



Candidate Privacy Notice

EFFECTIVE DATE: JULY 15, 2024

Imagine Learning LLC (“Imagine”, “our”, “we”, “us”) takes your privacy seriously and wants to ensure transparency regarding how we handle your data. This privacy notice explains how we collect, use, process, and store your data during our recruitment process.

1. Purpose of Data Processing

We process your data solely for recruitment purposes and to carry out our legal responsibilities. This includes assessing your qualifications, conducting interviews, and evaluating your fitness for the position. We will also carry out verification checks in relation to your right to work in the U.S.

2. Types of Data Collected

The data we collect may include:

- Name
- Contact information, including your address, email address, phone numbers
- LinkedIn information
- Gender, ethnicity, and other EEO characteristics
- Disability information
- Resume/CV, including cover letter, references, education history, and employment history
- Interview notes
- Documentation relating to your right to work in the U.S.
- Driver’s license or passport

3. How We Collect Data

You directly provide us with most of the data we collect. We collect data and process data when you:

- Complete an online application for a job with us
- Submit documentation to us in support of your qualifications
- Participate in a job interview
- Complete a job assessment

In some cases, we will collect data about you from third parties, such as employment agencies, former employers (when gathering references), or credit reference agencies.

Personal data is kept in personnel files or within Imagine Learning’s HR and IT systems. We have implemented appropriate technical and organizational measures to protect the data.

4. Third Parties

We may share your information internally with our subsidiaries or affiliates under the control of our affiliates or subsidiaries under the control of corporate parent and our service providers (e.g., applicant tracking system) that help us with the recruitment process.

5. Data Retention

We retain your data for as long as necessary to complete the recruitment process or for our legitimate business interests.

If your application is successful, your data will be kept and transferred to your employment file with us and retained in compliance with our employee privacy notice.



6. Automated Decision-Making

No decision will be made about you solely based on automated decision-making (where a decision is taken about you using an electronic system without human involvement) which significantly impacts you.

7. Your Rights

Some U.S. state privacy laws, such as the California Consumer Privacy Act (as amended by the California Privacy Rights Act) (“CCPA”) provide certain rights to state residents, such as the right to access, rectify, and erase your personal data with us. We will not discriminate against you for exercising your rights under the CCPA or other state law. We do not sell your personal data as defined under the CCPA. To exercise your rights or for any inquiries, please contact our Privacy office at privacy@imaginelearning.com.

8. Making a Complaint

If you think your data protection rights have been breached in any way by us, you are able to make a complaint to us at privacy@imaginelearning.com.

9. Changes to This Notice

We may change this Notice from time to time.