Global Privacy Notice for Recruitment

This Recruitment Privacy Notice (hereinafter "Privacy Notice") explains how Bolt Technology OÜ and its group companies (hereinafter "Bolt" or "We") processes your (hereinafter "You" or "Data Subject") personal data during the application and recruitment process.

1. Personal data we process

We only process the following personal data we need for the activities related to the application and recruitment process:

Contact details: such as name and surname, phone number, email address. Sources of collection of data: we get this data from you when applying for a position in Bolt. We may also get this data from a third party who refers you for a position.

Information included in your CV and/or cover letter: such as employment history, academic background, skills and experience, languages spoken and written, recommendations and referees and any other information submitted by you. Sources of collection of data: we get this data from you when applying for a position in Bolt. We may also get this data from the referees that you provide.

Information related to assessing your suitability: such as information given in screening questionnaires, personality assessment questionnaires, interviews, and test results undertaken during the recruitment process. Sources of collection of data: we get this data from you when applying for a position in Bolt. Some data is generated during the recruitment process. We may also receive this data from third-party tools we use for recruitment-related assessments.

Copy of identification document: such as ID or passport copy. Sources of collection of data: we get this data from you prior to entering into the employment contract.

Compensation and payment or benefits related information: such as salary, bank account details. Sources of collection of data: we get this data from you prior to entering into the contract. Some data is generated during the process of preparing the agreement.

Employment visa sponsorship related information: such as information about whether you need sponsorship for employment visa status and related identity, travel and working documents.

Criminal record checks if required by the law: Source of collection of data: we get this data from you when applying for a position which requires such background checks.

General communications: such as recruitment process related e-mails or other communications. Sources of collection of data: this data is generated during the recruitment process.

Audio or video recordings of interviews: We may record and transcribe interviews using AI-powered tools to help our interviewers take notes and prepare feedback. Transcripts and AI-generated summaries are reviewed by our recruiting team and may be used for internal training to improve our recruitment processes. You will be informed before your interview begins and may opt out of recording at any time without this affecting your application. Sources of collection of data: this data is generated during the recruitment process.

AI-processed application data: When you apply for a role at Bolt, your CV, application form responses, and professional profile information may be processed by AI-powered tools that assist our recruiting team with searching our candidate database, personalising candidate communications, and supporting recruitment workflows. Sources of collection of data: this data is provided by you as part of your application and processed using AI tools during the recruitment process.

We may also get the data from external recruiters and agencies who carry out the recruitment process on behalf of Bolt as a partner. In our application form you can find questions which are intended to help us learn about the candidates applying to Bolt. Answering these questions is voluntary and all

data will be handled anonymously. This means that the data submitted will be aggregated and not linked to you as the job applicant. Therefore your responses will in no way impact your opportunity to work with us, nor affect your application or hiring process.

2. The purposes and the legal grounds for the processing of personal data

We only process personal data when we have defined a relevant purpose and legal ground for the processing. The purposes and the legal grounds for the processing of personal data are the following:

2.1 Legitimate interest

Purposes of processing	Categories of data
Evaluate your application and suitability for a position	Contact details; Information included in your CV and/or cover letter; Copies of relevant documents; General communications; Information related to assessing your suitability; Information related to employment visa sponsorship
Contact you about your application and recruitment process	Contact details
Evaluate referred candidates	Contact details; Information provided by the person referring you for a position; Information included in your CV and/or cover letter; Information related to assessing your suitability
Taking notes of the interview	Audio and video recording of interviews
Internal training	Audio and video recording of interviews
AI-assisted interview transcription, summary generation, and feedback aggregation	Audio and video recordings of interviews; interview transcripts; structured interview feedback
Detecting and preventing fraudulent job applications	Application data; submitted profile information; documents
Re-engaging past candidates from our talent pool for relevant new roles	Past interview records; historical interview feedback; candidate profile data held in our ATS
Personalising candidate outreach communications	Contact details; professional work history and skills

2.2 Processing is necessary to take steps prior to entering into a contract

Purposes of processing	Categories of data
Preparing the agreement	Contact details; Copy of identification document; Compensation and payment or benefits related information; Information related to employment visa sponsorship

2.3 Processing is necessary for compliance with a legal obligation

Purposes of processing	Categories of data
Evaluate your suitability for a position	Criminal record checks

3. Recipients

In some circumstances we are legally obliged to share information with external recipients. For example, under a Court Order or where we cooperate with a data protection supervisory authority in handling complaints or investigations. We can also respond to requests, such as those from law enforcement agencies, when we have a good-faith belief that the response is required by law in that jurisdiction or furthers a public interest task, affects users in that jurisdiction, and is consistent with internationally recognised standards. In any scenario, we'll always satisfy ourselves that we have a lawful basis on which to share the information, and we'll make sure that we document our decision.

