

WORKATO TALENT ACQUISITION PRIVACY NOTICE

Updated: August 29, 2025

Workato, Inc. and its affiliates (collectively, “Workato”, “we” or “us”) respect the privacy of its job applicants and individuals interested in potential employment opportunities with Workato; we are committed to protecting your personal data and respect local data protection laws. To that end, we have issued this Talent Acquisition Privacy Notice (“**Privacy Notice**”) to give you, the job applicant, a better understanding of how we process your personal information during the recruitment and/or hiring process in order to progress your application, which may culminate in an offer being made to you.

For the purposes of this Privacy Notice, the term “personal data” or “personal information” means any information which relates to an identified or identifiable, living individual that directly or indirectly references one or more factors specific to their physical, physiological, mental, economic, cultural, or social identity. Personal data excludes anonymous data.

We request that you read this Privacy Notice and the related statements in their entirety to ensure you are fully informed.

1. Personal Information We Process.

The types of personal information we process may include the following:

- Name and contact information, including name, alias, postal address, telephone number, e-mail address, emergency contact details, and other contact information;
- Demographic information, including date of birth, gender, age, and information relating to racial and ethnic origin, religious, political or philosophical beliefs, trade union membership or information about your health, disabilities, sexual orientation, gender identity, and transgender status, parental status and military status;
- National identifiers, including national ID/passport number, citizenship status, residency and work permit status, social security number, driver's license number, or other taxpayer and government identification number;
- Application details, including job title/position, office location and/or remote working location, employment contract, offer letter, hire date, knowledge, skills, abilities, and preferences, including learning agility, aptitude, and working style and preferences;
- Background information, including referral names and contact information for referrals, information relating to character and employment references, CV, résumé, cover letter, previous work experience, education information, professional and other work-related licenses, permits, certifications held, credit history, criminal records data and other information gathered from the background check, subject to applicable laws;
- Sensory data, including visual, video, audio, image, physiological, or biological characteristics such as fingerprints, facial and voice recognition;
- Application and device information, including username, unique personal identifier, online identifier, account name and password, information related to your browsing, system, application, communication, technical data, usage and actions, which may include Internet protocol (“IP”) addresses, browser type, referring/exit pages, date/time stamp, clickstream data, and files, emails, messages, calendar, and other content, data and information created, drafted, received, sent, viewed, shared or downloaded;
- Feedback and survey information, including your responses to job application surveys and feedback collected about your interview process;
- Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards, or professional memberships).

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice and, if required by law, seeking your consent. In particular, we have collected the following categories of personal information within the last twelve (12) months.

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists,	NO

Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	student schedules, student identification codes, student financial information, or student disciplinary records.	
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

2. Sources of Collection.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. You may voluntarily provide this information to us by submitting it, including from application forms, CVs or résumés, identity documents, or through interviews or other forms of assessment.
- Indirectly from you. For example, from observing your actions on our websites, sites, device, applications and systems.
- From third-party sources. In some cases, we may collect information about you from other sources, including third parties from whom we purchase personal information, for references, from recruiters, from our corporate transactions such as merger, acquisition and divestment, from our service providers or vendors, such as background check providers, providers and portals, office management or security tools, and from publicly available information, such as information published on social media sites, to the extent permitted by applicable law, and we may combine that information with personal information provided by you.
- If, during the application, we provide you with access to the Workato Platform, such interactions will be governed by Workato's Service Privacy Policy. Any other evaluation tools may additionally have their own privacy policy which the user can access independently.
- If we ask you to provide any other personal data not described above, then the personal data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect it. If we ask you to provide additional personal data that we consider to be mandatory for us to administer your relationship with us, we will inform you of such at the time of collection. In addition, we will also inform you of the consequences for not providing us with the mandatory personal data.

3. The Purposes of Processing the Personal Information.

In relation to your application or your interest about job positions, your information will be used by Workato as necessary to:

- Verify your information and conduct relevant and appropriate legally permitted pre-employment and eligibility verification checks, as well as to assess your skills, qualifications and experience.
- Communicate new career opportunities and the recruitment process including any interviews.
- Contact you for other, future roles which may be of interest to you and aligned to your skillset.
- Complete the selection process and contacting you if we think you would be suitable for a role with Workato.
- Conduct surveys and research activities with the objective of improving Workato's recruitment process.
- Perform analysis of our applicant pool to better understand who is applying to positions at Workato and how to attract top talent.
- Track your browsing and email actions, such as the pages you visited on our website over time and the job postings you viewed, for analytics and job recommendation purposes, and to evaluate your interest in Workato and engage with candidates based on their level of interest in Workato.

