



JAEGER APPLICANT PRIVACY NOTICE

This Applicant Privacy Notice (“**Privacy Notice**”) describes the collection, use, retention, and sharing of your Personal Data through the course of your tenure with your relevant employer listed in [Exhibit A](#) (collectively “**Jaeger**”, “**we**”, “**us**”, or “**our**”) and its subsidiaries and affiliates. For additional information, please see our global [Privacy Notice](#).

This Privacy Notice explains:

- applicability to Personal Data;
- our role in data processing;
- the Personal Data we collect and why;
- how we share your Personal Data;
- information security and retention of your Personal Data;
- your rights with respect to Personal Data; and
- where to address your questions or complaints.

OUR ROLE IN DATA PROCESSING

The entity responsible for the collection and use (processing) of your Personal Data is Jaeger Medical America Inc. and Jaeger Medical GmbH, which, for the purpose of the European Union’s General Data Protection Regulation (“**GDPR**”) and the United Kingdom’s Data Protection Act 2018 (“**DPA**”), is the data controller. If you have any questions or concerns about Jaeger's use of and collection of your Personal Data, please contact us at privacy@jaegerrdx.com.

PERSONAL DATA WE COLLECT AND WHY

Throughout the application process with Jaeger, we collect Personal Data from you in a variety of ways. Personal Data means any information relating to an identified or identifiable natural person and includes the term “Personal Information” under the California Privacy Rights Act. You are not obliged to provide us with Personal Data. However, if you decline to provide information when requested, and this information is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check for this role and you fail to provide us with relevant details, we will not be able to take your application further.

Through your tenure with Jaeger, Jaeger will collect Personal Data to:

JAEGER APPLICANT PRIVACY NOTICE

- **Complete an application.** When you apply for a position at Jaeger, we collect from you or the recruiting agency through which you applied, your *personal identifiers* (name, email address, telephone number, and physical address), your *professional or employment information* (resume/CV, cover letter, certifications or licenses, qualifications, employment history), and any other information you choose to include with your application. We use this information to review your background and skills, to determine your qualifications for the role you are applying to, communicate with you about your application and candidacy, and to confirm information related to your employment and education. The legal basis for this processing is that it is necessary to perform a contract or to take steps at your request, before entering into a contract. For equal employment purposes, you also have the option (when it is clearly and specifically requested) to provide us with your *protected classifications* (gender, age, veteran status, disabilities) and *sensitive protected classifications* (race, ethnicity). We use this protected classification and sensitive protected classification information for government reporting purposes, to comply with legal requirements, to analyze requested disability accommodations as applicable, and to document any accommodations we have provided to accommodate your needs. The legal basis for this processing is our legitimate interest in the more efficient management of our application process or, where applicable, to comply with our legal obligations or our legitimate interest in compliance with non-EU legal obligations that apply to Jaeger. The processing condition for the processing of this sensitive information is, depending on the laws of the relevant member state, the safeguarding of your rights (Art. 9(2)(b) GDPR) or assessing your work capacity as an employee (Art. 9(2)(h) GDPR). We also use this information, in the aggregate, to conduct internal analytics and bench marking. We share this information with our third party applicant tracking system to organize our applications and assist with assessing your application.
- **Information from references.** When you provide references with your application, we will obtain from your references, your *professional or employment information* (work skills), and will draw *inferences* from your references, such as their thoughts on how your skills might enable you to succeed in the position you have applied for. We use this personal data to assess your suitability for the position for which you have applied. The legal basis for this processing is that it is necessary to perform a contract or to take steps at your request, before entering into a contract.
- **Verify your education.** When you first join Jaeger and throughout your tenure with us, we collect from you as well as from background check providers, and education institutions, your *non-public education information* (verification of education level completed, verification of dates enrolled in educational institutions, certifications obtained, report cards, transcripts). We use this information to verify your education for employment purposes. The legal basis for this processing is our legitimate interest in verifying applicants' qualifications for positions at Jaeger.

JAEGER APPLICANT PRIVACY NOTICE

- **Conduct a background check.** When a background check is requested as part of the candidate review process, we will collect, from you, your *personal identifiers* (name, date of birth, and physical address) and *sensitive identifiers* (Social Security number or other government-issue I.D. numbers). We share this information with a background check provider in order to conduct a background check and Office of Inspector General exclusion check to verify your identity, credentials, and criminal history, and to facilitate the background check. The legal basis for this processing is that it is necessary to perform a contract with you. The processing condition for the processing of this sensitive information is to assess your work capacity as an employee (Art. 9(2)(h) GDPR). For positions where a pre-employment drug test is required, we share your *personal identifiers* (name, date of birth, email address, telephone number, physical address) with a third-party drug screening provider to facilitate and arrange the screening. We will subsequently collect your *health information* (drug test results) from this provider. We use this sensitive information to confirm you adhere to Jaeger's drug policy. The legal basis for this processing is that it is necessary to perform a contract or, if applicable, to comply with our legal obligations. The processing condition for the processing of this sensitive information is to assess your work capacity as an employee (Art. 9(2)(h) GDPR).

