



REGULATIONS

ON THE TALENT POOL OF KPMG Caucasus Central Asia*

*KPMG Caucasus Central Asia (CCA) includes KPMG Audit LLC, KPMG Tax and Advisory LLC, KPMG Valuation LLC, KPMG Bishkek LLC, KPMG Armenia LLC, KPMG Georgia LLC, AO KPMG Audit LLC, KPMG Law and Tax LLC, KPMG Valuation and Consulting LLC, KPMG Audit Azerbaijan LLC, Representative office of KPMG Azerbaijan Limited



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1. Definitions

Regulations means Regulations on the Talent Pool of KPMG CCA.

Talent pool means potential Candidates for existing and future KPMG vacancies who are not KPMG employees and KPMG employees who applied for vacancies.

Information means any information (messages, data) irrespective of the form the information was provided.

Candidate means a person (personal data subject) added to the talent pool. The term Candidate refers to an individual who applies for or is seeking employment with us, either on temporary or permanent basis. This also includes candidates applying for internship or other training program in KPMG.

KPMG/KPMG CCA includes KPMG Audit LLC, KPMG Tax and Advisory LLC and KPMG Valuation LLC, KPMG Bishkek LLC, KPMG Armenia LLC, KPMG Georgia LLC, AO KPMG Audit LLC, KPMG Law and Tax LLC, KPMG Valuation and Consulting LLC, KPMG Audit Azerbaijan LLC, Representative office of KPMG Azerbaijan Limited. Each of the above companies are separately or together decide on ways and methods of personal data processing. In these Regulations, "KPMG", "we", "our", and "us" refer to the global organization or to one or more of the member firms of KPMG International Limited ("KPMG International"), each of which is a separate legal entity. KPMG International Limited is a private English company limited by guarantee and does not provide services to clients.

Processing of personal data means any actions aimed at accumulation, storage, revisions, amendment, use, distribution, depersonalisation, blocking and destruction of personal data or as it is determined by applicable data protection law.

Personal data (hereinafter PD) means any information related to a directly or indirectly identified or identifiable personal data subject.

Data subject means identified or identifiable individual to whom personal data relates, or as it is determined by applicable data protection law.

Competent Authority means official body authorized to supervision and responsible for monitoring the application of Applicable Data Protection Law.

Applicable Data Protection Law shall mean to the extent applicable to the KPMG CCA Member Firms from time to time, any and/or all domestic and foreign laws, rules, directives and regulations, pertaining to data privacy, data security and/or the protection of Personal Data, including, but not limited to: (i) Law of the Republic of Kazakhstan "On Personal Data and their Protection" No. 94-V dated 21 May 2013; (ii) Law of the Republic of Uzbekistan "On Personal Data" No. LRU-547 dated 2 July 2019; (iii) Law of the Kyrgyz Republic "On Personal Data" No. 58 dated 14 April 2008; (iv) Law of the Republic of Armenia "On Personal Data Protection" No. 49-N dated 01 July 2015; (v) Law of Georgia "On Personal Data Protection" No. 3144-XI dated 14 June 2023; (vi) Law of the Republic of Azerbaijan "On Personal Data" No. 998-IIQ of 11 May 2010; (vii) the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR"), and the laws implementing or supplementing the GDPR, and (viii) any and all amendments, successor legislation or regulations thereto of any and/or all such privacy/data protection laws;



Applicable law means any laws, regulations (including professional regulations and professional standards), regulatory constraints, obligations, orders or rules (including binding codes of conduct and binding statements of principle incorporated and contained in such rules) promulgated by a Governmental Authority, which apply to the Entity in question (including, for the avoidance of doubt, any which apply as a result of voluntary registration with one or more professional or regulatory bodies in different countries).

2. General Provisions

2.1. These Regulations determine the procedure for creating and maintaining the talent pool of KPMG to fill vacancies, improve activities of KPMG in recruitment, create conditions for professional development of the talent pool resources.

2.2. Processing of PD of Candidates included into the talent pool is made in accordance with the requirements of the applicable data protection law, applicable law, as well as these Regulations.

2.3. Processing of PD of Candidates added to the talent pool is performed in accordance with the following purposes:

- 2.3.1. identifying and evaluating Candidates for potential employment;
- 2.3.2. identifying Candidates for future hiring opportunities that may become available;
- 2.3.3. identifying potential conflict of interest in Candidates;
- 2.3.4. verifying eligibility for the vacancy;
- 2.3.5. conducting reference and/or background checks;
- 2.3.6. contacting with Candidate in relation to potential employment.