- Prevent, monitor, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, and protect the rights, property or safety of Workato, its personnel, guests or others, including cyberattacks and identity theft, tracking your use, communications, and access to or actions within Workato's or Workato-hosted or Workato-provisioned applications, devices, events, and premises.
- Comply with applicable laws, regulations, lawful request, and legal processes, such as to respond to subpoenas or governmental requests.
- Fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about your interview process, we will use that personal information to respond to your inquiry.
- Provide, manage, maintain, support, personalize, improve and develop our websites, products and services.
- Maintain the safety, security, and integrity of our websites, products, and services, other technology assets, and business.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and Workato, including, but not limited to, our Website [Privacy Policy](#).
- Notify you about changes to our website or obtain any required consent.
- For other lawful or legitimate purposes, which may be reasonably required for day-to-day operations.

You acknowledge and agree that Workato may use artificial intelligence, machine learning, or other technologies to enhance its permitted use under this Privacy Notice, subject to its compliance with applicable laws. We may conduct manual review of its use of these technologies, including the output generated by these technologies. We may also process personal information for other legitimate business purposes as permitted under applicable law as necessary to evaluate the job applications, to improve and manage our recruitment process, and to source and search for talents. Lastly, Workato does not subject you to automated decision-making.

4. Disclosure or sharing of Personal Information.

Workato takes care to allow your personal information to be accessed only by those who need such access to perform their tasks and duties, and to third parties who have a legitimate purpose for processing or accessing it. In the preceding twelve (12) months, Workato has disclosed personal information for a business purpose to the categories of third parties indicated in the list below in the following bullet points. As such, we may share your personal information as described in this Privacy Notice to the following categories of recipients:

- To our Affiliates, which include Workato Europe, S.A. and Workato Pte. Ltd, and other Affiliates as updated from time to time.
- To our contractors, advisors, business partners, service providers, and other third parties who require the data to carry out work relating to the job applicant and/or recruitment process on our behalf, provided such parties provide at least the same level of privacy protection as is required of Workato. These companies are authorized to use your personal data only as necessary to provide these services to us or in accordance with their applicable agreements and privacy policies. Examples include applicant tracking systems and professional employer organizations.
- To a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all of our assets (including in the unlikely event of a reorganization, dissolution or liquidation), in which case, personal data held by us about you will be among the assets transferred to the buyer or acquirer.
- To a third party under the following circumstances where we, in good faith: (i) believe we are compelled by applicable law or regulation, judicial request from a court of competent jurisdiction,

or another legal process or government authority; (ii) find it necessary to exercise, establish or defend our legal rights; (iii) seek to enforce or apply our [Website Privacy Policy](#) or terms of any other agreement; (iv) seek to protect Workato's rights or property; (v) seek to protect Workato, our personnel, customers, vendors, guests or other third parties, or the public from harm or illegal activities; (vi) seek to respond to an emergency which we believe, in good faith requires us to disclose data to prevent harm; or (vii) rely on your consent.

Please note that we do not sell (as defined in applicable data protection and privacy laws) your personal information (and will not sell it without providing any required notices and/or opt-in/opt-out rights).

5. Our Retention of Personal Information.

If you are offered and accept employment with Workato, the personal information collected during the job application and recruitment process may become part of your employment record, to be retained throughout and for a period of time after your employment with Workato (specific periods vary by country).

If Workato does not employ you, Workato will retain your personal information according to Workato's document retention policy (30 days except in accordance with law, regulation, or audit requirements, or as extended by consent) after which your personal information will be erased from the recruitment systems. If you want to learn more, please reach out to privacy@workato.com.

6. Legal Basis under which We Process Your Personal Information.

In some jurisdictions, the lawful handling of personal information is subject to a justification, sometimes referred to as a legal basis. The legal bases that we rely on for the lawful handling of your personal information vary depending on the purpose and applicable law.

