CANDIDATE PRIVACY POLICY

Effective Date: *August 2026*

1. SCOPE

This Policy explains how Productive Playhouse, Inc. ("PPH," "we," "us") collects, uses, shares, and protects personal information about individuals (“Candidates”) who apply for or are considered for a role, project, or engagement with PPH, whether as an Employee, Independent Contractor, or Participant. This Policy applies to PPH's global operations and covers the application, screening, and assessment stages, up through an offer or engagement decision. If you apply for a role with a PPH affiliate or subsidiary (for example, in Thailand, Australia, etc.) that affiliate is also responsible for your personal information under this Policy.

It does not cover how PPH handles personal information about individuals who have already been engaged as Employees, Independent Contractors, or Participants, that is addressed in separate workforce or contractor privacy documentation provided at onboarding.

2. INFORMATION WE COLLECT

CATEGORY	EXAMPLES
Identifiers & contact information	Name, email address, phone number, mailing address
Application information	Resume/CV, cover letter, work history, references, portfolio links
Assessment data	Responses to skills or language tests, comprehension scores, and short voice recordings submitted as part of an assessment
Communications	Emails, messages, or notes exchanged with PPH during recruiting
Technical data	Timestamps, submission metadata, IP address, and device/browser information collected by our assessment platform
Voluntary self-identification *(U.S. only)*	Gender, race/ethnicity, veteran status, and disability status, provided only if you choose to. This information is stored separately from your application and is not used in hiring or engagement decisions.

Engagement information *(if selected)*	Applicable worker classification, project or role terms, and information needed to begin onboarding

Sources. We collect this information directly from you, from references you provide, from job boards and professional networking sites, and from recruiting service providers acting on our behalf.

Except for short voice recordings collected during role-specific language or audio assessments (which may qualify as Sensitive Personal Information or Biometric Data under applicable laws like GDPR Article 9 and CCPA/CPRA), and voluntary self-identification information collected from U.S. applicants for equal employment opportunity purpose, we do not intentionally collect sensitive categories of personal information (such as health data, government IDs, or financial accounts) at the initial application stage. Where voice assessments are required, we obtain your explicit opt-in consent prior to collection. You may withdraw that consent at any time, although doing so may prevent us from completing your assessment.

3. HOW WE USE YOUR INFORMATION

We process your personal information for the following business and legal purposes:

- To evaluate your qualifications, skills, and fit for the role or project you applied to.
- To administer assessments and score results against job-related criteria.
- To communicate with you about your application and next steps.
- To maintain records required for equal employment opportunity compliance and, where applicable, to evaluate our selection processes for adverse impact.
- To detect fraud, verify identity and physical location (via IP/VPN monitoring), uphold location-gating mandates under our *Sanctions and Restricted Regions Policy*, and enforce assessment integrity rules (for example, one-submission-per-candidate limits).
- To prepare an offer or engagement agreement if you are selected.

3.1 Lawful Bases under Global Privacy Laws (GDPR, UK GDPR, & PDPA)

Where applicable under global data protection regulations (such as in the EU, UK, EEA, and Thailand), our legal bases for processing your personal data include:

1. **Pre-Contractual Necessity:** Processing necessary to take steps at your request prior to entering into an employment or contractor agreement (e.g., GDPR Art. 6(1)(b), PDPA Sec. 24(3)).
2. **Legitimate Interests:** Processing necessary for our legitimate operational interests in evaluating candidate suitability, protecting platform integrity, and preventing recruiting fraud (e.g., GDPR Art. 6(1)(f), PDPA Sec. 24(5)).

3. **Legal Obligations:** Processing necessary to comply with legal and tax obligations that apply to us in your jurisdiction, such as equal opportunity reporting for U.S. applicants (e.g., GDPR Art. 6(1)(c), PDPA Sec. 24(6)).
4. **Consent:** Explicit consent, where required for collecting biometric voice recordings (e.g., GDPR Art. 6(1)(a) & Art. 9(2)(a), PDPA Sec. 19 & Sec. 26).
5.

4. WHO WE SHARE IT WITH

- Service providers who support recruiting and assessment on our behalf — for example, our assessment platform vendor — under contract terms that restrict them from using your information for their own purposes.
- PPH personnel involved in the hiring or engagement decision, on a need-to-know basis.
- PPH affiliates and subsidiaries, where you are considered for a role or engagement involving that entity.
- Employer-of-record -
- External legal counsel or auditors, where needed to evaluate compliance or respond to a legal obligation.
- Regulators or government authorities, where required by law.
- A successor entity, in connection with a merger, acquisition, reorganization, or sale of assets

We do not sell your personal information, and we do not share it for cross-context behavioral advertising. Because we do not sell or share personal information, there is nothing to opt out of; however, we honor Global Privacy Control (GPC) and similar opt-out preference signals as a request to opt out of any such sale or sharing.

