



Schedule 2.1d to the DPA: INSTRUCTIONS – REFAPP INTERNATIONAL BACKGROUND CHECKS

This schedule constitutes the Customer’s instructions to Talentwise pursuant to Article 28 of the GDPR and applies only to the processing of personal data carried out by Talentwise in its role as data processor within the scope of the Refapp International Background Checks service.

Talentwise also processes certain personal data as an independent data controller in connection with the Service. Such processing is not governed by this DPA and is explicitly delineated in these instructions.

Purpose	To enable the Customer to order, administer, and track background checks performed by independent third-party screening providers in connection with recruitment processes.
Processing activities where Talentwise acts as Data Processor	<p>Talentwise may only carry out the following processing activities in its role as data processor:</p> <p><i>Administrative and recruitment-related purposes</i></p> <ul style="list-style-type: none">● Receive and store order data from the Customer (including identity and contact details of the Candidate),● Administer user accounts, access rights, and system settings,● Provide and operate the platform for ordering and managing background checks <p><i>Process management</i></p> <ul style="list-style-type: none">● Transmit order instructions to the applicable screening provider in accordance with the Customer’s selections● Make available order and status information (e.g. “initiated”, “in progress”, “completed”)● Communicate with the Customer and Candidate regarding order status and next steps (excluding report content) <p><i>Support, operations, and security</i></p> <ul style="list-style-type: none">● Maintain logs for security, operations, and troubleshooting,● Provide support in matters relating to ordering and process flow,● Delete personal data in accordance with the Service Agreement and this DPA.
Categories of personal data	<p>Candidates</p> <ul style="list-style-type: none">● Name● Contact details (address, email address, phone number)● Identifiers required for order placement● Administrative information and status-related metadata <p>Customer’s users (e.g. recruiters)</p> <ul style="list-style-type: none">● Name● Contact details● Company and role● Login and activity logs



Categories of data subjects	<ul style="list-style-type: none">• Candidates in the Customer's recruitment processes• Users at the Customer (administrators, recruiters, etc.)
Retention period	<ul style="list-style-type: none">• Order and status data: retained for twenty-four (24) months unless otherwise specified in the Service Agreement• Logs and technical data: retained in accordance with Talentwise's ordinary retention routines
Limitations	<p>Processing carried out by third-party screening providers as independent data controllers is not governed by this DPA and is not performed on the Customer's instructions through Talentwise.</p> <ul style="list-style-type: none">• Background check reports and their content are generated and processed exclusively by the applicable third-party screening provider acting as an independent data controller.• Talentwise does not review, analyse, interpret, or store background check report content.• Any access by Talentwise personnel to report content shall be limited to incidental or technical access strictly necessary for service administration (e.g. transmission of access links) and shall not constitute substantive processing.• Customers access background check reports directly from the screening provider's systems, subject to the screening provider's terms and privacy notices. <p>Nothing in this Schedule shall be construed as appointing Talentwise as a consumer reporting agency or as assuming any obligations under the Fair Credit Reporting Act.</p>

Version history

Version	Date	Change	Comment
2025.02	2025-12-01	Revised to align with Refapp's new services and to relocate customer-specific terms to the Main Agreement.	