Depending on the location of the applicant, the personal data may be disclosed to the Bolt Technology OÜ group companies and partners (local subsidiaries, representatives, affiliates, agents etc). Processing of personal data by Bolt Technology OÜ group companies and partners will occur under the same strict conditions as established in this privacy notice.

We may also share candidate personal data with trusted third-party service providers who support our recruitment and selection processes. These include providers of recruitment software, applicant tracking systems, assessment and testing tools, video interviewing platforms, scheduling or communication tools, and AI-powered recruitment tools. Such third parties process personal data only on our documented instructions and in accordance with applicable data protection laws. We require all such providers to implement appropriate technical and organisational measures to protect the confidentiality and security of personal data and to use it solely for the purposes of providing their services to us in connection with recruitment. Further information about how AI tools are used in our recruitment process is set out in Section 4 below.

We generally do not transfer your personal data outside of the European Union (EU) or the European Economic Area (EEA), nor to such third country or international organization, where the level of data protection of which the European Commission has not considered adequate. If your personal data is transferred outside of the EU or EEA, such transfer of personal data will take place only upon appropriate legal basis, and we will take appropriate protective measures. You have the right to obtain additional information about the transfer of your personal data by sending the relevant request at privacy@bolt.eu.

4. Use of Artificial Intelligence in Our Recruitment Process

Bolt uses AI-powered tools to support our recruitment process. We use Ashby, our applicant tracking system, which includes AI-powered features that assist our recruiting team with transcribing and summarising interviews and interview feedback, searching and filtering our candidate database, re-engaging past candidates, personalising candidate outreach, scheduling interviews, and supporting wider recruitment workflows. For some roles, we also use AI-powered tools to conduct initial interviews and assess your answers against job-related criteria to support our recruiting team's evaluation of your suitability for the role. Bolt does not use AI tools to make autonomous decisions — all decisions on whether to advance, hold, or reject a candidate are made by a human member of our recruiting team.

We use BrightHire or Ashby to record and transcribe interviews. You will be informed before your interview begins and may opt out of recording at any time without this affecting your application.

To request information about how AI tools were involved in the evaluation of your application, contact privacy@bolt.eu.

5. Your rights

Your right of access

you have the right to know, whether personal data concerning you are being processed or not, what is the purpose of processing and what are the categories of personal data. Besides, to whom the personal data is disclosed (especially the recipients in third countries), for how long the personal data is retained and what are your rights concerning rectification, erasure and restriction of the processing.

Your right to rectification

you have the right to demand rectification of the personal data concerning you if the data are inaccurate or incomplete.

Your right to erasure

in some cases, you have the right to demand erasure of the personal data concerning you, for example in case when you withdraw your consent and there are no other legal grounds for the processing of the personal data.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. This means that your data can only be used for certain things, such as legal claims or to exercise legal rights.

Your right to object to processing

you have the right to object the processing of personal data, which is processed based on the legitimate interest, including profiling. Upon objection, we will no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

Your right to data portability

if processing of your personal data is based on your consent or the contract with us and the data processing is carried out by automated means, then you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format. Also, you have the right to claim to transmit those personal data to another data controller if it is technically possible.

Your right to request an explanation

in certain circumstances, you may have the right to receive a clear and meaningful explanation of how an AI system was involved in a decision about you, and the key factors that led to that decision.

6. Retention of personal data

Your personal data shall not be kept for longer than is necessary for the recruitment process as following:

- If you are not selected for the position, then we will store your data for 2 years to resolve possible disputes arising from the recruitment process. We anonymise your data after this retention period lapses, unless we request your permission to store your data for an extended period of time.
- If we conclude an employment contract with you, then we will store the personal data collected during the recruitment process for at least the duration of the employment relationship.

7. Dispute resolution

Disputes relating to the processing of personal data are resolved through customer support (info@bolt.eu) in the first instance. You have the right to contact Bolt's Data Protection Officer (privacy@bolt.eu).

Our supervisory authority is the Estonian Data Protection Inspectorate (www.aki.ee).

8. Making this notice great

We hope you have found this privacy notice easy to understand. Data protection laws are important. They strengthen rules and enhance your information rights. Many of these rules may appear complicated, but most are grounded in common sense. We take our responsibilities with your data seriously. Bolt will continue to make changes to this privacy notice as part of our commitment to protecting your privacy and affording you even more transparency.

Date when this Privacy Notice was last updated: 22 June 2026