



WORKHUMAN RECRUITING PRIVACY POLICY

At Globoforce Inc. d/b/a Workhuman (US) and Globoforce Limited trading as Workhuman (Ireland) (“Workhuman”, “us”, or “we”), we are committed to protecting your privacy and complying with our obligations under applicable data protection law (including, with the General Data Protection Regulation 2016/679 (GDPR)). This policy explains how Workhuman collects and uses the personal information you provide in connection with the recruitment process (including through Workhuman’s career portal (the “Career Portal”)), how we protect such information and the choices you have concerning such information. Please note that this policy describes the broadest potential use of personal information, and we may not use your personal information in every way described below.

By submitting personal information to Workhuman in connection with the recruiting activities, recruiting communications or job application processes, you agree to the processing of your data by Workhuman in accordance with this policy.

For additional information about our processing activities in connection with your general use of Workhuman websites and our use of cookies and similar technologies that is outside the scope of this Recruiting Privacy Policy, please see our [Privacy Policy](#).

We are not responsible for the privacy practices of Sites (defined below) that are owned or controlled by third parties.

Type of Personal Information We Collect

As used in this policy, **personal information** is information that directly identifies you or relates to or could reasonably be linked to or associated with you. We collect and maintain different types of personal information about you and if applicable, certain third parties that you may provide personal information about, including the following:

Personal information you provide:

- your name, address and contact details, including email address and telephone number
- details of your qualifications, skills, experience and employment history
- information about your current level of compensation, including benefit entitlements
- information about your entitlement to work in the country you are seeking employment
- certain types of sensitive personal information as described below

This personal information may be gathered directly from you in a variety of ways. For example, in application forms, CVs or resumes, from your passport or other identity documents, or collected through interviews or other forms of assessment.

Personal information from other sources: Workhuman may also receive personal information about you from other sources, such as from referrals, agencies, references, in connection with background or employment checks, target companies where Workhuman conducts due diligence related to a potential acquisition of your employer, and from third party sources like professional head hunters or recruiting firms, data brokers, or if allowed by applicable law other sources such as sites which include, without limitation, social sites or platforms you have joined, where you have created a public page or profile or otherwise given permission so that recruiters can access and use your information (“Sites”), all of which we may combine with the personal information you provide, to process your application as described in the ‘How We Use Your Personal Information’ section below. Further, this information may be stored in a range of different places, including in your application record, in Workhuman HR management systems and on other IT systems.,

Please note that visitors of our Career Portal may elect to notify you about current job postings by providing your name and email address. Our recruitment system will automatically send you a one-time email inviting you to visit the Career Portal to review the job, but Workhuman does not store this information if you do not elect to register with the Career Portal.

Special Category or Sensitive Personal Information

At Workhuman, we've always stood for a society where all people belong. Workhuman maintains an equal opportunity program in some countries in accordance with applicable law. In creating and fostering a diverse and inclusive workforce and/or monitoring equal opportunity, Workhuman may request and process special category or sensitive personal information related to gender, identity, religious or political affiliation, sexual orientation, age, language, abilities/disabilities, veteran status, race, ethnicity, other defining characteristics or as defined in applicable law. You may also voluntarily disclose this type of sensitive personal information to Workhuman during the recruiting process. If not expressly required by the job advert for certain positions, Workhuman does not otherwise require applicants or candidates to disclose this information in connection with a job application or as part of our recruiting activities. However, if you elect to share such information with Workhuman, it will not be Sold or Shared (as the terms Sold and Share are defined in applicable law), used in the hiring or selection process or to determine eligibility for any role. We process this information with your consent (which can be withdrawn by you at any time) or for our legitimate interest in maintaining a diverse and inclusive workforce.

To the extent permitted by applicable law, information related to your COVID-19 vaccination status or any medical or religious accommodation request, infection status or test results may be disclosed to Workhuman and may be subject to additional privacy notices (where required). Further, if you have a disability and would like Workhuman to consider an accommodation, you may voluntarily provide that information during the recruiting process. To the extent information you provide contains special categories of personal information or sensitive personal information, you expressly authorize Workhuman to handle such information as specified in this policy.