2.4. KPMG will not transfer the personal information that was provided by Candidates or by third parties in relation to Candidates to any third parties for purposes of direct marketing.

2.5. KPMG may share information of Candidates with other member firms of the KPMG network for purposes that are related to the employment opportunities which the Candidates are seeking. KPMG also may share PD with the KPMG network for purposes of providing services such as the hosting and supporting of IT applications that will require the transfer of data to other countries.

2.6. KPMG does not use any automated system to carry out any process that will result in automated decision making in relation to Candidate job application.

2.7. These Regulations provide specific information on processing personal data of applicants and shall be read in conjunction with the Privacy Statement which is available on websites (in [Kazakhstan](#), [Kyrgyzstan](#), [Uzbekistan](#), [Azerbaijan](#), [Georgia](#), [Armenia](#)) and provides further detail on how KPMG processes and protects personal data.

3. Procedures for working with the talent pool

3.1. Search for Candidates to be included into the talent pool is performed and coordinated by People Department.

3.2. Talent pool is built from the following sources:

3.2.1. Candidates considered for KPMG existing vacancies but not employed by KPMG;

3.2.2. Candidates whose Curriculum Vitae were received by People Department from external sources (under services agreements with recruitment agencies, in the course of career events, etc.);

3.2.3. KPMG former employees;

3.2.4. KPMG current employees.

3.3. In all above cases Candidates submit their consent for processing their PD to KPMG, inter alia, to be considered for subsequent employment and have his/her PD added to the talent pool.

3.4. The Candidate's PD may include as follows:

1. Surname, first name, patronymic (if any);
2. Information about change of surname, first name, patronymic;
3. Signature;
4. Day, month and year of birth;
5. Place of birth;
6. Information concerning ethnic background;
7. Details of identity document: document title, document number, date of issue, validity of the document, issuing authority;
8. Citizenship (previous citizenship), date of acquisition/loss of citizenship;
9. Residence address, date of registration at the place of residence or stay;
10. E-mail addresses;
11. Contact telephone numbers;
12. Letter of recommendation;
13. Individual identification number;
14. Information about the number, series and date of issuance of the employment record book with records therein;
15. Content and details of the employment contract, services provision/civil contract;
16. Information about the property (property status): vehicles (make, place of registration), addresses;
17. Bank accounts data and numbers;
18. Information specified in originals and copies of personnel orders and documents therein;
19. Information about government and departmental awards, honorary and special ranks, promotions (including description or name of the award, rank or promotion, date and type of regulation on the award or date of promotion);
20. Certification documents;
21. Internal office investigation documents;
22. Information relating to health, medical reports in the established standard form;
23. Information on temporary disability, health information;
24. Information about the social benefits and status (series, number, date of issue, name of issuing authority, which is a basis for provision of benefits and status);

25. Employment data (current employment data specifying in full the position, structural units, organisation name, general and continuous length of service, addresses and phone numbers, as well as details of other organizations with a full name of the previously held positions in them and period of duty in these organisations);
26. Information about education, skills and expertise or special training (series, number, date of issuance of a diploma, certificate, diploma or other document of completion of the educational institution, including name and location of the educational institution, faculty or department, qualifications and specialty at the end of the educational institution, degree, academic rank, knowledge of foreign languages);
27. Professional development and retraining data (series, number, date of issuance of the document of professional development or retraining, name and location of the educational institution, qualifications and specialization at the end of the educational institution);
28. Salary information (including information on fixed salary, increments, taxes);
29. Military registration of persons liable for military service and those qualifying for induction (series, number, date of issue, name of authority issuing the military ID, military occupational specialties, military rank, registration / deregistration data);
30. Data on marital status (marital status, details of the marriage certificate, surname, first name, patronymic of a spouse, children: surnames, first names and dates of birth of minor children);
31. Presence (absence) of a criminal record;
32. Biometric PD (photos in the personal file, photocopies of identity documents with a photo of the owner in the personal file, blood group, height, weight, video images);
33. Biographical information;
34. Information about litigation;
35. Other information relating to the Candidate and identified as PD;
36. Other information provided by the Candidate by his/her own will.

3.4.1. PD listed in 3.4. is not fully mandatory and shall be collected on need-to-know basis. The Data minimization principle shall be considered by KPMG Personnel of People Department in the process of data processing.

3.5. The talent pool is built without specific indication of job positions, based on a Candidate's relevant consent for processing PD to be included into the talent pool.

3.6. For employment purposes, a Candidate may be required to be examined via video test platforms and/or have an online interview via digital platform. These systems could be supported and operated by third parties with which KPMG has contractual relations, and ensure the same level of confidentiality, and provides the necessary level of organizational and security measures.

