



Candidates Privacy Notice

Last updated in February 2026

At Super, we take the protection of your privacy and personal data very seriously. We want you to understand how we protect your privacy when we obtain personal data from you, how we use your data, what your rights are in this respect and how we safeguard it while you apply to job openings, visit our websites or use their functionalities. For this reason, we are providing you with this Privacy Notice which we kindly ask you to read before you engage with us further.

By applying to one of our job openings, you acknowledge that you have read our Privacy Notice and understood that any personal data you provide to us is supplied at your own free will and shall be used in accordance with the purposes described in this Notice. If you do not understand this Privacy Notice, we recommend you request additional information.

We reserve the right to change and/or update our Privacy Notice at our discretion and at any time. You will be notified accordingly and in advance about these changes and or updates, which we kindly ask you to read carefully and make sure you understand the changes.

1. General Information

Super Technologies (hereinafter referred to as “Super”) and its affiliates (Super Technologies includes all its entities. For ease of reference, all are referred to as “Super”) process your personal data in accordance with:

- EU General Data Protection Regulation 2016/679;
- UK General Data Protection Regulation and Data Protection Act 2018;
- Serbian Data Protection Law 87/2018;
- Brazilian General Data Protection Law (Lei Geral de Proteção de Dados Pessoais), Law No. 13,709/2018;
- Any other applicable data protection local laws.

This Privacy Notice only applies to the processing of Personal Data of candidates for which Super is a Controller as described under the above-mentioned Data Protection Laws.

The Super entity that recruits you is the responsible data controller for all data processing activities described in this Privacy Notice.

2. What personal data we collect about you and why?

As used in this Privacy Notice, **‘personal data’** means any information that can be used to individually identify you, directly or indirectly, alone or along with other information. The categories and volume of personal data that we collect vary depending on: i) the activities you choose to undertake in relation to the recruitment process we provide you and ii) our purposes for processing. Generally, we will collect your personal data in the following manner:

Directly from you:

- Data provided in your CV and Cover Letter;
- Data collected through the vendors whose services we use (e.g. Greenhouse);
- Data provided on our application form, including but not limiting to name, telephone number, personal email address LinkedIn profile, home location, passport/ VISA information, and any data you provide us during interviews at our premises.

Indirectly from you:

- From publicly accessible sources, such as LinkedIn or other board jobs;
- Personal data provided to us about you by your referrers (when applicable);
- When we ask for recommendations & references about your current or previous professional activities;
- When we conduct background checks;

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By law, we must have a lawful reason for processing your personal data. The data we collect about you will only be used for the purposes stated below in this Privacy Notice, to perform our contractual obligation towards you, to comply with our legal obligations and to protect our legitimate interests in specific circumstances.

Purpose of processing	Personal data collected and processed	Lawful basis for processing
Start recruitment process, including an invitation to an interview	Personal data contained in your CV and Cover Letter, including but not limited to your name, surname, your experience, education, home address	Legitimate interest* - choose the best suited workforce for the Super's needs
Reference check process	Full name, Job title, Company, email address	Consent
Preparing employment offer and contract	Name, surname, bank account, home address, copies of IDs, background checks (if applicable)	Taking steps at your request prior to entering into a contract for a job within Super
Whistleblowing or other legal actions	Identification data such as first name, last name, phone number, and email address. Data related to the case or specific proceedings.	Legal obligation
Assess your suitability for a role	Data collected directly from you(see above) or indirectly from publicly accessible sources, referrals, recommendations	Our legitimate interest* to decide whether to appoint you to the role as the most suitable person.
Provide you with information on various employment opportunities within Super	Name, personal e-mail address, all data collected through recruitment process, professional interests	Consent
Background screening**	Educational, professional, legal, financial and/or criminal history checks as applicable and on a case by case basis	Legitimate interest* - protecting Super's Assets and Reputation from Fraud and Financial Risk and ensuring Workplace Safety

*Where we rely on legitimate interest as a ground for processing your personal data, we always carry out an assessment to ensure that your fundamental rights, interests and freedoms are not outweighed by our legitimate interests. You have the right to object at any time and we will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

** Background screenings are conducted for certain key positions only. The process might differ from one jurisdiction to another, taking into account local legal requirements and limitations.

Once collected, we shall at all times ensure that any processing of personal data is carried out in compliance with applicable laws, with this Privacy Notice and for the purpose for which you submitted your data to us.

While blowing the whistle, particularly in the case of anonymous reports, we hereby inform you that the data controller responsible for the processing of your personal data will notify you with supplementary privacy notice about processing your data.

3. What happens if you do not provide or allow us to use your personal data?

You can decide at any time not to provide us with the requested personal data. However, if you refuse to share your personal data with us when requested, we may not be able to complete your recruitment process (for example, if refuse to provide us with your CV or diplomas, we cannot assess whether you are qualified for the position).

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Your refusal to share your personal information with us in order to benefit from certain future opportunities may also limit the opportunities and offers we may offer you.

