

**U.S. PROSPECTIVE EMPLOYEE PRIVACY NOTICE**

This Prospective Employee Privacy Notice (this “Notice”) describes, among other things, how Travel Leaders Group Holdings, LLC (d/b/a Internova Travel Group) (“Internova” or “Company”) collects, processes, and uses your personal information (“Personal Information”) during your recruitment process with Internova.  Should You be selected for a position at Internova, you will be provided with Internova’s U.S. Employee Privacy Notice, which further explains the processing of your Personal Information for purposes of concluding an employment contract with Internova and processing during and after the expiration of the employment relationship.

**INFORMATION THAT WE COLLECT**

We collect Personal Information from you when you provide it to us, such as when you communicate with us and submit information to us as part of the application process. We may also collect your Personal Information from third parties, such recruiters who share information about potential candidates with us. We may collect and process the following Personal Information:

* Personal contact details such as name, job title, home addresses, telephone numbers, and personal email addresses;
* Recruitment information (including copies of right to work documentation, references, and other information included in a resume or cover letter or as part of the application process);
* Date of birth;
* Gender;
* Information about professional qualifications;
* Race and Ethnicity;
* Employment history (as included in a resume or cover letter or as part of the application process);
* Inferences from any of the Personal Information categories we collect; and
* Any other information that you voluntarily provide to us.

**SOURCES OF PERSONAL INFORMATION**

The above information may be collected in the following methods listed below:

* Resume(s)/curriculum vitae(s);
* Contact details for references and references feedback;
* Information provided during job forums and recruitment events;
* Information obtained through social media or networking sites;
* Information forwarded by recruitment agencies; and/or
* Pre-employment screening services.

Note, the above information is received by Internova in various forms including hard-copy and electronic form, delivered in-person or via email, fax, website, social media, etc.

**PURPOSE OF PROCESSING**

During the recruitment process, we only process data that is necessary to assess your suitability for the position you are applying to and, in the case of a successful candidacy, for the conclusion of the employment contract.

**DISCLOSING YOUR PERSONAL INFORMATION**

Access to your Personal Information within Internova is limited to employees and staff who need to access the data for the performance of their work-related tasks and duties involving the recruitment process.

We will only transfer your data to third parties if it is necessary for the recruitment process. For example, we may use third party service providers, such as cloud services providers, who might have access to your Personal Information.

We do not sell Personal Information we collect about our prospective employees or share it with third parties for cross-context behavioral advertising. In addition, we do not use or disclose sensitive Personal Information for purposes other than the business purposes specified above.

**YOUR PERSONAL INFORMATION RIGHTS**

To the extent any data privacy law applies to the collection of your Personal Information, you may have certain rights in relation to your Personal Information. Subject to any limitations or exceptions under the law, these rights may include any of the following:

* *Right to Know / Access Your Personal Information, and Right to Receive Information regarding Sale of Personal Information*. You may have the right to know and right to access what Personal Information is processed by Internova and have the right to request that we provide you with information regarding what Personal Information about you we have collected, used, disclosed, or sold. Specifically:
	+ The categories of Personal Information we collect about you;
	+ The categories of sources from which we collected your Personal Information;
	+ The business or commercial purposes for collecting, selling, or sharing your Personal Information;
	+ The categories of third parties with whom we disclosed your Personal Information;
	+ The specific pieces of Personal Information we collected about you;
	+ The specific pieces of Information we hold about you; and
	+ The categories of Personal Information we have sold or shared about you to third parties and the categories of third parties to whom the Personal Information was shared or sold. As noted above we do not sell or share Personal Information.
* *Right to Correct Inaccurate Personal Information*. If you believe that Internova holds any incomplete or inaccurate data about you, you may have the right to ask Internova to correct and/or complete the information.
* *Right to Delete*. You may have the right to request deletion of your Personal Information collected by Internova.
* *Right to Opt Out of Sale or Sharing of Personal Information*. You may have the right to opt out of the sale or sharing of your Personal Information. However, Internova does not sell or otherwise disclose prospective employee Personal Information for monetary or other consideration to any third parties.
* *Right to Limit Use and Disclosure of Sensitive Personal Information*. You may have the right to direct Internova to limit its use of your sensitive Personal Information to that use which is necessary for the purposes stated above. Internova does not use or disclose sensitive Personal Information.
* *Right to Opt Out of Automated Decision-making Technology*. You may have the right to opt out of the automated processing of your Personal Information.
* *Right of No Retaliation Following Opt Out or Exercise of Privacy Rights*. Internova does not discriminate or retaliate against California residents who exercise their rights under the CCPA.

**DATA SUBJECT REQUESTS**

In order to exercise your rights under this Privacy Notice and applicable data protection laws, you may send an email to privacy@internova.com.

If Internova receives a request from you to exercise any of the above rights, Internova may ask you to verify your identity before acting on the request; this is to confirm that your data is protected and kept secure.

**DATA SUBJECT COMPLAINTS**

If you believe that Internova is failing to adequately meet any of the rights outlined above, you may file a complaint with a relevant Data Protection Authority.  Internova can identify this supervisory authority upon request.

**CONSEQUENCES OF NOT PROVIDING YOUR PERSONAL INFORMATION**

You are not obligated to provide your Personal Information to Internova.  However, as this information is required for Internova to employ you, Internova may not be able to extend an offer of employment or employ you without the provision of certain Personal Information.

**RETENTION OF PERSONAL INFORMATION**

Internova will not maintain your Personal Information longer than is necessary for the purpose for which it was collected.  Internova will process your Personal Information until the end of the recruitment process, i.e., until a suitable candidate has been selected and an employment agreement has been concluded with said candidate. Should you be selected for the position for which you applied, you will be provided with Internova’s U.S. Employee Privacy Notice.

**We may further store Your Personal Information for purposes of possibly considering you for future job openings at Internova. You may request that Internova remove your Personal Information at any time by e-mailing your request to** privacy@internova.com**.**

**SECURITY**

Internova uses commercially reasonable security measures to prevent Personal Information from being accidentally lost or used or accessed in an unauthorized way.  We limit access to your Personal Information to those who have a genuine business need to know it.  Those processing your Personal Information will do so only in an authorized manner and are subject to a duty of confidentiality.  We also have procedures in place to deal with any data security incident. We will notify you and any applicable regulator of a data security incident where we are legally required to do so.

**REVIEW**

Internova may revise this Privacy Notice from time to time and/or will update this Privacy Notice periodically.

**Contact Information**

Internova has appointed/designated Helena Daras, General Counsel that is responsible for this Privacy Notice:

Email: privacy@internova.com

Address: 1633 Broadway, 35th Floor, New York, NY 10019

Last updated: 10 October, 2023