3.7. Principles of creating the talent pool:

3.7.1. assessment of professional and personal competencies and results of professional activities of the Candidates for inclusion into the talent pool is based on the assessment of his/her CV.

3.7.2. inclusion into the talent pool is made in accordance with Candidates' personal and professional abilities, the level of professional training, the results of professional activity based on equal approach to candidates.

3.8. Personnel of the People department have access to the Candidate PD on the need-to-know basis. Local Head of People department is responsible for access control to the information contained in talent pool.

3.9. Main stages of building the talent pool:

3.9.1. search for Candidates for potential job positions;

3.9.2. assessment and analysis of the Candidates' professional skills, selecting the most relevant job positions;

3.9.3. update and adjustment of the talent pool list.

3.10. The talent pool is based on the relevant selections with due account of forecast current and potential need for personnel at KPMG.

3.11. PD of unsuccessful Candidates is stored for 1 (one) year from the date of vacancy closure. If Candidate provides explicit consent for inclusion him/her in the talent pool, KPMG may retain all information with PD about him/her for the period identified in the consent. In any circumstances the retention period shall not exceed 6 years.

3.12. PD of Candidates shall be destroyed in the following cases:

3.12.1. expiry of the period for PD storage.

3.12.2. when Candidate withdraws his/her consent for PD collection and processing, unless KPMG is obliged to store PD for a longer period in line with the applicable law requirements.

3.12.3. when KPMG takes a unilateral decision to exclude Candidate from the talent pool.

3.12.4. in other cases, established by the applicable law.

3.13. After concluding employment agreement between KPMG CCA and Candidate, the Regulation on Personal Data Protection of KPMG's Employees will be applied to Candidate's information with PD.

4. Conditions of working with the talent pool

4.1. Work with KPMG talent pool is based on the principles of compliance with the applicable law, taking into account current and future needs for filling existing vacancies, creating conditions for professional growth, comprehensive and objective assessment of professional and personal skills of Candidates added to the talent pool.

4.2. Information about Candidates included in the talent pool is confidential. KPMG employees with access to this information must ensure its confidentiality.

4.3. Adding Candidate to the talent pool will not result in employing Candidate to fill the open vacancy and/or signing an employment agreement.

4.4. KPMG People Department employees may use Candidate's contact details when making job offer to open vacancies, as well as contact Candidate for interview purposes, for organizing and conducting of the tests, and update the CV information. If Candidate provides contact details of referee, KPMG People Department employees may use it for the confirmation of the Candidate's experience. KPMG People



Department employees shall receive written confirmation from Candidate on legitimate disclosure of PD of referee before contacting them.

4.5. Head of KPMG CCA People Department and Local heads of KPMG People Department is responsible for organisation, coordination and control over creating and using the talent pool.

4.6. Authorised personnel of People Department shall control:

4.6.1. timely and appropriate collection of all necessary consents of Personal Data Subject for collection and processing their Personal Data, including sensitive and special categories of data, in line with applicable data protection law;

4.6.2. timely revision and deletion of Candidate PD information to exclude excess and unlawful processing of PD.

5. Rights and obligations of the KPMG

5.1. The KPMG has a right to carry out collection and processing of personal data in the line with the applicable law.

5.2. The KPMG is obliged to:

5.2.1. comply with the applicable data protection law, including obtaining written consent of the Candidate for PD collection and processing, except cases when information with PD was obtained via publicly available sources.

5.2.2. take and comply with necessary measures, including legal, organizational and technical, to protect the PD in accordance with applicable law, ensure the PD storage procedure to meet the requirements established by the applicable data protection law.

5.2.3. provide deletion of PD of the Candidate from the talent pool, if there are no other legal grounds for their processing.

6. Rights of the Candidates

6.1. The Candidate shall have right to:

6.1.1. be informed/know that the KPMG have their PDs, as well as receive information including:

6.1.1.1. confirmation of the fact, purpose, sources and methods of PD collection and processing.

6.1.1.2. PD list.

6.1.1.3. PD processing terms, including terms of storage and retention period.

6.1.2. withdraw a provided consent for PD collection and processing by written request via email ccadataprivacy@kpmg.com.



6.1.3. protect their legitimate rights and legal interests as well as require indemnification for violation of their rights. This right can be exercised by lodging a complaint with the competent authority, or other authority including court and according to the applicable law.

6.1.4. demand KPMG CCA not to transfer/disclose PD to third parties without explicit consent, except cases described in clause 3.6 of the Regulations.

6.1.5. demand at any time to be removed from the talent pool, after which the processing of his/her PD should be stopped at his/her request.

