

## Privacy Statement for Applicants

This Privacy Statement for Applicants (the “**Privacy Statement**”) sets out the basis on which Collibra and its affiliates (collectively “**Collibra**”, “**we**”, “**us**” and “**our**”) will Process the Personal Data of job applicants (the “**Applicants**”, “**you**”).

Please read this Privacy Statement carefully because it explains important information about the Processing of your Personal Data by Collibra, including your rights with respect to your Personal Data. We may amend this Privacy Statement at any time and advise you to consult this Privacy Statement on a regular basis to ensure you stay informed of any such amendments. If you are a California resident, please be sure to review the information provided in *Annex 1: California Applicant Privacy Notice*. If you are an EEA or UK resident, please be sure to review the information provided in *Annex 2: EEA/UK Applicant Privacy Notice*.

### 1. What is covered by this Privacy Statement?

This Privacy Statement applies to the Processing of Applicant Personal Data. For the purpose of this Privacy Statement, “**Personal Data**” or “**Personal Information**” has the meaning ascribed to it in applicable data protection law.

### 2. The Types of Personal Data We Collect

The Personal Data that an Applicant provides includes the following categories of information:

- Contact details, including name, mailing address, e-mail address and phone number;
- Information you provide in your CV or on an application form, including your education, professional and training history, and details of any other relevant skills, such as language capability;
- As appropriate, copies of certificates, diplomas or other documentation verifying the information you provide to us;
- Information captured as part of the application process, including interview notes, where permitted under applicable law and submitted by you, demographic data, and internal communications;
- Right to work information, i.e. information required to confirm your right to work in the country in which you will be employed, including as appropriate your nationality, national identity number and passport details; and
- Any other information you choose to share with Collibra, including in your CV or cover letter.

We may also collect information about Applicants from third parties, including:

- References from professional referees on request;
- Information provided to us by recruitment agencies or other referring parties;
- Information from third party talent prospecting services, such as publicly available information provided by SeekOut (SeekOut’s use of your data is subject to their [Privacy Notice](#)); and
- Information made publicly available by you via LinkedIn.

To the extent permitted by applicable law, Collibra may compile Personal Data about an Applicant obtained through a background check.

### 3. Why We Process Your Personal Data

Collibra Processes the Personal Data of Applicants to identify and hire talented individuals whose skills, experience and character align with Collibra’s vision, in particular, for:

- Negotiating and communicating with you in relation to your application;
- Reviewing your suitability for joining Collibra, seeking references and conducting any appropriate checks;
- Undertaking efficiency and recruitment efficacy analytics;

- Workforce planning;
- Candidate prospecting;
- Preventing illegal working;
- Carrying out equal opportunity monitoring; and
- Otherwise complying with applicable law.

#### **4. How We Disclose Your Personal Data**

Collibra may disclose the Personal Data of Applicants with:

- Other entities of Collibra's group for the purposes described above;
- Our vendors or other parties who provide products or services to us, such as the provider of our recruitment software;
- Public and governmental authorities; entities that regulate or have jurisdiction over Collibra such as regulatory authorities, public bodies, and judicial bodies, including, without limitation, to meet national security, law enforcement or securities requirements;
- Third parties in corporate transactions; in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the our business, assets or shares (including in connection with any bankruptcy or similar proceedings), or public company governance matters; and
- Otherwise with your consent.

#### **5. Security and Data Retention**

We maintain administrative, technical and physical safeguards designed to protect the Personal Data you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

Collibra stores all Applicants' Personal Data for as long as necessary to fulfill the purposes set out in the Privacy Statement, or for as long as we are required to do so by law or in order to comply with a regulatory obligation.

#### **6. How to Contact Us**

If you have any questions about this Privacy Policy or wish to exercise your rights, you may contact Collibra's Data Protection Officer at [privacy@collibra.com](mailto:privacy@collibra.com).

If you have any questions, comments or concerns about our processing activities, or you would like to exercise your privacy rights, please email us at [privacy@collibra.com](mailto:privacy@collibra.com) or write to us at:

Collibra Belgium BV  
Attn: Data Protection Officer  
Picardstraat 11 B 205,  
1000 Brussels  
Belgium

## Annex 1: California Applicant Privacy Notice

This California Applicant Privacy Notice applies to job applicants of Collibra residing in California from whom we collect Personal Information as a business under California law.

### 1. Personal Information Collection

The chart below provides the categories of Personal Information (as defined by the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA)) we collect from Applicants. The examples of Personal Information provided for each category reflect each category’s statutory definition and may not reflect all of the specific types of Personal Information associated with each category.

