of UK law or as appropriate EU or relevant EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

For information about criminal convictions, in accordance with Art. 10 GDPR, we may only use this data where the law allows us to do so. We do not envisage that we will hold information on criminal convictions, however there may be circumstances where the nature of a role requires us to request this information and if this is the case you will be provided with prior notification.

For each of our processing activities, as listed in the tables above, we have also detailed the legal basis that allows us to process your data.

5. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to continue the application process or we may be prevented from complying with our legal obligations.

6. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose and that purpose is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

7. Will your personal data be subjected to automated decision-making?

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision based on any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must put in place appropriate measures to safeguard your rights.

We do not envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if this position changes.

8. Data Sharing

We may have to share your data with third parties including third-party service providers and other entities in our affiliate group. We require third parties to respect the security of your data and to treat it in accordance with applicable data protection laws. We may transfer your personal information outside the UK or as relevant outside of the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

9. Third Parties

We may share your personal information with third parties where required by law, where it is necessary to facilitate the application process with you or where we have another legitimate interest in doing so. Third parties include third-party service providers (including contractors and designated agents) and other entities within our affiliate group.

The following activities are routinely carried out by third-party service providers but this list is strictly non-exhaustive and from time to time we may within our discretion share your personal information with such other third-party service providers as necessary to ensure directly or indirectly that we can continue the application process with you and therefore have a legitimate interest in doing so:

- HR consulting
- IT services
- Delivery and maintenance of internal and external information systems
- Security of internal and external information systems

We will share your personal information with other entities in our group as part of our regular reporting activities on Company performance, in the context of a business reorganization or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

All our third-party service providers and other entities in our affiliate group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes, in accordance with our instructions and under the terms of a data processing agreement.

10. Transferring information outside of the UK/EU

If you are a UK or EU resident, we may transfer the personal information we collect about you to countries outside the UK or as relevant outside the EU.

There is not necessarily an adequacy decision by the UK or as relevant the EU in respect of all such countries which means they are not necessarily deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place relevant appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the applicable data protection laws.

You can contact us if you require further information about these protective measures.

11. The period for which data is stored

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an applicant we will retain and securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

12. Data Security

We have put in place appropriate security measures designed to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

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.

13. Your rights

Under certain circumstances, by law you may have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- Request correction of the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information subject strictly to the relevant provisions of the GDPR (where applicable) and/or other applicable laws or related regulatory provisions. This enables you to ask us to delete or remove (strictly as subject to and permitted by the relevant laws) personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please put a request in writing to privacy@coinmetrics.io.

As stated above, the processing of your personal data is based on legal bases other than your consent. However, in the very limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specified purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us at privacy@coinmetrics.io. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

14. No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

15. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

16. Raising a complaint

If you are unhappy with the way in which your personal information has been processed, you may in the first instance contact us at privacy@coinmetrics.io.

You can also reach us at the following addresses:

Coin Metrics (U.K.) Limited
205a High Street
West Wickham
Kent, England BR4 0PH

Coin Metrics Ireland Limited
104 Lower Baggot Street

Dublin 2 Ireland D02 Y940

Coin Metrics Inc.
125 High Street, Suite 220
Boston, MA 02110

If you remain dissatisfied, then you have the right to apply directly to the UK Data Protection Authority for a decision where you are a UK resident - contact details below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
United Kingdom
Telephone: 0303 123 1113

If you reside within an EU Member State, then you have the right to apply directly to the relevant national data regulatory authority within your particular Member State.

17. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time and we will notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.