5. INTERNATIONAL DATA TRANSFERS

PPH operates globally, so your information may be processed in a country other than the one where you applied, including the United States, where our primary recruiting infrastructure and secure cloud repositories are hosted.

If you applied from the European Union, United Kingdom, or European Economic Area, transfers of your personal data to the U.S. or other third countries are safeguarded using EU Standard Contractual Clauses (SCCs), and the UK International Data Transfer Addendum.

If you applied from Thailand, we transfer your data internationally only where a recognized adequacy finding applies, under contractual safeguards with the receiving party, or with your explicit consent, consistent with Thailand's Personal Data Protection Act.

If you applied from Australia, we take reasonable steps to ensure any overseas recipient of your data handles it consistently with the Australian Privacy Principles before we disclose it.

If none of these applies to you, your information may still be transferred internationally as described above, consistent with the law of the country where you applied.

6. RETENTION INFORMATION

Outcome	Retention
You are not selected	Retained for 12 months, or longer where required by applicable law (for example, 4 years for applicants in California), to support recordkeeping and legal compliance, then deleted or anonymized
You are selected and engaged	Application and assessment records are retained as part of your personnel or engagement file, per PPH's standard retention schedule
You withdraw your application	Retained for 12 months unless you request earlier deletion, subject to Section 7 and any legal retention requirement
Voice Recordings	Deleted within 60 days after the assessment decision, unless you are engaged, in which cause they follow the engaged-candidate schedule above.

7. YOUR RIGHTS

Depending on where you are located, you may have the following rights over your personal information. To exercise any of them, contact us using the details in Section 10; we will verify your identity before responding.

Jurisdiction	Your rights	How we respond
California (CCPA/CPRA)	Know what we collect, delete, correct inaccuracies, limit use of sensitive personal information, opt out of automated decision-making, non-discrimination for exercising these rights, and to make a request through an authorized agent.	Within 45 days, extendable once by 45 days with notice to you

EU / UK / EEA (GDPR)	Access (Art. 15), Rectification (Art. 16), Erasure/Right to be Forgotten (Art. 17), Restriction of processing (Art. 18), Data Portability (Art. 20), Right to Object (Art. 21), withdraw consent at any time where consent is our basis for processing, and the right to lodge a complaint with a Data Protection Supervisory Authority.	Without undue delay and within one month, extendable by two months for complex requests with notice to you
Thailand (PDPA)	Access and obtain a copy of your data, request rectification or erasure, object to or restrict processing, receive your data in a portable format, and withdraw consent where consent is our basis for processing, and lodge a complaint with the Personal Data Protection Committee.	Without undue delay; PPH targets 30 days as internal practice
Australia (Privacy Act)	Access your personal information and request correction of inaccurate information, and complain to the Office of the Australian Information Commissioner (OAIC).	Within a reasonable period; PPH targets 30 days as internal practice
All other locations	You may still contact us with any request regarding your information, and we will respond consistent with applicable local law	PPH targets 30 days as internal practice

8. AUTOMATED ASSESSMENT SCORING

Some assessments generate a score or recommendation used as one input into our evaluation of your candidacy. These scores support, but do not replace, review by PPH recruiting personnel before any decision is made about your application. If you would like your assessment reviewed without reliance on an automated score, contact us using the details in Section 10.

9. DATA SECURITY

We require our assessment and recruiting service providers to maintain administrative, technical, and physical safeguards appropriate to the sensitivity of the information involved, and we restrict internal access to application and assessment data to personnel who need it to do their jobs.

10. CONTACT US

Questions about this Policy, or requests to exercise your privacy rights, can be directed to:

- **Email:** privacy@productiveplayhouse.com
- **Mailing Address**

Productive Playhouse, Inc.
ATTN: Privacy Requests / HR Governance
100 N. Brand Blvd. Suite 614
Glendale, CA 91203

11. CHANGES TO THIS POLICY

We may update this Policy from time to time to reflect regulatory updates or operational shifts. The “Effective date” above reflects the most recent revision. Material changes will be reflected here before they take effect.