4. Who do we share your personal data with?

We will never share your personal data with any third party who intends to use it for commercial purposes, unless we have expressly informed you and you have given us explicit permission to do so. In certain circumstances described below, we will share a minimum amount of personal data as follows:

- 1) Other companies of Super for the purpose of internal assistance, administrative matters and daily activities in line with this Privacy Notice. In situations where we share your personal data for other purposes than those mentioned above, we will always ask for your consent.
- 2) Service providers authorised to process personal data who are acting as our contractors, for the purpose of managing our activities, such as: service providers that offer technical support to our IT infrastructure, recruitment tools & solutions analytics, hosting providers, screening platforms, etc;
- 3) Based on legal obligations. In this regard, please note that there may be legal obligations on our part to share your personal data with local authorities (such as tax authorities, the National Gambling Office, the police, the courts) if required by applicable laws. We may also share your personal data in good faith in order to protect, secure or prevent the loss of our rights or in the legitimate interests of Super, its customers or the general public, or to respond to complaints from others.
- 4) In the event of our reorganization, merger or acquisition by another company or in the event of the transfer of our business on the basis of our legitimate interest in consolidating, expanding or streamlining our business. In any of the situations listed, the person receiving the data may have access to the data we store, including your personal data, always in accordance with applicable law.
- 5) Based on consent in cases where your personal data is transferred to any other third party where you have consented or requested that we do so.
- 6) We may transmit aggregate statistical data or survey results, but this data will be anonymised and will not contain personal data.

5. Where is your personal data stored?

Your personal data will be kept, processed and stored by us and our service providers in the following territories: the European Union, European Economic Area, the United Kingdom, Serbia, Brazil and USA.

Each of our service providers who process and store your personal data have an obligation to keep it protected and secured, in accordance with applicable industry standards and whether less stringent legal provisions apply in their jurisdiction.

Where such recipients of data are located in third countries for which Local Data Protection Authorities have not issued an adequacy decision, Super has in place contractual relationships with each such recipient that include standard contractual clauses intended to ensure an adequate level of protection and will always conduct rigorous due diligence to ensure there are no risks to such transfers.

6. How long we keep your personal information for?

Your personal data will only be stored for a necessary and strict period of time of maximum 1 year in accordance with the purpose for which it is collected and applicable laws or regulatory requirements, unless you consent to Super retaining your personal data for a longer period for future opportunities. Generally, this means we will keep your personal data until the end of the interaction with you, after the recruitment process is finalised, plus a reasonable period of time after that where necessary to deal with legal, tax, accounting or administrative matters and to respond to any inquiries, complaints or legal claims.

Upon expiration of the applicable deadlines and only based on your consent, we can extend the processing and storage of your personal data for another 1 year for the purpose of sharing future opportunities within Super with you. After that, the personal data will be securely deleted or anonymised. If, at any time, you wish us to discontinue the use of your personal data and stop providing you with our services, please contact us in the manner described in Section 9 – Your rights.

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7. How we keep your personal data secure?

Super has implemented all necessary state of the art and industry standard technical and organizational measures, whether physical, electronic or procedural, to protect the confidentiality and security of the personal data you share with us. These measures have been implemented to protect data against unauthorized access, destruction, loss, alteration, access, disclosure or use. Our security controls are designed to maintain an adequate level of confidentiality, integrity and data availability. Information transmitted and received through the Super site and in our applications is encrypted using Secure Socket Layer (SSL) technology. Super has a 24/7 network traffic monitoring system to detect signs of attacks or intrusions.

Despite the security measures mentioned above, we want you to know that IT and the internet are not perfectly secure mediums and there will always be the chance that your personal data could potentially be subject to unauthorized acts by third parties. Although we take reasonable steps and employ appropriate security measures to safeguard your personal data, no method of transmitting or storing data is completely secure.

8. Use of AI, automated tools and profiling

We use certain artificial intelligence (“AI”) and other automated tools to support our recruitment activities (collectively referred to as “AI tools”). These tools are used to support and document the recruitment process, to improve consistency and efficiency, and to enhance the candidate experience; they do not replace human decision-making on whether to hire a particular candidate.

The personal data processed by these tools may include identification and contact details (such as your name, email address and, where relevant, candidate ID), information contained in your application (such as your CV, cover letter and role-related experience), audio and/or video recordings of interviews or calls, interview transcripts and notes, interviewers’ and recruiters’ feedback, and scheduling information (such as your and our interviewers’ availability, time zones and calendar information). This data is obtained directly from you (e.g. through your application and interviews) and from our personnel (e.g. interviewers’ notes and HR systems).

Unless we tell you otherwise, references to “AI tools” cover:

- AI notetakers that record, transcribe and summarise interviews/meetings;
- Generative AI;
- AI assistants (such as interview scheduling).

The AI tools we use typically rely on large language models for text analysis and generation (for example to draft job descriptions, questions and summaries), speech-to-text models for interview transcription, and rule-based or optimisation algorithms (which may incorporate machine learning) for scheduling. These systems operate by identifying patterns in input data (such as job requirements or content of interview discussions) and generating suggested text or proposed time slots that align with those patterns and the constraints provided. We do not configure these tools to take decisions, profile or provide a score that would automatically accept or reject candidates, and we do not rely on them to make final decisions regarding your application.

