

OneTrust Talent Acquisition and Employment Candidate Privacy Notice

Last Updated: May 10, 2023

1. Introduction

OneTrust and its subsidiaries and affiliated entities (collectively, “OneTrust,” “we,” or “us”) are committed to the protection of your privacy. In connection with our talent outreach efforts and/or your application for employment at OneTrust, we must collect, store and process personal information about you to administer talent outreach and evaluate your candidacy for employment. This Talent Acquisition and Employment Candidate Privacy Notice (“Notice”) provides relevant information about how personal information is collected, used, and shared in relation to our talent outreach and all pre-employment activities, including our talent search efforts, initial application, the hiring process and any applicable background checks.

In this Notice, personal information means information that (either in isolation or in combination with other information) enables you to be directly or indirectly identified (“Personal Information”). We are the “controller” of the Personal Information you provide us and will process any such Personal Information in accordance with applicable regulations and the terms in this Notice.

2. Personal Information we collect

We collect your Personal Information to manage our talent outreach efforts and administer our relationship with you beginning when you apply for a position with us and through the start of employment, if applicable. You may apply for a position with us either directly through our website <https://www.onetrust.com/careers/all-jobs/> or indirectly by submitting your application via third parties, e.g., recruitment agencies.

For a list of Personal Information we collect about you, please see Annex 1. If you receive an offer of employment and accept employment with us for the purposes of pre-employment onboarding management your Personal Information is processed pursuant to our Employee Privacy Notice.

3. What about a legal basis?

We need to process your Personal Information to take steps at your request prior to entering into a contract with you. We also rely on our legitimate interests as your prospective employer, or other legal bases in accordance with applicable local law to process your Personal Information during the hiring process. In certain situations, we are also under legal obligations to process certain Personal Information where we make an

offer of employment and need to verify your eligibility to work in a certain country, for example.

In case we need to process sensitive Personal Information, we will rely on your explicit consent disclosed and enacted during your voluntary act to share your sensitive Personal Information with us for the performance of administrative tasks e.g., background checks which we need to perform before we can extend an offer for employment to you.

We collect and use certain types of sensitive Personal Information (e.g., disability status,) in limited circumstances where we must protect your interests (e.g., to provide specific job-related accommodations or accommodations in the application process), where we need to do so to comply with specific legal obligations (e.g., equal opportunity, anti-discrimination, human rights or employment law), or where we have your explicit consent to use it. The types of sensitive Personal Information collected and used are specifically related to the position applied for, and the scope will be explained at the relevant point during the candidate selection process.

The purposes for which sensitive Personal Information may be used include the following:

- Compliance with equal opportunity or anti-discrimination or human rights regulations (where applicable).
- Background checks for employment (where permitted by applicable laws); and
- In the course of legal proceedings (including prospective legal proceedings), complying with regulations, obtaining legal advice, establishing or defending legal claims, or otherwise where strictly necessary for the administration of justice in accordance with applicable regulations.

4. What are the sources of Personal Information we collect from you?

We may collect Personal Information about you from the following sources:

- You, when you submit your application, resume, and other materials to OneTrust.
- Referrals from OneTrust employees.
- Your named references.
- Third-party service providers (see Annex 2 for a full list).
- Publicly accessible sources, such as social and professional networks; and
- Background check service providers (if we extend a conditional offer of employment).

If you choose not to provide mandatory Personal Information when requested and the Personal Information is necessary for us to evaluate your application (e.g., skillset,

education, etc.), we may not be able to process your application further. All mandatory Personal Information is listed in Annex 1.

5. Who do we share your Personal Information with?

To secure smooth and efficient processing of your Personal Information, we rely on one or more of the following third-party service providers (“Third-party/s”) listed in Annex 2. We will only share your Personal Information with the Third-party pursuant to the terms of this Notice, when otherwise required by applicable law, or with your consent. We will obtain assurances from each Third-party with whom we share your Personal Information that it will safeguard your Personal Information in a manner consistent with this Notice. If we learn and have knowledge that a Third-party is using or disclosing Personal Information in a manner contrary to this Notice, we will take reasonable steps to prevent or stop the use or disclosure.