The different legal bases that we may use are:

- Necessary for the performance of a contract with you. We rely on this legal basis to process your personal information for the purposes of preparing to conclude or concluding an employment contract with you.
- Necessary for the purposes of Workato's legitimate interest. We rely on our legitimate interests when processing your personal information for the purposes of sourcing suitable talent for Workato's workforce.
- Consent. The processing of your personal information is based on your consent where we request this. You can withdraw your consent at any time, which will not affect the lawfulness of the processing before your consent was withdrawn. If you would like to withdraw your consent, you can do so by contacting us at privacy@workato.com.
- Legal obligation. We rely on this legal basis to process your personal information due to obligations stemming from, for example, local labor or tax laws.

If you are an individual in the United Kingdom, European Economic Area and Switzerland (together "Europe"), our legal basis for our collecting and processing of your personal information is as follows:

- Workato's legitimate interests, namely the recruitment, selection, evaluation and appointment of new employees and the management and administration of the recruitment and HR process, to the extent these activities do not prejudice or harm your rights and freedoms.
- Compliance with Workato's legal obligations where employment law or other laws require the processing of your personal information (for example to the extent the law requires the monitoring equality of opportunity and diversity).
- Other legal grounds where applicable such as in your vital interests (for example, health and safety reasons if you attend an interview at our site) and agreements with employee representations (such as Works Councils). If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, contact us at privacy@workato.com.

7. International Data Transfers.

Workato operates as a global business and may process prospect and candidate personal information in countries where:

- We are recruiting for certain talent and roles
- You have applied for a job
- Workato, its recruiters, managers, or Workato subcontractors, customers, or relevant third-party recipients have operations

As Workato is headquartered and conducts global business from the United States, we process personal information in the United States and other countries outside Europe.

Local privacy laws may be different in your home location. For such transfers, we take appropriate safeguards to protect your personal information, fundamental rights and freedoms, and the exercise of your rights in accordance with applicable law by ensuring:

- That the recipient country provides an adequate level of data protection based on the European Commission's adequacy decisions pursuant to Article 45 of the GDPR; or
- We enter into "standard contractual clauses" approved by the European Commission in its Implementing Decision as referred to in Article 46 of the GDPR or competent authorities in Europe (as applicable) with the data importer (you have a right to request a copy of these standard contractual clauses by contacting us using the contact details set out below in the "How to Contact Us" section).

Where applicable, we implement additional contractual, technical, and organizational measures to ensure that your personal information which is transferred outside of Europe is subject to an essentially equivalent level of protection.

Third-party organizations processing personal information for Workato must comply with applicable privacy laws and the approved transfer safeguards in order to protect your personal information in any country where they undertake processing.

8. Your Rights Over Your Personal Information.

In the European Economic Area and some other countries, you may have certain rights available to you under applicable data protection laws which may include the right to:

- Access: you have the right to request information about how we process your personal data and obtain a copy of that personal information.
- Rectification: you have the right to request the rectification of inaccurate personal information about you and for any incomplete personal information about you to be completed.
- Objection: you have the right to object to the processing of your personal information which is based on our legitimate interests (as described above).
- Erasure: you have the right to request the erasure of your personal information.
- Automated decision-making: you have the right not to have a decision made about you that is based solely on automated processing, including profiling if that decision produces legal effects about you or significantly affects you. Workato does not, as part of its recruitment process, make solely automated decisions about candidates.
- Restriction: you have the right to ask us to restrict our processing of your personal information, so that we no longer process that information until the restriction is lifted.
- Portability: you have the right to receive your personal information, which you have provided to us, in a structured, commonly used and machine-readable format and to have that information transmitted to another controller in certain circumstances.

Additional information for applicants in the European Economic Area:

You retain the right to lodge a complaint with a supervisory authority if you believe that Workato has infringed your rights under applicable data protection legislation. If you wish to exercise any of your rights or if you have any questions about these rights, please contact privacy@workato.com.

9. Additional information for California Residents.

Workato is committed to compliance with the California Privacy Rights Act. If you are a California resident, you have rights under the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2023 (CPRA), from hereinafter referred to as “CCPA”.

