

Privacy policy – specific for our recruitment activities

Last updated and reviewed on: **February 2020**

1. Overview

This privacy policy applies to the processing of personal data by Perceptyx with its possible participating interests and affiliates, hereinafter referred to collectively as Perceptyx. We are committed to ensure that our service is open, honest and transparent.

We reserve the right to amend this privacy policy at our discretion and at any time if new developments give rise to this.

2. Which Personal Data do we collect?

Perceptyx collects and processes personal data you provide within you resume and cover letter when applying for a job. The following personal data is common to process when you apply for a job:

- Full name
- Email address
- Address
- Place of residence
- Phone number
- Nationality
- Language(s)
- Gender
- Date of birth
- Employment history
- Work experience
- Education
- Photo
- Letters of reference
- Past performance reviews
- Copy passport¹
- Any other personal data you voluntary provide in your resume or cover letter

Perceptyx also collects and processes information you provide during conversations, in phone calls and/or in emails with our management.

3. For which purposes do we use your personal data?

By applying for a job at Perceptyx, we will collect and process your personal data in connection with our recruitment activities, including but not limited to process your application for:

- evaluating your suitability for a job opening;
- communicating about the recruitment process;
- checking references, possible screening and conducting assessments;
- preparing a job offer and possibly to prepare your employment contract;
- sending job alerts.

Personal data provided when applying for a job opening can be shared with our international staff to determine if you are suitable for a job other than the job you applied for.

¹ In case of international applicants who come to the California office for an interview.

4. Which lawfulness of processing applies?

Perceptyx only processes personal data if there is a legal basis for processing. The legal basis for processing your personal data is legitimate interest. We want to find a suitable candidate for the job and therefore we need to process personal data before offering you employment.

5. Who has access to your data?

In principle, we limit access to your personal data to the employees in our HR department, management and employees that are present during the interviews.

We only share personal data if it is necessary. In that case, we will share data with third parties that help us with screening and/or conducting assessments.

Our recruitment process is supported by Workable. You can find their privacy and security policy here: <https://www.workable.com/privacy/>.

Also, personal data may be accessed by third party IT vendors who support our IT systems. Perceptyx requires these companies to adequately safeguard personal data.

6. How long does Perceptyx store your personal data?

Perceptyx retains your personal data for 24 months and we will delete or de-identify this information after this term.

If you become an employee with Perceptyx, the personal data you provided during the recruitment process becomes part of your employment record, and your data will be processed in accordance with our internal policies.

7. How do we secure your personal data?

We have taken appropriate technical and organizational measures to protect your personal data against accidental or unlawful processing by ensuring that:

- your personal data is protected against unauthorized access or modification;
- the confidentiality of your personal data is assured;
- the availability of your personal data will be maintained;
- vendors have received instructions on how to protect your personal data;
- personnel are trained to treat your personal data in a secure way; and
- actual or suspected data breaches are reported in accordance with applicable law.

8. Your rights to access, modify, delete and object of personal data

You can request to access, rectify, erase or restrict personal data that you provided to us. You have the following rights:

- To access, correct or delete your personal data;
- To withdraw your consent;
- To object to the processing of your personal data by Perceptyx;
- On data portability. This means that you can submit a request to us to send the personal data that we have in electronic form to you or another organization mentioned by you.

For each request, please send an email to privacy@perceptyx.com if you would like to exercise any of your rights. Once we receive and confirm your verifiable request, we will handle your request, unless an exception applies. We will respond to your request consistent with applicable law. If you have a complaint about the way in which Perceptyx processes your personal data, you can report this to the email addresses above. If this does not lead to the desired result, you can also submit a complaint to a national supervisory authority.

9. Where do we process your personal data?

Perceptyx is a global operating organization with headquarters in the United States - California. Your personal data will be stored and processed in the US and possibly in the EU where we have

affiliates and facilities or in which we engage service providers. In some cases, personal data from EU residents may be transferred outside the European Economic Area (“EEA”), but always under the safeguards of Standard Contractual Clauses or the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework, which ensures that Perceptyx, located in the U.S., protects your personal data in accordance with principles agreed between the United States government and the European Commission.

10. Privacy Shield

Perceptyx complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Perceptyx has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Perceptyx receives or processes human resources data from Switzerland for use in the context of the employment relationship under the Privacy Shield and agrees to cooperate with the Swiss Federal Data Protection and Information Commissioner and comply with the advice given by such authorities with respect to this data. Perceptyx complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions. Perceptyx remains liable in accordance with the Privacy Shield Principles if third-party agents that we engage to process such personal data on our behalf do so in a manner inconsistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage. In compliance with the Privacy Shield Principles, Perceptyx commits to resolve complaints about our collection or use of your personal information. Perceptyx has further committed to refer unresolved Privacy Shield complaints to JAMs, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit <https://www.jamsadr.com/> for more information or to file a complaint. The services of JAMs are provided at no cost to you. Perceptyx is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

11. California Consumer Privacy Act (CCPA)

This **Privacy Section for California Residents** supplements the information contained in our policy above and applies solely to all visitors, users, and others who reside in the State of California. As a California based company, we adopt this section to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this section.

Information we collect:

We collect and have collected within the last twelve (12) months the personal information described above in section 2 and 3 that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”) including: Identifiers, Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), Protected classification characteristics under California or federal law, Internet or other similar network activity, Professional or employment-related information and other information about you that is linked to the personal information above.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope.

Use of information

We may use or disclose the personal information we collect for one or more of the business purposes described above in section 2 and 3.

Sharing personal information

In the preceding twelve (12) months, we have disclosed the categories of personal information with third parties described above in section 5.

Sale of Personal Information

In the preceding twelve (12) months, Perceptyx has not sold personal information and does not intend to sell personal information.

CCPA consumer rights

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights. You have the right to access to specific information, data portability and deletion of your data. Once we receive and confirm your verifiable request, we will handle your request, unless an exception applies.

To exercise the access, data portability, and deletion rights, please submit a verifiable request to us by either:

- Calling us at 951-676-4414.
- E-mail us at privacy@perceptyx.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

Contact Information

If you have any questions or comments about this privacy policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us at:

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