

CANDIDATE PRIVACY POLICY

The mobility service brands operating in the Baltic States under “Modus Mobility”, including “CityBee,” “MyBee,” “CityBee Solutions,” and others (hereinafter – “**WE**,” “**Modus Mobility**”), respect the privacy of the personal data you provide and/or that we receive and are committed to protecting it in accordance with the provisions of this Candidate Privacy Policy (hereinafter – the “**Candidate Policy**”).

When processing your personal data, we comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (the General Data Protection Regulation, hereinafter – the “**GDPR**”), as well as with other laws protecting your personal information that may be used to identify you.

In this Candidate Policy, you will find information about the processing of your personal data. We are committed to transparency by providing you with clear information about which of your personal data are processed, the purposes of processing, the retention period of personal data, as well as the legal basis for data processing and other information that we are required to provide under applicable legislation.

Modus Mobility consists of the following companies:

- Prime Leasing UAB, 302565318, Žalgirio g. 112-1, Vilnius, Lithuania;
- CityBee Eesti OÜ, 14646800, Narva mnt. 31, Tallinn, Harju maakond 10120, Estonia;
- CityBee Latvia SIA, 50203191721, Piestātnes iela 11A, Jūrmala, LV-2015, Latvia;
- MyBee Fleet UAB, 302791089, Žalgirio g. 112-1, 09300 Vilnius, Lithuania;
- MyBee Estonia OÜ, 16462004, Narva mnt. 31, Tallinn, Harju maakond 10120, Estonia;
- MyBee Latvia SIA, 40203431136, Zemitāna iela 9, B korpuss, Rīga, LV-1012, Latvia;
- CityBee Solutions UAB, 302735731, Žalgirio g. 112-1, Vilnius, Lithuania;
- Modus Mobility UAB, 302784358, Žalgirio g. 112-1, Vilnius, Lithuania;
- Mobility Fleet Solutions UAB, 302735731, Žalgirio g. 112-1, Vilnius, Lithuania.

1. For what purposes do we process your data?

We process your personal data for the purpose of administering the selection process for your candidacy as a potential candidate for a position in our company. This includes, among other things, reviewing your application, creating a candidate profile, contacting you through appropriate means (e.g., to invite you to a job interview), storing your curriculum vitae (CV), or sharing it with our other affiliated companies (only with your consent).

2. What personal data do we process about you?

We collect, process, and store the following personal data related to your application for participation in the employee selection process:

Name, surname, contact information (email address and telephone number), curriculum vitae (CV), employment history (experience), education history (including copies of diplomas, training courses,

and other certificates), language skills, other skills and personal qualities. We may also process salary expectations, results of tests and/or practical tasks, application attachments such as photographs and video recordings (optional), URL links to social media accounts (optional), and a photograph (optional). Other application-related data may also be processed (e.g., number of applications, job interview date, notes, messages), correspondence data (e.g., email content), preferred job position and/or working hours, and notes recorded by us during the job interview process depending on the position for which you are applying.

Submitting your candidacy for the positions offered by us or sending your curriculum vitae (CV) is voluntary; therefore, you may choose which personal data you wish to provide and to what extent. In some cases, depending on the position, we may request additional information from you, for example, information about your driver's license, whether you are willing to work in shifts, etc.

Please note that you are not legally required to provide us with your personal data. However, if you choose not to provide your personal data or do not provide all the required personal data, we will not be able to assess your candidacy and you will not be able to participate further in the recruitment process.

3. On what legal bases do we collect and process your personal data?

We most often process your personal data on the basis of your consent (GDPR Article 6(1)(a)) when you voluntarily provide your personal data to us for the purpose of evaluating the suitability of your candidacy and including you in the recruitment process.

You may withdraw your consent to participate in the selection process at any time through the recruitment platform used by us or by informing us separately in writing using the contact details provided below.

We may also process your personal data on the following legal bases:

- Intention to enter into an employment contract with you (GDPR Article 6(1)(b)) – when you are selected as a suitable candidate for a position and it is necessary to carry out the employment process;
- Our legitimate interest to assess your suitability for the desired position and to avoid any conflicts of interest (GDPR Article 6(1)(f));
- Our legitimate interest to contact you and offer a job opportunity (GDPR Article 6(1)(f)) – when you publish your contact information on the LinkedIn platform.

4. How do we collect information about you?

We may obtain personal data of candidates from various sources:

- Directly from you, when you provide us with your curriculum vitae and/or other information as part of your application, for example when you apply for specific advertised vacancies or when you send us your curriculum vitae (CV) by email without a specific recruitment process being conducted;
- From a recruitment agency (if you submitted your application through such an agency);
- From our existing employee who has recommended a candidate. In such a case, we contact the candidate in relation to the recruitment process;
- From publicly available third-party sources, such as LinkedIn, CVonline, CVbankas, or other business and employment related websites where you publicly publish information about yourself. We may also obtain information from publications that you have written or contributed to and that are publicly available, or where you have provided a URL link to your LinkedIn profile, etc.;

- From the Employment Service under the Ministry of Social Security and Labour of the Republic of Lithuania.

