



Sheladia Associates, Inc.

Application/Candidate Privacy Policy

Introduction:

Sheladia Associates, Inc. (Sheladia or Company) is committed to the responsible use, management and protection of personal information. This Application/Candidate Privacy Policy (Policy) describes our practices in connection with all the information we collect through our Careers Website and other on- and offline sources related to your application for employment or internship with Sheladia.

Information We Collect

We collect your personal information in a variety of ways including, but not limited to: i) what you provide on your application for employment or internship; and, ii) information from other sources related to the process of reviewing and processing your application for employment or internship.

Information You Provide

Your personal information is collected via your application for employment or internship. Information we collect includes, but may not be limited to:

- Name, address, telephone number, email address, and other contact information;
- Username and password;
- Work authorization status;
- CV, résumé, cover letter, previous work experience, and education information;
- Skills;
- Professional and other work-related licenses, permits and certifications held;
- Information relating to references;
- Background check information; and
- Any additional information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards, or professional memberships).

Information you provide is voluntary, however, if you do not provide sufficient information Sheladia may not be able to properly evaluate and consider your application for employment or internship, and/or may impact future decisions related to your employment or internship.

Information from Other Sources

When reviewing and processing your application for employment or internship, we may collect personal information from sources other than yourself, as permitted by applicable law. This collection of data is used for the purpose of background checks in connection with your application, and to determine your suitability for employment or internship with Sheladia. These other sources may include, but may not be limited to:

- Your references;
- Prior employers;

- Educational institutions you attended;
- Background checks

Sensitive Information

As an Equal Opportunity and Affirmative Action Employer, Sheladia may ask certain questions about race/ethnic origin, gender, veteran status, and disability to collect data for the purpose of monitoring equal opportunity. Any sensitive information being requested for this purpose will be voluntarily provided by you. Sensitive information includes race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings. We ask that you avoid providing information that may qualify as sensitive information under applicable law, except where such information is legally required, or to voluntarily respond to those specific questions related to equal opportunity/affirmative action.

Validity of Information

Any information you provide to Sheladia must be true, complete, and not misleading. Providing inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action, including immediate termination of employment. In addition, it is your responsibility to ensure that the information you submit does not violate any third party's rights.

If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

Accessing Your Information

You may request access to your information if not readily accessible by contacting us at hr@sheladia.com. You may also request to correct, update, suppress, restrict or delete personal information, or to receive an electronic copy of your personal information. We will respond to your request within applicable law. Sheladia may need to verify your identity before implementing your request. Certain information may be exempt from the aforementioned requests pursuant to applicable data protection laws and/or other laws and regulations.

Use of Personal Information

Your personal information is collected and processed for one or more of the following reasons:

- You voluntarily provided this information and consent for us to process it;
- This information is necessary to take steps prior to entering into employment or internship with Sheladia;
- The provision and processing of this information is necessary to comply with a legal obligation; or
- As necessary to protect the vital interests of any person.

Sheladia recruitment, human resources and/or other management personnel with a need to know may use your personal information in order to: i) process your application for employment or internship; ii) assess your capabilities and qualifications for a job or internship; iii) to conduct reference checks; iv) to respond to your inquiries and communicate with you about your application, and to send you information regarding and changes to our terms and policies; v) to comply with or monitor compliance with any applicable law or regulation; vi) conduct background checks if we offer you a position; and for other legitimate interests, for example, administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business.

If you become an employee or intern of Sheladia's, your personal information collected with your application may be incorporated into our human resources system and become part of your personnel file, and may be used for other employment-related purposes.

Data Retention

Sheladia will retain your information in our candidate database and may be used to consider you for other opportunities with Sheladia, in accordance with applicable laws. If you do not wish for us to do this, you may contact us at any time and request we remove your information. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law. Retention periods are based upon the duration of the application/hiring process, Sheladia's ongoing relationship with you, applicable requirements from a legal obligation to which we are subject, and in compliance with other records management policies as applicable.

Sheladia may remove personal information from our candidate database, subject to applicable legal or regulatory obligations. Sheladia holds the right to delete your personal information from our database at any time and without provision of any reason. We suggest you retain your own copy of the personal information provided to us.

Consent

The collection and processing of your information is based on your consent. You may withdraw your consent at any time to the extent permitted by applicable law. You may be periodically asked to renew your consent to the collection and/or retention of your personal information.

Cookies and Similar Technology

Sheladia's website and our service providers may use "cookies" and similar technologies on our career site. These technologies process end device information and personal data, and are used for purposes such as content integration, statistical analysis, personalized advertising and the integration of social media. Consent to cookies is voluntary and is not required for the use of our career site. Consent may be revoked at any time.

Other Uses and Disclosures of Information

Sheladia may use and disclose your personal information as necessary or appropriate when we have a legal obligation, or a legitimate interest to do so. These reasons may include:

- To comply with applicable law.



- To respond to requests from public and government authorities.
- To cooperate with law enforcement.
- For other legal reasons.
- In connection with a sale or business transaction.

Sheladia will share your personal information to those involved in evaluating candidates for a given position. Sharing is always limited to those with a need to know for purposes described in this Policy. We may share your information with our third-party service providers to facilitate services they provide to us, such as hosting and operating our career site, recruiting assistance, and/or background check processing.

Security and Transferability

Sheladia seeks to use reasonable organizational, technical, and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us.

Sheladia hereby disclaims, as far as permitted by local laws, any liability for itself for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to our career site.

This Policy does not transfer to third-party websites. Sheladia shall not be held responsible for the privacy, information or other practices of any third parties. The inclusion of a link on the career site does not imply endorsement of the linked site or service by Sheladia.

Law Applicable to Employment/Internship Application

Any hiring or other employment-related decisions will be made in accordance with the laws of the country where the job will be located.

Changes to the Policy

Sheladia reserves the right to amend this Policy at any time in order to address changes in the company, industry and/or legal trends. The Policy will always include a “last updated” date to indicate when the Policy was last revised. Changes to the Policy become effective when posted.

Contact Us

If you have any questions or requests, please feel free to contact us at: hr@sheladia.com or +1 301-590-3939. Please do not include sensitive information in your emails to us.