

RECRUITMENT PRIVACY NOTICE

INTRODUCTION

Genius Sports Group is committed to protecting your privacy. This privacy notice explains how Genius Sports Group Limited and the companies in its corporate group (“**Genius Sports**”, “**we**”, “**us**” or “**our**”) use your personal data (or personally identifiable information) when you apply for an opportunity with us. It also advises you of your rights as a data subject and how those rights may be exercised. We will ensure that any information that we collect or that you submit to us when applying for a role will be used only for the purposes set out in this notice.

We keep our privacy practices under review and may amend this notice from time to time. This version is dated May 2025.

ABOUT US

This privacy notice is issued on behalf of the Genius Sports group of companies. When we mention “**Genius Sports**”, “**we**”, “**us**” or “**our**” in this notice, we are referring to the company in the Genius Sports Group that is relevant for processing your personal data.

Genius Sports Group Limited is the data controller responsible for processing your personal data. It is a company registered with Companies House in England and Wales under company number 09706742 and with the Information Commissioner’s Office under registration number ZA198905.

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this notice. If you have any questions about this notice, including any requests to exercise your legal rights, then please contact the DPO using the contact details given at the end of this notice.

PERSONAL DATA WE COLLECT

Broadly speaking, your personal data is any information about you from which you may be directly or indirectly identified. In connection with your application for a role with us, we may collect, store and process the following categories of your personal data:

- The information you have provided to us in your CV or resume and covering letter.
- The information you have provided on our application form, including full name, title, email address, telephone number, LinkedIn profile, authorisation to work, travel time to work, salary expectation, availability to work (including notice period), educational background information and professional background information.
- Communications between you and us in relation to the job application.
- Information relating to interviews, including any information you provide to us during the interview process, our notes taken in interviews and internal records of performance (scorecard feedback).
- Details relating to the role on offer, including salary expectations, availability to start/notice period, distance from work location, authority to work and visa/sponsorship requirements.
- Information obtained through reference checks.
- Information obtained through background checks (please see below for further details).

There are certain types of personal data (referred to as “**special category data**”) that are afforded a higher level of protection under applicable data protection law because they are more sensitive. Special category data include personal data relating to a person’s racial or ethnic origin, religious or philosophical beliefs, trade union membership, genetics, biometrics, health, sex life or sexual orientation.

Information about criminal convictions

Depending on the nature of the role applied for, we may process information about any criminal convictions (but only where it is relevant to the role being recruited). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We may collect your personal data in the following ways:

Directly from you

We may collect personal data directly from you via the careers section of our website if you choose to complete an application form for a role with us. Alternatively, if we have headhunted you, we may receive personal data directly from you, which will be uploaded manually into our recruitment systems by our Talent Acquisition Team.

Recruitment consultancies

We have relationships with a number of recruitment consultancies who may submit an application and associated personal data to us on your behalf. If you apply for a role with us via a recruitment agency, you will be asked to give your consent to the third party sharing your personal data with us for the purposes of your application. Please contact your recruiter for further information on their privacy terms.

Job boards

We use the following third-party job boards from which we receive candidate applications and associated personal data:

- LinkedIn (please see [LinkedIn Privacy Policy](#));
- Indeed (please see [Indeed Privacy Policy](#));
- CV.ee (please see [CV.ee Privacy Notice](#));
- Welcome to the Jungle (please see [Welcome to the Jungle Privacy Notice](#))
- BuiltIn (please see [BuiltIn Privacy Notice](#))
- Levels (please see [Levels Privacy Notice](#))

If you apply for a role with us via a job board, you will be asked to give your consent to the third party sharing your personal data with us for the purposes of your application.

Referrals

If you are referred for a role with us by a Genius Sports employee (under our referral scheme), then we may collect personal data about you from your referrer, including your CV or resume, name and contact details.