How We Use Your Personal Information

We only keep and process your personal information where we have a legal basis to do so. The purposes and bases we rely on are as follows:

- **Legal Obligation:** We may process or disclose personal information to ensure that we are complying with our legal obligations. For example, for Irish candidates, it is mandatory to check a successful applicant's eligibility to work in Ireland before employment starts.
- **Legitimate Interests:** We may process your personal information where it is in line with our legitimate interests as a company, but we will not rely on this basis if your rights and interests would override ours. For example, Workhuman has a legitimate interest in processing personal information from job applicants to manage the recruitment process for existing or future positions, assess and confirm a candidate's suitability for employment, for keeping records of the process and seeking feedback from applicants. If you provide us with your personal information in the recruitment process, we may reach out to you about suitable vacancies in the future.
- **Performance of a Contract:** We may need to process your personal information to take steps at your request prior to entering into an employment contract with you. We may also need to process your personal information to enter into a contract with you.
- **Consent:** We may invite you to provide certain personal information to us in which case we rely on your consent. For example, to support our diversity and inclusion initiatives, we may ask you to voluntarily provide information about your personal characteristics. We will ask for your explicit consent before we collect your information for this purpose and you are free to withdraw your consent at any time.

- Third party Consent: As indicated above, we may collect personal information about individuals you provided to us as a reference. If you provide us personal information about others, we rely on you to obtain appropriate consent from these parties to process their personal information in accordance with this policy.

How We Share Your Personal Information

Your information may be shared internally as part of the recruiting process. This may include sharing with members of Workhuman's HR and recruitment teams, interviewers involved in the recruitment process, hiring managers and IT staff to the extent access to the personal information is necessary for the performance of their job duties.

Workhuman will only share personal information with third parties to the extent required to fulfil the purposes set forth herein, including to contracted service providers to perform services on our behalf (for example, third party Career Portal, employment background check providers etc). Workhuman requires that any such third parties guarantee equivalent levels of protection as applied by Workhuman when handling personal information. We may also share your information with third parties when (i) we are under a legal obligation to do so, including to meet national security or law enforcement requirements or to defend a lawsuit or regulatory inquiry or (ii) in the context of a change of ownership of Workhuman's assets or businesses.

We do not and will not sell, trade or rent your personal information to third parties or share your personal information with third parties for targeted advertising. As a participant of the EU-U.S. Data Privacy Framework ("EU-U.S. DPF"), Workhuman is responsible for onward transfers to third parties that occur under the EU-U.S. DPF.

Note that some of these third parties, such as our background check service providers may also maintain additional privacy policies and notices.

International Data Transfers

Workhuman is a global business with headquarters in Ireland and in the US. Workhuman may transfer personal information to countries other than the country in which the data was originally collected from you and/or was provided to us. These countries may not have the same data protection laws as the country in which you initially provided the information. However, when we transfer your personal information to other countries, we will protect that information in accordance with applicable law. For example, the principal way in which we protect personal information subject to the GDPR that may be transferred to locations outside of the European Economic Area (EEA) to the United States is through Workhuman's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce and/or UK government-approved international data transfer agreements. Workhuman certifies to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal information received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Workhuman has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal information received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

To learn more about the Data Privacy Framework (DPF) program and to view our certification, please visit <https://www.dataprivacyframework.gov/>. Please contact us using the details in the "Contact Us" section below if you require further information on our international transfers.

Your Rights to your Personal Information

You may also have various rights in relation to your personal information. Where required under the laws that apply in your place of residence, you may request the following in relation to your personal information that we control:

- Information: You may request information about how we have collected and used your personal information. We have made this information available to you without having to request it by including it in this Privacy Policy.
- Inspection and access: You can request a summary and/or a copy of any personal information we hold about you.
- Correction/addition/removal: Where you believe your personal information is inaccurate or incomplete, you are entitled to request us to correct, amend or delete it.
- Portability: You may request that we send you any personal information that you have provided to us or ask that we send this information to a third party.
- Objection: You may object to us using your personal information where we use it based on our legitimate interests to do so.
- Restriction: You may request that we restrict the processing of your personal information where you believe it is inaccurate, our processing is unlawful, you believe we no longer need the personal information or if you have objected to our use of it.
- Automated Decision Making: Where we undertake automated decision making (including profiling), which significantly affects you, you are entitled to object to such decision-making. (We do not ordinarily undertake this type of processing.)
- Withdraw Consent: In circumstances where we are relying on your consent to process your personal information you may withdraw such consent by contacting us as indicated below.