Jaeger will also use the personal data we collect as described in this section to comply with the law, to efficiently maintain our business, and for other limited circumstances as described in Sharing of Your Personal Data.

SHARING OF YOUR PERSONAL DATA

A. General Sharing

We share your Personal Data as follows:

- **Within Jaeger.** We share applicant Personal Data among our hiring decision-makers (i.e. human resources department, senior management, and hiring managers) to assess applications and make hiring decisions. Access to applicant personal data is limited to those on a need-to-know basis. The legal basis for this sharing is our legitimate interest in carrying out our business and application process efficiently.
- **For legal purposes.** We may share your Personal Data with third parties, such as legal advisors, law enforcement agencies, or governmental/regulatory bodies in order to protect our legal interests and other rights, protect against fraud or other illegal activities, for risk management purposes, and to comply with our legal obligations. To the extent that E.U. or U.K. law applies, the legal basis for this sharing is compliance with legal



JAEGER APPLICANT PRIVACY NOTICE

obligations and our legitimate interest in compliance with non-E.U. laws applicable to Jaeger.

- **During a corporate reorganization.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any portion of our business, we may share Personal Data. To the extent that E.U. or U.K. law applies, the legal basis for this sharing is our legitimate interest in the efficient operation of our business or, consent, where this is required.
- **With service providers.** We share your personal identifiers, protected classifications, professional or employment related information, internet or other electronic network information, and your customer records information to service providers that help us perform employment-related functions. These service providers include IT support, background check companies, payroll processors, financial services, compensation management providers, employee travel and expense management services, expense processors, health insurance providers, benefits providers and similar providers engaged to assist us in carrying out business activities and HR-related functions. Personal data is transferred to the United States. Therefore, when we transfer Personal Data from the European Economic Area (E.E.A), the U.K. or Switzerland for processing in countries outside the E.E.A, U.K., or Switzerland which are not recognized by the E.U., Switzerland or the U.K. as providing an adequate level of protection to Personal Data, for example, to the United States, we rely on approved data transfer mechanisms, such as Standard Contractual Clauses.
- **With IT support.** We share your personal identifiers and internet or other electronic network information to IT support to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, to identify and repair errors that impair functionality, and to improve, upgrade, or enhance Jaeger devices. To the extent that E.U. or U.K. law applies, the legal basis for this sharing is our legitimate interest in the efficient operation of our business.
- **With your consent.** Apart from the reasons identified above, we may request your permission to share your Personal Data for a specific purpose. We will notify you and request consent before you provide the Personal Data or before the Personal Data you have already provided is shared for such purpose. You may revoke your consent at any time with effect moving forward and may do so by contacting us via email at privacy@jaegerrdx.com.

B. Sharing in the Preceding Twelve (12) Months



JAEGER APPLICANT PRIVACY NOTICE

For Business Purposes. In the preceding twelve (12) months, Jaeger has disclosed the following categories of personal data for a business purpose to the following categories of third parties:

We have disclosed your personal identifiers and internet or other electronic network activity information to IT support to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to identify and repair errors that impair functionality.

- We have disclosed your personal identifiers, sensitive data, and professional or employment information with service providers that assist us in assessing and track your application. These service providers include our drug test provider (if applicable), background check provider, credit reference agencies, and verification of employment authorization providers..

C. Sale/Sharing of Personal Data

Although Jaeger does not sell or share applicant personal information for monetary consideration, we disclose internet and other network activity information via cookies with third party cookie providers to assist with analytics and advertising. This disclosure is a “sale” or “sharing” under the CPRA. To opt out of the sale or sharing of your personal information through cookies, please visit Cookies Settings.

RIGHTS OF CALIFORNIA EMPLOYEES

The California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act (collectively, “CPRA”) entitles California residents to certain rights. If our processing of your Personal Information is subject to the CPRA, you are entitled to the following rights:

- **Right to Access/Know.** You have the right to request what Personal Information we have collected, used, disclosed, and sold about you, unless doing so proves impossible or would involve disproportionate effort. You may only make a request for access twice within a 12-month period.
- **Right to Deletion.** You have the right to request the deletion of your Personal Information that we collect or maintain, subject to certain exceptions. For example, if we are required by law to retain the information that you are asking to be deleted, we would not be able to delete the information until we are legally permitted to delete it.
- **Right to Correct.** You have the right to correct inaccurate Personal Information that we collect or maintain.



