



Schedule 2.1a to the DPA: INSTRUCTIONS – REFAPP REFERENCE CHECKS SERVICE

This schedule constitutes the Customer's instructions to Talentwise pursuant to Article 28 of the GDPR and applies solely to processing carried out within the scope of the Reference Checks service.

Purpose	The Data Processor provides a cloud-based service to facilitate the collection of professional references during recruitment. This includes the provision of Benchmark Insights, which uses grouped demographic categories and anonymized logic to provide the Customer with comparative data.
Processing activities	Talentwise may only carry out the following processing activities in its role as data processor: <ul style="list-style-type: none">• Receive and structure data provided by the Customer, the Candidate, or the Reference;• Send reference requests;• Store and make reference responses available to the Customer;• Collect and structure certain limited demographic data provided in connection with the reference-check process,• Analyze such data, potentially together with reference-check results, in order to generate grouped benchmark insights,• Aggregate and anonymize relevant data for inclusion in the shared benchmark dataset,• Administer user accounts and access rights;• Maintain logs for security and operational purposes;• Provide troubleshooting and support related to the Service, including actions taken on behalf of the Customer;• Delete data in accordance with the Service Agreement.
Categories of personal data	<p>Candidates</p> <ul style="list-style-type: none">• Name• Contact details (telephone number, email address)• IP address• Information provided by Customer when initiating the reference check• Demographic data (Age, Gender, Education level) <p>References</p> <ul style="list-style-type: none">• Name• Contact details (telephone number, email address)• IP address• Reference responses (including free-text responses)• Metadata (time, date, status) <p>Customer's users (e.g. recruiters)</p> <ul style="list-style-type: none">• Name• Company and title• Contact details (telephone number, email address)• Profile image• LinkedIn URL• User and authorisation data• Login and activity logs



Categories of data subjects	<ul style="list-style-type: none">• Candidates in the Customer’s recruitment processes• References designated by the candidate• Users at the Customer (administrators, recruiters, etc.)
Retention period	<ul style="list-style-type: none">• Personal data is retained for twenty-four (24) months, unless otherwise specified in the Service Agreement for Reference Checks.• Logs, technical data, and backups are retained in accordance with Talentwise’s ordinary retention routines.
Limitations	Benchmark outputs made available through the feature shall be based on grouped, aggregated, and anonymized data designed to prevent the identification of individual candidates.

Version history

Version	Date	Change	Comment
2026.01	2026-03-23	Initial supplementary instructions for Demographic Benchmarking.	
2025.02	2025-11-01	Revised to align with Refapp’s new services and to relocate customer-specific terms to the Main Agreement.	