Your Personal Information may also be disclosed or transferred to a Third party in the event of any proposed or actual reorganization, sale, merger, or any other type of corporate action involving any portion of OneTrust, our affiliates, subsidiaries, or all or substantially all of its assets (including insolvency). Should such an event occur, we will direct the transferee to use Personal Information in a manner consistent with this Notice. All current OneTrust affiliates and subsidiaries with employees are listed in Annex 3.

Given we operate a global team, your Personal Information may also be shared or made available internally within the OneTrust corporate group for internal administrative purposes. In this case, our employees may access or have your Personal Information shared with them on a strictly “need to know” basis.

6. For which purposes do we process your Personal Information?

We process Personal Information relating to you for the following purposes:

- Assessing your skills, qualifications, and interests against our job opening requirements.
- Assessing your eligibility for hiring, including the verification of references, qualifications, and criminal records checks data (for certain vetting purposes, where permissible and in accordance with applicable law).
- Verifying the information you provide us during the application process and conduct reference checks and background checks (where applicable) if you are offered a job.
- Assessing the information that you have shared on your electronic social and professional networks and your fit for the position.
- Communicating with you about your application/s and the recruitment process.

- Informing you about other potential job opportunities.
- When necessary and requested by you, providing you with assistance obtaining an immigration visa or work permit.
- Initiating the onboarding procedures to sign and entry into an employment agreement with you.
- Complying with applicable laws (e.g., labor and employment, health and safety, tax, immigration, human rights and anti-discrimination laws), regulations, or legal requirements, including the completion of any reports required by law.
- Using the information in connection with any legal proceedings (including prospective legal proceedings), to comply with laws and regulations, obtaining legal advice, establishing, or defending legal claims, or otherwise where it's strictly necessary for the administration of justice in accordance with applicable laws.
- Other legitimate purposes which are consistent with the management of the job application, the evaluation of your qualifications for the role, and OneTrust obligations to you as a job applicant. In this situation, we may also use your information on day-to-day related operations, such as accounting, financial reporting, and business planning.

We do not sell or share any Personal Information you provide to us through the employment application process for any form of consideration.

7. Protection of Personal Information

We are committed to protecting your Personal Information. We use various technical, organizational, and administrative measures to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction. This includes having comprehensive security policies and procedures in place, performing regular information security risk assessments, and requiring our employees to undergo regular information security awareness training.

8. Right to access, delete, and other rights

In certain jurisdictions, you have the right to request that your Personal Information be updated or removed. You also have the right to have a copy of the information OneTrust holds about you, subject to limitations in applicable law. Further details about these rights are available on our Privacy Overview website. You can change your mind at any time and request to have your Personal Information removed from our database. To do this, you must contact us and let us know you wish to be removed. The request should be made on the [Data Subject Request Form](#).

9. Retention of Personal Information

We will retain and process your Personal Information only for as long as it is necessary for the purposes it was collected unless there is a legal right or obligation to retain your Personal Information for a more extended period. Our goal is to retain your Personal Information for as short period of time as possible. We consider the category of Personal information and how long we need to retain your Personal Information to comply with our legal obligations when we are making decisions on how long we will retain your Personal Information.

In the event that you are unsuccessful, please note that your Personal Information will be automatically deleted upon expiration of the relevant retention period.

10. International data transfers

Personal Information you submit as part of your application will be stored and processed by Greenhouse in the United States, and processed by us there or in other countries as necessary for the purposes of managing your application.

We will always protect your Personal Information pursuant to this Notice wherever it is processed. OneTrust does not voluntarily or actively transfer or disclose applicant's Personal Information to the government or law enforcement authorities (the "Authorities") and/or otherwise grant any Authorities access to your Personal Information. In the event of a request from the Authorities, we have procedures and controls in place to make sure that any such request is assessed according to the procedure outlined in our [Transparency Report](#).