Background and credit reference checks

We use Veremark to conduct pre-employment background checks. The background checks undertaken will depend on the seniority of the role you are applying for with us and local laws. For all prospective employees, we will undertake an employment verification check and identification check. For executive or senior management positions, or certain positions in the finance team, we may also require a credit reference check and/or criminal record check, but only where it is directly relevant to the role being recruited.

Before any checks are conducted, Veremark will provide you with a full privacy notice and obtain your consent to proceed.

Publicly available sources

We may process and store relevant personal data about candidates from their LinkedIn profile pages.

HOW WE USE YOUR PERSONAL DATA

Our use of your personal data

We will only use your personal data where this is permitted by law. We have set out below an explanation of the way in which we use your personal data and which of the lawful bases we rely on to do so.

Purpose	Personal data used	Lawful basis for processing	Condition for processing special category data
To assess your skills, qualifications and suitability for the work or role	Contact details, professional/educational background information and details related to the role on offer (including salary expectations, motivation for the role, authorisation to work, distance from work and availability to work). Depending on the role you have applied for, we may use video recording platforms as part of our recruitment process.	Necessary for our legitimate interests (to enable us to hire the people we need to develop and grow our business).	N/A

To communicate with you about the recruitment process and application status, including resolving any complaints or grievances	Name and contact details	Necessary for our legitimate interests (to enable us to hire the people we need to develop and grow our business).	N/A
To carry out background, credit reference and reference checks, where applicable	Depending on the nature of the role applied for, we may collect the below data. Name, contact details, previous employment contact details, passport, driving license, National Insurance number (or local equivalent if not UK-based), employment and educational history, criminal record information and credit check information	Consent (you may withdraw your consent at any time by emailing Veremark at candidate-support@veremark.com or by contacting us using the details in the “Contact and DPO” section below).	Explicit Consent, Necessary to comply with our legal obligations.
To comply with legal or regulatory requirements	Right to work information	Necessary to comply with a legal obligation.	Necessary to comply with our legal obligations.
If you have not been successful in your application for the role, to keep your details on file for any other suitable opportunities with us	Name, contact details, appropriate roles/skillset	Consent (you may withdraw your consent at any time by contacting us using the details in the “Contact and DPO” section below).	N/A
If you have not been successful in your application for the role, to keep your details on file for the purposes of managing recruitment agency referral fees	Name, referring agency, date of application	Necessary for our legitimate interests (to enable us to hire the people we need to develop and grow our business).	N/A
In relation to self-declared disabilities, to	Nature of disability or other requirement requiring adjustment	Necessary for compliance with a legal obligation	Explicit Consent, Necessary to

allow us to make a reasonable adjustment to support your application and any future employment			comply with our legal obligations.
In the event that your application is successful, to generate offer documentation and a contract of employment	Name, contact details, salary	Necessary to take steps at the request of the data subject prior to entering into a contract	N/A
In the event that your application is successful, to transfer your personal data to our internal Human Resources platform in order to create an employee record and begin onboarding	Name, contact details, CV, offer letter	Necessary for the performance of a contract	N/A

We will only use your personal data for the purpose for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will contact you and explain the legal basis which allows us to do so.

Once we have received your application, we will process the information provided to decide whether you meet the requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If you are called for an interview or interviews, then we will use the information you provide to us during the interview process to decide whether to offer you the role or work. Depending on the nature of the role applied for, any offer of work will be conditional upon completion of satisfactory reference and background checks.

If you fail to provide information

We will not be able to process your application successfully if you fail to provide us with required information when requested (for example evidence of qualifications or work history).

If your application is successful

If you are successful in your application for a role with us, your personal data will be transferred to the internal systems we use for collecting, storing and processing the data of our employees and contingent workers. You will be provided with separate information on how your data is processed as an employee or contingent worker.

HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal data with the following third parties either because they process personal data on our behalf or because we are required to do so by law:

- **Companies within the Genius Sports group of companies.** We share your personal data with other companies within the Genius Sports group, including our companies located outside of the United Kingdom (“UK”) and the United States (“US”) (please see the “Cross-Border Transfers” section below for further information).
- **Organisations that provide services to us.** We work with a number of trusted third parties to provide our recruitment platform. In particular, our Talent Acquisition Team uses the following third-party providers:
 - Microsoft Office 365, SharePoint and OneDrive to store and process candidate applications (please see Microsoft’s privacy notice here: [Privacy – Microsoft privacy](#));
 - Greenhouse, a company based in Newtown, Pennsylvania, to deliver our recruitment platform and store the personal data we collect relating to prospective candidates (please see Greenhouse’s privacy notice here: [Greenhouse privacy policy | Greenhouse](#) ;
 - Veremark to provide a background checking service (please see Veremark’s privacy notice here: <https://www.veremark.com/legal/privacy-policy>)
 - Amazon Web Services EU to provide cloud storage (please see AWS’ privacy notice here: [AWS Privacy \(amazon.com\)](#)).
 - HireFlix, a one-way video interview platform that allows us to streamline our hiring process by enabling candidates to record responses to pre-set interview questions. The platform typically stores personal data such as names, contact details, recorded video responses, assessment results.
 - Deel - global payroll and compliance platform that helps us hire, pay, and manage international contractors while ensuring compliance with local labor laws. It facilitates contract management, tax documentation, and payments across different countries. Deel stores personal data such as full names, addresses, bank details, tax information, employment contracts, and identification documents to comply with legal and financial regulations.
- **Our professional advisers.** We share personal data with our professional advisers only where it is required in order for them to provide their advice.
- **Potential buyers.** In the event of a prospective sale of all any part of our business, we may provide access to personal data to a potential buyer, provided that we inform the buyer that your personal data may only be used for the purposes outlined in this privacy notice
- **Governments or our regulators.** We may share personal data with governmental bodies or regulators where required to do so by law.
- **Police, law enforcement and security services.** We may share personal data with enforcement bodies to help them with any investigation, prevention of crime or matter of national security.

In each case, we will only share your personal data where it is necessary to do so. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

CROSS-BORDER TRANSFERS

Regardless of where in the world you are based, we share your personal data with the Genius Sports Group. This will involve transferring your personal data outside of your country, including to locations in which we have offices, namely Australia, Bulgaria, Colombia, Estonia, Italy, Lithuania, Switzerland, the UK and the US.

This means that your personal data will be shared outside of the UK and European Economic Area (“EEA”), where the standard of protection of personal data may be lower than it is in the UK and EEA.

In addition, many of our third party suppliers (please see the “How we Share Your Personal Information” section above) are based outside of the UK and EEA, or have subsidiaries or processors based outside of the UK and EEA, so their processing of your personal data will also involve a transfer outside of the UK or EEA or your originating country.

Whenever we transfer your personal data outside of the UK or EEA, we ensure that a similar degree of protection is afforded to your data as in the UK or EEA by implementing **one** of the following safeguards:

- We will only transfer your personal data to countries that have been deemed by the UK or EEA to provide an adequate level of protection for personal data; or
- We will use standard contractual clauses that have been approved for use in the UK or EEA (as appropriate), together with any supplementary measures required.

Where we use standard contractual clauses and supplementary measures as the relevant safeguard, we will also conduct a transfer impact assessment to ensure adequate protection of your personal data.

Please contact us using the details in the “Contact and DPO” section below if you would like further information on the specific mechanism used when transferring your personal data out of the UK or EEA.

DATA SECURITY

We respect your personal data and have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way or altered or disclosed. In addition, we restrict access to your personal data to those employees, agents and contractors who have a business need to know. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

RETENTION OF YOUR INFORMATION

We will retain your personal information only for the time necessary to fulfil the purposes for which it was collected or as required by any legal, regulatory, tax, accounting or reporting requirements. We may

retain your personal data for a longer period in the event of a complaint or if we reasonably believe that there is a prospect of litigation in respect of our relationship with you.