For purposes of this Privacy Notice: The term “personal information” means any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device. Personal information excludes:

- Publicly available information from government records
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as the following:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Categories of Third-Party Recipients of Personal Information

Personal Information Category	Category of Third-Party Recipients	
	Business Purpose Disclosures	Sales
A: Identifiers.	Applicant management systems, service providers such as background check, professional employer organizations, mail-management software, hosting partners and other business application partners	None
B: California Customer Records personal information categories.	Applicant management systems, service providers such as background check, professional employer organizations, mail-management software, hosting partners and other business application partners	None
C: Protected classification characteristics under California or federal law.	Applicant management systems, service providers such as background check, professional employer organizations, mail-management software, hosting	None

	partners and other business application partners	
D: Commercial information.	Applicant management systems, service providers such as background check, professional employer organizations, mail-management software, hosting partners and other business application partners	None
E: Biometric information.	N/A	None
F: Internet or other similar network activity.	Applicant management systems, service providers such as background check, professional employer organizations, mail-management software, hosting partners and other business application partners	None
G: Geolocation data.	N/A	N/A
H: Sensory data.	Visitors' presence on security systems at Workato's offices or recordings of your conversations with us, e.g. Zoom, Teams meetings, Google Meet.	None
I: Professional or employment-related information.	Applicant management systems, service providers such as background check, professional employer organizations, mail-management software, hosting partners and other business application partners	None
J: Non-public education information.	N/A	N/A
K: Inferences drawn from other personal information.	Applicant management systems, service providers such as background check, professional employer organizations, mail-management software, hosting partners and other business application partners	None

Your Rights and Choices

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.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, selling, or sharing that personal information.
- The categories of third parties with whom we disclose that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or shared (as those terms are defined in the CCPA) your personal information, or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales or sharing (as those terms are defined in the CCPA), identifying the categories of personal information sold or shared and the categories of third parties to whom personal information was sold or shared; and
 - disclosures for a business purpose, identifying the categories of personal information disclosed for a business purpose and the categories of persons to whom personal information was disclosed for a business purpose.

Deletion request rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your Rights to Know or Delete

You can exercise the rights described above, by sending an email to either privacy@workato.com or support@workato.com or calling +1-844-469-6752. You may exercise these rights by yourself or via an authorized agent who meets the agency requirements of CCPA. Once you exercise your rights, you agree to receive communication from us seeking information from you in order to verify your identity as the consumer from whom we have collected the personal information and such other information as reasonably required to enable us to fulfill your request. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify that you are the consumer from whom we collected the personal information, as well as sufficient details necessary to help us handle the request. You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

Note: The Sites do not respond to browser “Do Not Track” (DNT) signals and operates as described in this Privacy Notice whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Notice.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales and Sharing Opt-Out Rights

You have the right to direct us to not sell or share your personal information at any time. However, we do not sell or share (as those terms are defined in the CCPA) your personal information (and will not sell or share it without providing a right to opt-out).

Limiting Use and Disclosure of Sensitive Personal Information Rights

You have the right, at any time, to direct us to limit our use and disclosure of your sensitive personal information for purposes other than those authorized by the CCPA. However, we do not use or disclose your sensitive personal information for any purposes other than those authorized by the CCPA (and will not use or disclose it for any unauthorized purposes without providing a right to limit).

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information’s value and contain written terms that describe the program’s material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us by using the contact details under the "Contact Us" heading below.

10. Your responsibilities.

You are responsible for the information you provide to Workato and that it is honest, truthful, accurate and not misleading in any way. If you provide information concerning any other person such as individuals you provide as references, you are responsible for providing any notices and ensuring your referee consents to Workato collecting and processing that information as described in this Privacy Notice.

11. Changes to this Privacy Notice.

We will only use your personal information in the manner described in this Privacy Notice. However, we reserve the right to change the terms of this Privacy Notice at any time by posting revisions to our website. If at any time, we decide to use your personal information in a manner that is different from that stated at the time it was collected, you will be given notice.

12. Contact Us.

If you have questions regarding this Privacy Notice or about Workato's privacy practices, or to file any complaints, please send your inquiries to:

Workato, Inc.

Attention: Privacy Team

Address: 1530 Page Mill Road, Suite 100, Palo Alto, California 94304, United States

Email address: privacy@workato.com