5. How long do we retain your personal data?

When you apply for a position in our company in response to our public job advertisement, your personal data will be retained for the duration of the recruitment process and for **3 (three) months** after the date the public job advertisement is removed/deleted.

When you apply not through our company's public job advertisement but by sending us your curriculum vitae by email or through social networks, your personal data will be stored in our system for **6 (six) months** from the date we receive your information.

In cases where you have given us your consent for the purpose of offering you potential job opportunities in the future, we may retain your personal data for an additional **18 (eighteen) months** from the date the consent was obtained.

In cases where we receive information about you indirectly, for example from a person who recommended you, and you do not provide your consent within **30 days**, your personal data will be deleted after the expiry of this period.

Please note that if you change your mind and no longer wish us to process and store your personal data in accordance with the retention periods specified above, you may withdraw your consent at any time through the recruitment platform used by us or by informing us separately in writing using the contact details provided below.

6. To whom may we disclose your personal data?

We disclose your personal data to our data processors, i.e., entities that provide us with IT maintenance, recruitment, and other related services.

As we use the "Workable" recruitment platform to facilitate the recruitment process, the company providing this platform and its subcontractors may have access to candidates' personal data while delivering their services. Workable acts as our data processor.

We may also transfer your personal data to relevant public authorities that have the right to verify compliance with applicable requirements. Such transfers are carried out only upon their request and/or when necessary to defend the legitimate interests of the company before public authorities or courts.

With your separate consent, we may also transfer your personal data to other companies within the Modus group for which your candidacy may be relevant. Personal data transferred with your consent will be processed and stored in accordance with the candidate and/or privacy policies of the respective Modus group company.

7. Data security

We process your personal data responsibly and securely, in accordance with approved internal data protection policies and by implementing appropriate technical and organizational security measures, including, but not limited to, protection against unauthorized and unlawful disclosure, loss, destruction, alteration, or other unlawful processing of data. When processing personal data, we follow the fundamental principles of data processing:

- We process personal data for clearly defined and lawful purposes;

- We ensure transparency in the processing of personal data;
- We process only the amount of personal data that is necessary to achieve our legitimate purposes;
- We grant access to personal data only to those employees for whom such information is necessary to perform their duties and who are committed to ensuring data confidentiality;
- We disclose personal data to third parties only where there is a sufficient legal basis (e.g., a European Commission adequacy decision under GDPR Article 45 and/or Standard Contractual Clauses under GDPR Article 46(2)(c));
- We have established procedures intended to manage potential personal data protection breaches.

Data processed on the Workable platform may be transferred for processing and/or storage outside the European Economic Area (EEA). Such data may be processed by our service providers that provide Workable system maintenance or cloud hosting services in the United States.

As the United States does not ensure the same level of personal data protection as the European Union, Workable Software Limited and its foreign affiliated companies have entered into data processing agreements (Standard Contractual Clauses) with each other. These agreements are intended to ensure additional safeguards that protect the confidentiality and security of the personal data being transferred.

8. What rights do you have?

The GDPR and other applicable laws grant you certain rights, along with procedures and exceptions for exercising these rights. Where permitted by law, you may:

- Request information on whether we process your personal data, and if such personal data is being processed, the right to access your personal data;
- Request correction of inaccurate personal data or supplement incomplete personal data;
- Request deletion of your personal data if you believe there is no reason for us to continue retaining it or if we are processing it unlawfully;
- Request the personal data you have provided to us in a structured, commonly used, and machine-readable format and also request that it be transferred to another third party;
- Object to or request restriction of processing under certain circumstances, such as if you dispute the accuracy of the data, or when the processing is unlawful and you do not consent to deletion but instead request restriction, or if you need the data to assert, exercise, or defend legal claims;
- Object to the collection, use, or storage of your personal data when we process personal data based on our and/or third parties' legitimate interests;
- Withdraw any consent you have given us regarding the processing of your personal data, in cases where we process your personal data based on your consent;
- Lodge a complaint with a supervisory authority or bring a case before a court.

To exercise these rights, please contact us in writing or get in touch with our Data Protection Officer using the contact details provided below.

If you believe that the way we process your personal data does not comply with applicable laws, you have the right to contact the State Data Protection Inspectorate (www.vdai.lrv.it).

9. How to contact us?

If you have any questions regarding the processing of personal data, or if you have any requests or comments, please contact us at:

UAB Modus Mobility, 302784358, Žalgirio g. 112-1, Vilnius, Lithuania.
Data Protection Officer: dpo@modusmobility.group

10. How often do we update the Candidate Policy?

We regularly review our Candidate Policy and update it in accordance with changes in applicable legislation and/or our internal processes. This version was last updated on 8 April, 2026.
