

Group Privacy policy for Job Applicants and Recruitment

This is Version 1, dated January 2026

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1. Introduction

- 1.1 The privacy policy for job applicants in connection with the recruiting process (the "Policy") describes how PureGym ("us", "we", or "our") collects and processes personal data relating to job applicants as part of the recruiting processes. We are committed to being transparent about how we collect and use your personal data and meeting our data protection obligations. As a controller, we collect and process personal data about you when we handle your job application and during the recruiting process.
- 1.2 This Privacy Notice is issued on behalf of the Group PureGym Ltd. Each employing entity acts as a data controller for the personal data of its employees.

Country	Employing Entity	Address	Regulator
UK (Lead Data Controller)	PureGym Ltd	Town Centre House, Merrion Centre Leeds LS28LY	ICO
Denmark	PureGym A/S	Torveporten 2 2500 Valby	Datatilsynet
Switzerland	PureGym AG	Grabenwisstrasse 5 8604 Volketswil	FDPIC
USA	PureFitness	6701 Frontier Drive Springfield, Virginia 22150	N/A (State Laws Apply)

2. Types of personal data we process about you

- 2.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data may include the following types of personal data:

- name
- email address
- telephone number
- home address
- criminal convictions (when necessary)
- CV
- educational documents
- nationality
- community background (for Northern Ireland candidates)

- 2.2 Depending on the circumstances and only when it is strictly relevant and necessary, we may process special categories of personal data (so-called "sensitive personal data"). This may include information concerning a person's health (illness, diagnosis, etc.). We process these sensitive personal data for the following purposes:

As part of our commitment to ensuring an inclusive and accessible recruitment process, we may collect information about any disability, health condition, or access requirements you have, when you voluntarily provide this information to us. We collect

this information solely so that we can make reasonable adjustments to support you during the recruitment process.

- 2.3 If we need to collect more personal data than what is specified above, we will inform you about this. Such information may be provided by updating this Policy.

3. Purposes for processing the personal data

- 3.1 The personal data we collect about you are processed for the following purposes:

- a) To be able to create and maintain a directory of relevant candidates for positions in our organization.
- b) To process job applications and recruit relevant candidates.

4. Legal basis for processing personal data

- 4.1 We only process your personal data when we have a legal basis (lawful reason) to do so. Depending on the specific circumstances, the processing of personal data is done on the following legal bases:

- a) If we have asked for your consent to process some specific personal data, the legal basis for the processing of such personal data is your consent. You can always withdraw your consent by contacting us via the contact details provided at the end of this Policy. If the consent is withdrawn, the personal data processed on the basis of your consent will be deleted, unless it can or must be processed, for example, to comply with legal obligations.
- b) The processing is necessary and carried out in the Organization's legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

- 4.2 Depending on the circumstances and only when and to the extent strictly relevant and necessary, we may process special categories of personal data (so-called "sensitive personal data"). Such processing is based on the following legal bases:

- a) After collecting your explicit consent. You can always withdraw your consent by contacting us via the contact information provided at the end of this Policy. If you withdraw your consent, the personal data processed on this basis will be erased, unless it can or must be processed for other reasons such as our compliance with a legal obligation.
- b) The processing is necessary to establish, exercise, or defend a legal claim after applicable laws.
- c) The processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law or a collective agreement pursuant to relevant laws, which provides for appropriate safeguards for the fundamental rights and the interests of the data subject.

5. Disclosure and transfer of personal data

- 5.1 We only transfer personal data to other entities when allowed or required to do so by applicable legislation.

6. Erasure and retention of personal data

- 6.1 We ensure that your personal data is deleted when it is no longer relevant for the processing purposes as described above.

If you are offered a position and become an employee at PureGym, your personal data from the job application and data from the recruiting process are transferred/moved to our regular HR management system.

If you are not offered a position at PureGym, your personal data is erased after 12 months in accordance with applicable law, unless we have a legal obligation to retain it for longer.

Notwithstanding the above, specific reasons related to employment law may necessitate the continuous processing of personal data. This may have different implications. For example, we may process the applications for a longer period to prove that there was no unlawful discrimination in the selection process when we consider this necessary.

Similarly, it may be relevant to process the personal data for an extended period of a maximum of a further 12 months if a similar relevant position may become available during this period. When this is the case, we will notify you of the extension of the retention of your personal data, which you can opt-out of at any time. In these instances, our legal basis for the extension of retaining your personal data is legitimate business interests.

If you have any questions about our retention of your personal data, please contact the email mentioned under the last section of this Privacy Policy.

7. Your rights as a data subject

- 7.1 You have a number of rights in relation to your personal data and privacy:

7.1.1 You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.

7.1.2 You have the right to have incorrect information rectified.

7.1.3 You have the right to have certain personal data deleted.

7.1.4 You may have the right to restrict our processing of your personal data.

7.1.5 You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation.

7.1.6 You have the right not to be subject to a decision based solely on automated means, without human interference, unless the decision is necessary for your employment, the decision has a legal basis, or is based on your explicit consent.

7.1.7 If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal of consent.

7.1.8 You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).

7.1.9 You can always lodge a complaint with a supervisory authority.

- 7.2 Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.
- 7.3 In connection with inquiries concerning your rights, we ask that you provide us with adequate information to process your inquiry, including your full name and your email address, so that we may identify you and respond.

8. **Changes to this Policy**

- 8.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

9. **Contact**

- 9.1 You may contact us at the email address below if you:

- disagree with our processing or consider our processing of your personal data infringes on the law,
- have questions or comments to this Policy, or
- want to invoke one or more of your rights as a data subject described in this Policy.

If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at DataRequest@puregym.com

- 9.2 If you have concerns about how we handle your personal data, you have the right to make a complaint at any time to the relevant authority body.
- In the UK, this is the Information Commissioner's Office (ICO)
 - In Denmark, this is the Danisha Data Protection Agency.
 - In Switzerland, this is the Federal Data Protection and Information Commissioner (FDPIC)
 - In the US, this is the Federal Trade Commission (FTC), or, your State-specific privacy regulator if applicable.