To make a request or access this Privacy Policy in an alternative format, please use the contact details provided in the “Contact Us” section below. We may ask for specific information from you to help us confirm your identity. California residents can empower an “authorized agent” to submit requests on their behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.

In some instances, your choices and rights may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested/process your application for a role, or our ability to comply with our legal obligations and enforce our legal rights.

If contacting us does not resolve your issue, you may raise a complaint with the [Data Protection Commission](#).

Security

Workhuman is committed to taking reasonable steps to ensure the security of your personal information. To prevent unauthorized access, maintain data accuracy and ensure the appropriate use of personal information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect. We maintain strict data security systems that ensure specific information will not be made available to any unauthorized person and in order to protect information from loss, misuse and unauthorized access, disclosure, alteration or destruction. When applicable, we use a multi-level, password protected security system to control access to data stored about our candidates for employment. We also maintain strict physical security of our properties and facilities and only provide access to authorized personnel.

Retention of Personal Information

Except as otherwise permitted or required by applicable law or regulatory requirements, accounting or other reporting requirements or obligations as further set forth in the internal Workhuman Data Retention Policy), Workhuman maintains your personal information for the following retention periods:

- If you, or an individual on your behalf such as an external recruiter or personal referral, submit an expression of interest through our website, the Sites, Career portal or by other direct contact with Workhuman, we will retain your personal information for a period of sixty (60) days.
- If you, or a recruiter on your behalf, create an account in the Career Portal, your account information will be retained for three (3) years of from the date you created your account. .
- Workhuman will retain your personal information related to your application for a position for up to three (3) years from the date you applied.
- If you sign up to receive promotional emails, Workhuman will maintain this information until you opt out. If you opt out Workhuman will retain your opt out preference for as long as necessary to comply with applicable law.

After such time, personal information will be securely destroyed or obfuscated so that such data so that it cannot be associated with or tracked back to you. To the extent permitted or required by law, or as requested by you, Workhuman may delete your personal information at any time. As a result, you should retain your own copy of any information you submit to us.

In some cases, in order to comply with applicable law or a legal obligation, Workhuman may deny your request to delete personal information and may retain your personal information for longer than the stated retention timeframe.

Changes to the Privacy Policy

Workhuman reserves the right to change this Policy. If we decide to make changes, we will post the updated policy on our Career Portal so you are always aware of what information we collect, how we use it, and the circumstances, if any, we disclose it. If at any point we decide to use personal information in a manner significantly different from that stated in this Policy, or otherwise disclosed to you at the time it was collected, we will notify you as required by applicable laws.

Concerns and Comments

If you wish to exercise your data protection rights or to raise any concerns, objections or complaints in relation to this Policy, please contact us using the relevant Contact Us details below. If contacting us does not resolve your issue, you may contact your local EU Data Protection Authorities, Swiss users can contact the Swiss Data Protection and Information Commissioner, and UK users can contact the UK Information Commissioner's Office (collectively, "DPAs"). Workhuman commits to cooperate and comply with the advice of the panel established by the EU DPAs, the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal information received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. In addition, the Federal Trade Commission has jurisdiction over Workhuman's compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. It is open to you, under certain conditions, to invoke binding arbitration for complaints regarding Workhuman's compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF where we cannot resolve matters under any of the other mechanisms set out by the EU-U.S. DPF. For additional information, please visit:

<https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>

Globoforce Inc. d/b/a Workhuman is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

Contact Us

You may email us at privacy@workhuman.com, with any questions or concerns regarding this Policy or about any personal information you are asked to provide as part of the recruitment process, if you wish to exercise your data protection rights, or if you have a EU-US DPF related complaint. You can contact us by regular mail addressed to:

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