In practice, the AI tools we use are “assistive” in nature. For example, they may provide draft wording for job descriptions or interview questions, propose a structured summary of an interview, or suggest suitable interview times and send reminders. Human users (recruiters, hiring managers and interviewers) retain full discretion to accept, adapt or reject these suggestions, to correct inaccuracies, and to weigh the information produced by AI tools against their own assessment and the broader context of your application. Where applicable law grants you the right to obtain human intervention, to express your point of view, or to contest a decision that has been influenced by automated processing, you may exercise those rights as described in [Section 9](#) of this Privacy Notice.

Our use of AI tools in recruitment is not intended to constitute “profiling” within the meaning of Article 4(4) GDPR for the purpose of making automated decisions about you. While the tools may help to structure and summarise information about your experience and performance (for example, by highlighting that certain skills were discussed during an interview), they are not used to generate autonomous evaluations, predictions or risk scores that are applied without human review. We do not carry out any decision-making that is solely based on automated processing, including profiling, which produces legal

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effects concerning you or similarly significantly affects you. Hiring and non-hiring decisions, as well as decisions on progressing you to further stages of the process, are always taken by human decision-makers (such as recruiters and hiring managers), who remain responsible and accountable for such decisions.

We recognise that the use of AI may have implications for you, including the risk of transcription errors, misinterpretation or the introduction of bias in generated text. To mitigate these risks and to promote fairness, non-discrimination and reliability, we provide internal policies and guidance on appropriate use of AI tools, including instructions not to use them to consider or infer protected characteristics (such as health, religion, ethnicity, sexual orientation or political opinions), and to review outputs for inclusiveness and relevance to the role. We also implement technical and organisational measures aimed at ensuring accuracy, robustness and security, including access controls, encryption and contractual safeguards with service providers, as well as incident response and monitoring processes. Personal data processed through AI tools is subject to the same retention, access and security standards as other recruitment data described in this notice.

For more information on what data we process about you through our AI tools, please read Section 2 of this Privacy Notice.

9. Your rights

At any given time, you will have the following rights regarding your personal data processed by us. Please note your rights are not absolute in case of other applicable laws and we might refuse to act upon them. We will notify you accordingly as the case may be.

- (A) **The right to information:** you have the right to be provided with information on the identity of the personal data controller, on the reasons for processing your personal data and other relevant information necessary to ensure the correct and transparent processing of your personal data.
- (B) **The right of access:** you have the right to make a request for details of your personal data and a copy of that personal data.
- (C) **The right of rectification:** you have the right to have inaccurate data about you corrected or removed without undue delay.
- (D) **The right of erasure ("right to be forgotten"):** you have the right to have certain personal data about you deleted from our records. If your requests to delete your personal data violate our legal or regulatory obligations, or the data related to the request for deletion are necessary to exercise or defense our legal claims, we may not be able to act upon your request and we will notify you of this decision.
- (E) **The right to restriction of processing:** you have the right to ask us to restrict the use of your personal data.
- (F) **The right to data portability:** you have the right to ask us to transfer the personal data you have given us to you or to someone else in a format that can be read by computer.
- (G) **The right to object:** you have the right to object to us processing (including profiling) your personal data in cases where our processing is based on a task carried out in the public interest or where we have let you know it is necessary to process your data for our or a third party's legitimate interests. We do not process your personal data for direct marketing and profiling purposes in relation to direct marketing.
- (H) **The right in relation to automated decisions:** you have the right to not be subject of a decision which produces legal effects which concern you or which has a significant effect on you based only on automated processing, unless this is necessary for entering into a contract with you, it is authorised by law or you have given your permission for this.

In order to exercise any of the above rights, you can send out an email to talent.data@superbet.com. Requests will be reviewed and answered between 15 to 30 days from receipt, in accordance with the applicable local data protection laws. If we receive a large number of requests, or particularly complex requests, the deadline can be extended by a maximum of another two months. In certain circumstances as prescribed by data protection law (i.e. excessive requests), we might refuse to act upon your request.

As a rule, you can exercise your rights for free. However, we reserve the right to charge a reasonable fee if your requests are manifestly unfounded or excessive, in particular because of their repetitive nature.

We pay the utmost attention to the confidentiality of all personal data and reserve the right to verify your identity if you submit a request for personal data to avoid a potentially undesirable situation for another person to illegally exercise a right on your behalf.

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In the event your personal data is processed based on your consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing carried out on the basis of the consent before its withdrawal.

You also have the right to lodge a complaint with your local National Authority for the Supervision of Personal Data Processing or any competent court to defend the rights guaranteed by the applicable legislation.

10. How to contact us

If you have any questions, comments, complaints or suggestions relating to this notice, or any other concerns about the way in which we process information about you, please contact our Data Protection Officer at gdpr@superbet.com