Information for users in the European Economic Area ("EEA") or in the United Kingdom ("UK"):

We may transfer Personal Information from the EEA or the UK to the United States, including Personal Information we receive from individuals residing in the EEA or the UK who provide Personal Information to us in connection with their application for employment.

When OneTrust engages in such transfers of Personal Information, it relies on:

Adequacy Decisions, as adopted by:

European Commission, based on Article 45 of Regulation (EU) 2016/679 (GDPR)
UK Secretary of State, based on Article 45 of the UK GDPR and Section 17A of the Data Protection Act 2018; or

Standard Contractual Clauses, as issued by:
European Commission
Information Commissioner's Office (ICO)

OneTrust may also rely on Data Processing Agreements (as provided under applicable specific regulations) and/or other transfer mechanisms, as provided by the applicable regulations.

11. Updates to this Notice

We reserve the right to update this Talent Acquisition and Employment Candidate Privacy Notice from time to time. We will revise the "last updated" date at the top of this Notice when we do.

12. Contact information

If you have any questions, inquiries, or complaints about our Personal Information handling practices, please contact our Data Protection Officer: DPO@onetrust.com

Our mailing addresses:

Atlanta, GA, USA
1200 Abernathy Rd NE, Building 600
Atlanta, GA 30328
United States

London, England
10 York Rd
London SE1 7ND

Munich, Germany
Mühldorfstraße 8
81671 München
Germany

Madrid, Spain
Paseo de la Castellana 77
28046 Madrid, Spain

Annex 1: A list of Personal Information we collect

- Name
- Date of birth
- Phone numbers
- Home and/or shipping address
- Email
- Personal identifier (i.e. SSN, Social Insurance, National Insurance or Passport Number)
- Signature
- Education, degrees, skills & training history
- Employment information/Previous work history
- Professional experience & affiliations
- Qualifications/certifications
- Salary/wage expectation
- Job application details (e.g., application form, interview notes, references)
- Start date
- Resume
- Languages
- Right to work/work authorization
- Identification document/s

Sensitive Information *(Optional and where permitted by law)*

- Nationality
- Racial or Ethnic Origin
- Gender
- Health related information regarding long term issues (e.g. National Cancer Database if you are a US based candidate or national social security & protection registers)
- Immigration status
- Veteran status

Annex 2. A list of Third-party service providers we use to process Personal Information on our behalf.

- Arete Careers (Agency)
- Synergis (Agency)
- ISG Partners (Agency)
- Cissbury Associates (Agency)
- Oliver Bernard (Agency)
- Jenkin Beattie (Agency)
- Trustpoint One (Agency)
- EuroLondon Appointments (Agency)
- Cavey Dale Group (Agency)
- Number8 (Agency)
- BairesDev (Agency)
- Mitchelllake Group (Agency)
- Peloton (Agency)
- Search Wizards (Agency)
- Hunt Club (Agency)
- Matchking (Agency)
- Onward Search (Agency)
- Orbis Consultants (Agency)
- Thompson Technologies (Agency)
- HackerRank (Assessment Software)
- SeekOut (Recruitment Software)
- Sterling (Background Checks)
- DocuSign
- Glassdoor
- Greenhouse (Applicant Tracking System)
- LinkedIn
- Microsoft (Teams, Power BI, Outlook365)
- Great Place to Work
- Heidrick & Struggles (Agency)
- Spencer Stuart (Agency)
- K2 Partnering Solutions (Agency)
- 10K Advisors (Agency)
- Projectus Consulting (Agency)
- SGF Global (Agency)

Annex 3: Current Affiliates & Subsidiaries with Employees

- OT Technology, Inc.
- OneTrust Canada Inc.
- OneTrust Technology Limited
- OT Technology Spain SL
- OT (Australia) Pty Limited
- OT Privacy Software Private Limited