

Last Updated: February 10, 2026

**Introduction**

ADAPTOVATE is committed to protecting the privacy of your personal information during the recruitment process. This Data Privacy Notice explains how your personal information will be collected, used, and stored in accordance with applicable laws in the regions we operate: Australia, Singapore, United States, Canada, the Philippines, Poland, and the United Kingdom.

**Who Collects Your Data**

ADAPTOVATE, through its local office in the region where you apply, acts as the data controller for your personal information in compliance with applicable regional laws during the application process. For questions or concerns, please contact: [careers@adaptovate.com](mailto:careers@adaptovate.com). If you are in the EU/UK, you may also contact our local representative through the same email, and further details can be provided upon request.

**What Personal Data Do We Collect**

We collect and process the following types of personal data during the recruitment process:

Data You Provide Directly

- Identity Details, such as your Name, contact information, address.
- Professional Details, such as your CV/resume, academic qualifications, employment history, references.
- Application Information such as your Cover letters, interview notes, and responses to assessments.
- Sensitive Information, when required and permitted by law (e.g., diversity data, disability information for reasonable adjustments).

Data Collected from Third Parties

- Recruitment Platforms, such as LinkedIn, Glassdoor, Indeed.
- Background Screening Providers for roles requiring checks, with prior notice.
- Referrals, including information provided by references you supply.

Automatically Collected Data

- System logs and metadata during online applications (e.g., IP address, browser type).

**How We Use Your Information**

We process personal data for the following purposes and on the following legal bases under applicable data protection laws:

Purpose/ Activity	Description	Legal Basis for Processing
Recruitment and hiring management	<ul style="list-style-type: none"> <li>• Reviewing applications and conducting interviews</li> <li>• Recruitment-related events and activities</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests (in assessing the suitability of our candidates and managing our recruitment process)</li> <li>• Consent (where legally required)</li> </ul>
Sourcing Candidates	<ul style="list-style-type: none"> <li>• Assessing suitability for future opportunities and maintaining a talent pool</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests (in assessing the suitability of our candidates and</li> </ul>

		managing our recruitment process) <ul style="list-style-type: none"> <li>• Consent (where legally required)</li> </ul>
Maintaining recruitment and employment records	<ul style="list-style-type: none"> <li>• Creating and managing records related to potential or actual employment or contractor relationships</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract (where applicable)</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Consent (where legally required)</li> </ul>
Compliance with legal and regulatory obligations	<ul style="list-style-type: none"> <li>• Complying with applicable laws, regulations, court orders, audits, and responding to requests under data protection laws</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>

Where processing is based on legitimate interests, we have assessed that those interests are not overridden by your rights and freedoms.

Where processing is based on consent, you may withdraw your consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

**Data Sharing**

We do not sell, rent, or trade your data. However, your data may be shared with:

- Third-party recruitment platforms/software.
- Service providers (e.g., for background checks).
- Legal authorities, if required by law.
- Internal ADAPTOVATE offices in other jurisdictions for recruitment purposes.

Where personal data is transferred internationally, we implement appropriate safeguards such as standard contractual clauses, equivalent contractual protections, or other lawful transfer mechanisms as required by applicable law.

## Data Privacy Notice for Job Applicants

### Data Retention

ADAPTOVATE retains candidate personal data only for as long as necessary to support recruitment activities and to meet applicable legal, compliance, audit, and record-keeping obligations.

### Talent Pool Lifecycle

If you consent to join our talent pool, we will retain and actively use your personal data to contact you about future job opportunities for up to 24 months from the date of consent. If your consent expires or is withdrawn and no renewed consent is provided, we will stop all recruitment-related contact. Your personal data will then be retained for a further period of up to 12 months for legal, compliance, audit, and record-keeping purposes only, after which it will be securely deleted or anonymized.

### Withdrawal of consent

You may withdraw your consent at any time. Upon withdrawal, we will immediately cease contacting you about future opportunities. Your personal data may still be retained for a limited period where required by applicable law or for legitimate compliance purposes, in line with our retention policy.

### Anonymization and deletion

At the end of the applicable retention period, personal data is securely deleted or anonymized in accordance with applicable data protection laws, including GDPR requirements. Personal data is reviewed periodically to ensure it is not retained longer than necessary for the purposes described above.

### Your Rights

You have specific rights under applicable privacy laws, which may include:

- Right to withdraw consent at any time, where processing is based on consent
- Right to access your personal data and obtain a copy of it
- Right to rectification of inaccurate or incomplete personal data
- Right to erasure or deletion of your personal data, subject to applicable legal exceptions
- Right to object to the processing of your personal data, where permitted by law
- Right to restriction or limitation of processing in certain circumstances
- Right to data portability, where applicable
- Right to be informed about how your personal data is collected, used, and disclosed
- Right not to be subject to certain automated decision-making or profiling, where applicable
- Right to opt out of certain processing activities, including sale or sharing of personal data, where applicable under local law
- Right to information about data retention periods and safeguarding practices
- Right to lodge a complaint with a relevant data protection or supervisory authority
- Right to seek remedies or compensation, where provided by applicable law

**Note for U.S. Applicants:** Specific rights (e.g., under the California Consumer Privacy Act, CCPA) apply mainly to California residents. Other states may have varying or fewer rights.

### Data Security

We take appropriate technical and organizational measures to protect your data, including encryption, secure access controls, and employee training. We also review our policies regularly to ensure compliance.

### Region-Specific Regulations

Country	Regulation
Australia	Privacy Act 1988, Australian Privacy Principles APPs
Singapore	Personal Data Protection Act 2012 (PDPA)
United States	State-level data privacy laws, including the California Consumer Privacy Act (CCPA) for Californian residents
Canada	Personal Information Protection and Electronic Documents Act (PIPEDA)
Philippines	Data Privacy Act of 2012
Poland	EU General Data Protection Regulation (GDPR)
United Kingdom	UK GDPR, Data Protection Act 2018

**Contact Us**

If you have questions about this Notice or want to exercise your rights:

- Global Email: [careers@adaptovate.com](mailto:careers@adaptovate.com)
- Local Representative: Available upon request for EU/UK candidates

We may update this Notice from time to time. The most current version will always be made available, and material changes will be communicated where required by law.