We will store the following categories of your personal information for the time periods indicated:

Category of personal data	Retention period
Candidate contact details, application details and profile, including all information provided by or on behalf of a candidate in connection with their application, interview notes and records of performance and internal decision-making	If the candidate is successful, seven years after the date on which employment ceases. If the candidate is unsuccessful, one year after the date on which candidate is advised that their application will not be progressed.
Candidate name, referring recruitment agency and date of application	One year after candidate has been accepted or rejected.
Background check information	Six months after background checks have been completed for all background checks except criminal record checks. For criminal record checks, any information relating to criminal conviction history is deleted immediately after receipt, save that a record is retained as to whether or not the check yielded a positive or negative result.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the rights to:

- request access to your personal data;
- request rectification of any mistakes in your personal data;
- request erasure of your personal data;
- object to our processing of your personal data;
- request restriction of processing of your personal data;
- request transfer of your personal data (data portability);
- withdraw your consent to our use of your personal data (only where we rely on consent as the lawful basis for processing).

We may need to ask for information from you to help us confirm your identity and ensure your right to exercise your data privacy rights before we are able to act on your request. We reserve the right to refuse to comply with a request if it is unfounded, repetitive or excessive. Otherwise, we aim to respond to all complete and legitimate requests within one month. Occasionally, it could take us longer to respond if we require further information from you, the subject matter is particularly complex, or you have made a number of requests. In this case, we will notify you and keep you updated.

Further information on each of your legal rights and how to exercise them is set out below. It should be noted that the rights are not absolute but are subject to certain limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

- **Right of access:** You have the right to ask us for a copy of the personal data we hold about you at any time.
- **Right of rectification:** If the personal data we hold about you is not accurate or is incomplete, you have the right to have the data rectified, updated or completed.
- **Right of erasure:** In certain circumstances, you have the right to request that personal information we hold about you is erased – for example, if the information is no longer necessary for the purposes for which it was collected or processed, or if our processing of the information was based on your consent and there is no other legal basis on which we may process the information.
- **Right to object:** In certain circumstances, you have the right to object to our processing of your personal data – for example, you may object to the use of your personal data for direct marketing purposes or you may object to processing based on our legitimate interests, unless there are compelling legitimate grounds for our continued processing.
- **Right to restrict processing:** In certain circumstances, you have the right to restrict our use of your personal information – for example, where you have challenged the accuracy of the information during the period where we are verifying its accuracy.
- **Right to data portability:** In certain circumstances, you have the right to receive the personal data that we hold about you in a structured, commonly used and machine-readable format. This right only applies in relation to personal data that you have provided to us and which is processed by us using automated means. Where the right applies, you may ask us to send the data directly to you or to a third party. However, we are not able to guarantee technical compatibility of the data we provide with a third party's systems.

COMPLAINTS

If you are unhappy about our use of your personal information, you may contact us using the details in the “Contact and DPO” section below. We will investigate your complaint and notify you in writing of the outcome as soon as possible and in any event within 30 days of receiving the complaint.

If you are unsatisfied with our response to your complaint, you may refer your concerns to the relevant supervisory authority in your country. In the United Kingdom, we are regulated by the Information Commissioner's Office (“ICO”). You may make a complaint to the ICO using any of the following contact methods:

Telephone:

+44 (0) 303 123 1113

Website:

<https://ico.org.uk/make-a-complaint/>

Post:

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

CONTACT AND DPO

If you have privacy related enquiries or if you would like to contact us about our processing of your personal information, including to exercise your rights as outlined above, please contact us by one of the methods listed below. When you contact us, we will ask you to verify your identity.

Telephone: +44 (0) 20 7851 4060

Email: privacy@geniussports.com

Post:

Data Protection Officer
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1st floor
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W1D 3QR