6.1.6. exercise other rights provided by the applicable data protection law and Privacy Statement provided on the official websites of KPMG CCA.

6.2. The Candidate can exercise his/her rights as a data subject, address a concern related to data protection or privacy issues as well as withdraw the consent by sending an email (request) to the KPMG e-mail: ccadataprivacy@kpmg.com

Privacy Notice for Candidates for future vacancies

KPMG recognizes the importance of maintaining the privacy, confidentiality, and security of the information that parties entrust us with during the course of business and this includes personal information (sometimes referred to as “personal data”, “personally identifiable information”) that are collected from our Candidates.

In this notice, “KPMG”, “we”, “our”, and “us” refer to the global organization or to one or more of the member firms of KPMG International Limited (“KPMG International”), each of which is a separate legal entity. KPMG International Limited is a private English company limited by guarantee and does not provide services to clients. For more detail about our structure please visit kpmg.com/governance. The term Candidate, or “you” refers to an individual who applies for or is seeking employment with us, either on temporary or permanent basis. This also includes candidates applying for internship or other training program in KPMG.

This Privacy Notice for Candidates provides specific information on processing personal data of applicants and shall be read in conjunction with the Privacy Statement which is available on websites (in [Kazakhstan](#), [Kyrgyzstan](#), [Uzbekistan](#), [Azerbaijan](#), [Georgia](#), [Armenia](#)) and provides further detail on how KPMG processes and protects personal data.

What personal information do we may collect

The personal information that we may collect in the process of your job application and interview with us include, but are not limited to:

- Identity information: such as full name, personal email, job title, citizenship, ID and/or passport number, gender, home address, contact details, marital status;
- Recruitment data: such as education and training, qualifications, current and/or desired salary, CV and application, interview and assessment data, previous work history, recruitment interviewer notes.
- Background data: such as references, vetting and verification information, information displayed on social media or public forums.



—If you are required to complete our on-line tests and participate in on-line interview your video image and voice will be collected as part of video records for purposes and period identified in this privacy notice.

— Other information that Candidate provides on his/her own initiative and free will.

In the course of your application, you may provide a third parties' personal data such as referees, family members or a partner's personal data. Please be aware that it is your responsibility to ensure you are allowed to provide their personal data to us. Where appropriate you have to refer them to this Privacy Notice for Candidate and Privacy Statement.

You have the right not to provide your personal information, at the same time you understand that we will not be able to carry out a due and proper assessment of your application for job opportunity with KPMG.

Where do we collect the information from

In addition to obtaining information directly from you, KPMG may also collect your personal data from third parties, such as recruitment agency, your named referees or from publicly available sources, unless it does not contradict with applicable law.

What do we use the information for

We collect and process your personal data for the purposes of:

- Identifying and evaluating candidates for potential employment;
- Identifying candidates for future hiring opportunities that may become available;
- Identifying potential conflict of interest in candidates;
- Conducting reference and/or background checks;
- Contacting with you in relation to potential employment.

Data security

KPMG has reasonable security policies and procedures in place to protect personal information from loss, misuse, unauthorized or accidental access or disclosure, alteration, or destruction. Despite KPMG's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to a need-to-know basis and KPMG employees who have an access are required to maintain the confidentiality of such information.

For how long do we keep your personal information

We will retain your personal data only for so long as is necessary for the purposes of which these were collected. We retain and use your personal data collected during the recruitment process in order to consider you for new positions, and, where necessary, for our reference should you submit a new application in the future. In any case, we will not keep personal data of unsuccessful candidates for any longer than one year from the date of vacancy closure.

If you received this Privacy Notice as a Candidate who is agree for inclusion in talent pool for Candidates your Personal Data may be retained for period no longer than five years.

Automated processing



KPMG does not use any automated system to carry out any process that will result in automated decision making in relation to your job application.

Transfer of Personal data to other countries

We may share information of Candidates with other member firms of the KPMG network for purposes that are related to the employment opportunities which the Candidates are seeking. KPMG also share personal data with the KPMG network for purposes of providing services such as the hosting and supporting of IT applications that will require the transfer of data to other countries.

Transfer to third parties

KPMG may engage third parties for carrying out services that maintain the recruitment and employment process such as on-line testing, video interview and data storage that will require the transfer of data to other countries. Anyway, KPMG includes in contractual obligations with engaged third parties, personal data protection and information security clauses to secure transferred Personal Data in line with applicable data protection law.

Contact information

Should you have any questions, concerns or complains regarding this Privacy Notice for Candidates or if you would like to withdraw your consent, please email us at ccadataprivacy@kpmg.com