JAEGER APPLICANT PRIVACY NOTICE

- **Right to Opt Out of Sale/Sharing.** You have the right to opt-out of the sale or sharing of your Personal Information to third parties. Jaeger does not have actual knowledge that it sells or shares personal information of minors under the age of sixteen (16) years. We only sell or share personal information under CPRA via cookies. Our use of third-party cookies may be deemed a sale or sharing under the CCPA/CPRA. To opt out of the sale or sharing of your personal information through cookies, please visit Do Not Sell or Share My Personal Information.
- **Right to Non-Discrimination.** You have the right to not receive discriminatory treatment if and when you exercise your rights to access, delete, opt out, correct, or limit use of sensitive Personal Information under the CPRA.
- **Right to Limit Use of Sensitive Personal Information.** You have the right to limit the use of your sensitive Personal Information when such use goes beyond that which is necessary for providing the Services or certain other permissible purposes like fraud, customer service or quality control. Sensitive information includes Social Security number (or country-specific equivalent), driver's license number, biometric information, precise geolocation, and racial and ethnic origin. However, Jaeger does not process sensitive Personal Information in a manner which gives rise to this right.

To exercise your privacy rights, you may write to us at privacy@jaegerrdx.com or by contacting us toll-free at 1-800-231-2466. To opt out of the sale or sharing of your personal information via cookies, please visit Do Not Sell or Share My Personal Information or utilize the opt out preference signal to instruct us to not sell or share any of your personal information collected online. The opt out preference signal will apply to the device, platform, or browser in which you utilize it. You can utilize the opt out preference signal by turning on the signal in your device, platform, or browser settings.

For requests submitted via telephone, you must provide us with sufficient information that allows us to reasonably verify you are the person about whom we collected the Personal Information and describe your request with sufficient detail to allow us to properly evaluate and respond to it. In doing so, we will take steps to verify your request by matching information provided by you with the information we have in our records. If we are not able to verify your identity for access and deletion requests with the information provided, we may ask you for additional pieces of information.

Only you, or a person that you authorize to act on your behalf may make a request related to your Personal Information. If you are an authorized agent making a request on behalf of another individual, you must provide us with signed documentation that you are authorized to act on behalf of that individual.



JAEGER APPLICANT PRIVACY NOTICE

RIGHTS OF ALL APPLICANTS

Regardless of your state of residence, you may be entitled to certain rights under applicable labor laws. For more information, please email us at privacy@jaegerrdx.com include "Labor Law Inquiry" in the subject line.

RIGHTS OF INDIVIDUALS IN THE EUROPEAN UNION AND UNITED KINGDOM

Individuals in the European Union and United Kingdom are entitled to certain rights under **GDPR** and the Data Protection Act 2018 ("**DPA**"), respectively. To the extent these laws apply to our processing of your Personal Data, you are entitled to the following rights:

- **Right to access:** You have the right to ask us for copies of your Personal Data, regardless of the legal basis for the processing. However, this right has some exemptions, which means you may not always receive all the Personal Data we process. This applies to any of the Personal Data and/or sensitive information that we process on the legal basis of consent, performance of a contract, legal obligation or legitimate interest.
- **Right to rectification:** You have the right to ask us to rectify Personal Data you think is inaccurate or incomplete, regardless of the legal basis for the processing. This applies to any of the Personal Data and/or sensitive information that we process on the legal basis of consent, performance of a contract, legal obligation or legitimate interest.
- **Right to erasure:** You have the right to ask us to erase your Personal Data associated with your job application, except when the legal basis for the processing is to fulfill our legal obligations, or to carry out a task in the public's interest.
- **Right to restrict processing:** You have the right to ask us to restrict the processing of your Personal Data, regardless of the legal basis for the processing. This applies to any of the Personal Data and/or sensitive information that we process on the legal basis of consent, performance of a contract, legal obligation or legitimate interest.
- **Right to object to processing:** You have the right to object to our processing of your Personal Data when the legal basis for the processing is pursuant to our legitimate interests or to carry out a task in the public's interest. This applies to any of the Personal Data and/or sensitive information that we process on the legal basis of legitimate interest.

Right to data portability: You have the right to ask that we transfer the Personal Data you gave us from one organization to another or give it to you. However, this right only applies when: (i) you have provided your Personal Data to us; (ii) the legal basis for the processing



JAEGER APPLICANT PRIVACY NOTICE

is your consent or for the performance of a contract; and (iii) the processing is carried out by automated means. This applies to any of the Personal Data and/or sensitive information that we process on the legal basis of consent, performance of a contract.

- **Right to lodge a complaint:** You have the right to lodge a complaint with the relevant [Supervisory Authority](#).

To exercise these rights, please contact privacy@jaegerrdx.com.

INFORMATION SECURITY

We implement appropriate technical and organizational security measures, such as access controls and encryption and 24-7 threat monitoring, to protect the Personal Data that we collect and maintain from unauthorized access, destruction, use, modification, or disclosure. However, no security measure or modality of data transmission is 100% secure, and we are unable to guarantee the absolute security of the Personal Data we have collected from you.

RETENTION OF YOUR PERSONAL DATA

We process your Personal Data for as long as our processing purposes, the legal retention periods, and our legitimate interests in documentation and keeping evidence or when storage is a technical requirement. If there are no contrary legal or contractual obligations, we will delete your information after the applicable retention period. However, if you are hired, your information will become part of your personnel file and subject to our Employee Privacy Notice, available on the company's intranet. We may need to use and retain your personal data for longer than these reasons for purposes of:

- **Compliance with our legal obligations.** For example, retaining your employee records (if hired) the purpose of accounting, dispute resolution and compliance with labor, tax and other financial regulations.
- **Meeting our safety and security commitments.** For example, keeping our properties secure and preventing fraud.
- **Exercising or defending legal claims.** We also may need to retain information for longer than the above periods in order to meet with legal process or enforceable governmental request, or to enforce our Terms of Use, including investigation of potential violations.

INTERNATIONAL TRANSFERS

As part of the recruitment process, Jaeger may transfer your personal data to recipients in countries outside of the European Economic Area, British Isles, or the UK that may have differing data protection laws (e.g., United States, India, China, and Brazil). The European Commission has



JAEGER APPLICANT PRIVACY NOTICE

ruled that Jersey, Guernsey, and Canada offer adequate levels of data protection in their domestic legislation and transfers to these jurisdictions are, therefore, permitted under applicable law. However, this also includes countries which the EU Commission, British Isles, and UK does not consider to have an adequate level of protection for personal data. If this occurs, we will ensure there is a legal ground for the transfer in accordance with applicable data protection legislation. You will also be informed about the legal ground, what safeguards were implemented, and where you can obtain a copy of information on these safeguards. Within Jaeger, its subsidiaries, and affiliates, we have also put in place an intercompany agreement which contains the Standard Contractual Clauses approved by the European Commission to ensure that all transfers of Personal Data to any member of the Jaeger group are protected to the same level as required under European data protection legislation.

AUTOMATED DECISION-MAKING

As part of our recruitment process, we use automated tools provided by LinkedIn Recruiting to assist with the initial screening of applications. This means that some applications may be automatically reviewed to determine whether they meet the minimum requirements for the position, based on the information provided by the applicant. The automated system compares your qualifications, skills, and experience to the criteria specified for the role. If your application does not meet these criteria, it may not proceed to the next stage of the recruitment process. This automated screening is used solely to support our recruitment team in efficiently identifying candidates who meet the basic requirements for a role. All subsequent stages of the recruitment process involve human review.

The information and rights regarding automated decision-making apply only to applicants located in the European Union (EU) or European Economic Area (EEA). If you are subject to automated decisions and these have a legal (or similarly significant) effect on you, you have the right to contest the decision, to express your point of view, and to request a human review of the decision. If you would like more information about automated decision-making or wish to exercise your rights, please contact us using the details provided in this notice.

CHANGES TO THIS PRIVACY NOTICE

Jaeger reserves the right to update or modify this Privacy Notice in our sole discretion at any time without prior notice. If we do, we will post the changes to this site, and will indicate the date the changes go into effect. We encourage you to review our Privacy Notice to stay informed. If we make changes that materially affect your privacy rights, we will notify you via email and obtain your consent, if required.

CONTACT US



JAEGER APPLICANT PRIVACY NOTICE

If you have any questions or concerns regarding this Privacy Notice, you can contact Jaeger by email at privacy@jaegerrdx.com, by telephone at 1-800-231-2466, or by sending a letter to:

If you are in the United States:

Director, Global Privacy, Legal Department
Jaeger Medical America, Inc.
c/o Jaeger Medical International, Inc.,
725 Baransway Drive, London ON, N5V 5G4

If you are outside the United States:

Director, Global Privacy, Legal Department
Jaeger Medical GmbH
c/o Jaeger Medical International, Inc.,
725 Baransway Drive, London ON, N5V 5G4

Updated: November 28, 2025