| Category   | We collect |
|--|------------|
| <p><b>A. Identifiers</b></p> <p><i>Examples:</i> 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.</p>   | Yes        |
| <p><b>B. Categories of Personal Information in Cal. Civ. Code Section 1798.80(e)</b></p> <p><i>Examples:</i> 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.</p>   | Yes        |
| <p><b>C. Characteristics of Protected Classifications under California or Federal Law</b></p> <p><i>Examples:</i> Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.</p>  | Yes        |
| <p><b>D. Commercial Information</b></p> <p><i>Examples:</i> Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>   | Yes        |
| <p><b>E. Biometric Information</b></p> <p><i>Examples:</i> Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p> | No         |
| <p><b>F. Internet or Other Electronic Network Activity Information</b></p> <p><i>Examples:</i> Browsing history, search history, and information regarding a consumer’s interaction with an internet website, application or advertisement.</p>  | No         |
| <p><b>G. Geolocation Data</b></p> <p><i>Examples:</i> Precise physical location.</p>   | No         |
| <p><b>H. Sensory Information</b></p> <p><i>Examples:</i> Audio, electronic, visual, thermal, olfactory, or similar information.</p>  | No         |
| <p><b>I. Professional or employment-related information</b></p>  | Yes        |

| Category  | We collect                             |
|---|--|
| <i>Examples:</i> Job application or resume information, past and current job history, and job performance information.  |  |
| <b>J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)</b><br><i>Examples:</i> Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution. | No                                     |
| <b>K. Inferences Drawn from Personal Information</b><br><i>Examples:</i> Consumer profiles reflecting a consumer’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.       | Yes, for diversity recruiting purposes |

## 2. Use of Personal Information

We collect and use your Personal Information in accordance with the specific business and commercial purposes described in Section 3 (Why We Process Your Personal Data) in the above Privacy Statement.

## 3. Your California Privacy Rights

Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected, sold, or disclosed by us; (2) purposes for which categories of Personal Information are collected or sold by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you during the past twelve months.

Right to Delete. Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected.

Right to correct inaccurate information. You may submit a verifiable request that we correct inaccurate Personal Information about you that we have collected.

Opt out of the “sale” or “share” of your personal information. We do not ‘sell’ or “share” our Applicant Personal Information as defined by the CCPA.

Limit the Use and Disclosure of Your Sensitive Personal Information. We only collect Applicant sensitive personal information which is necessary to evaluate candidacy. As such, limiting our use of your sensitive personal information would result in us not being able to evaluate your candidacy or employ you.

You may exercise the foregoing rights at any time by contacting us at [privacy@collibra.com](mailto:privacy@collibra.com).

Requests for access to or deletion of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations.

## Annex 2: EEA/UK Applicant Privacy Notice

Privacy in the European Union (“EU”) and, more broadly, the European Economic Area (“EEA”), is regulated by the General Data Protection Regulation (“GDPR”). In the United Kingdom (“UK”), privacy is regulated by the UK General Data Protection Regulation (“UK GDPR”). The laws of these jurisdictions provide EU and UK residents with certain privacy rights and govern an organization’s collection, processing, and disclosing of personal information.

### 1. EEA and UK Residents’ Rights

If you are located in the EEA or the UK you have the following rights:

- Right to be informed. You have the right to be informed about how your Personal Data is collected and processed.
- Right to access. You have the right to request copies of your Personal Data.
- Right to rectification. You have the right to request corrections with any information you believe is inaccurate.
- Right to erasure. You have the right to request the erasure of your Personal Data. Requesting erasure may result in us not being able to evaluate your candidacy as a job applicant.
- Right to restriction or objection of processing. You have the right to request that we restrict the processing of your Personal Data. When submitting an application for employment to us, you consent to our collection and processing data for the purposes stated in this Privacy Statement.
- Right to data portability. You have the right to request that we transfer the information that we have collected to another organization, or directly to you, under certain conditions.
- Right to withdraw consent. If we collect your information through an affirmative consent mechanism, you may withdraw it at any time. This may result in our inability to evaluate your candidacy or employ you
- Right to not be subject to a decision based solely on automated decision making. We do not envisage that you will be subject to decisions that will have a significant impact on you based solely on automated decision-making. We will notify you in writing if this position changes.

If you have questions, concerns, or complaints about our Privacy Statement, would like to report any security violations to us, or would like to exercise your privacy rights, please contact us via the following:

Collibra Belgium BV  
Attn: Data Protection Officer  
Picardstraat 11 B 205,  
1000 Brussels  
Belgium

[privacy@collibra.com](mailto:privacy@collibra.com)

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact your [local supervisory authority](#).

### 2. Legal Basis for EU/EEA/UK Personal Information Processing

We Process the Personal Data of Applicants on the basis of several legal justifications:

- For Contractually Necessary Purposes: Collibra and Applicants are working together with a view to potentially entering into an employment relationship. In order to evaluate an Applicant’s requested candidacy for employment, it is necessary for Collibra to process certain Applicant Personal Data. For successful Applicants, Collibra will make a formal offer of employment that will generally require the preparation of certain contractual terms.
- For our Legitimate Business Interests: Collibra has a legitimate interest in hiring talented people who will support our vision and play a key role in our success.
- To Fulfill a Legal Obligation: Certain laws and regulations may require Collibra to Process the Personal Data of Applicants in order to comply with our legal or regulatory obligations.

We may also use your Personal Data in the following situations, which are likely to be rare:

- Where it is necessary to protect your (or someone else's) vital interests (and, in the case of sensitive information, where you are incapable of consenting);
- Where it is necessary for us to defend, prosecute or make a claim against you, us or a third party; or
- In the case of sensitive information, where you have made the information public.

We may use your criminal conviction data only where it is appropriate (given your role) and we are legally able to do so.

### **3. Transferring your Personal Data**

We may transfer your Personal Data outside of the EEA or UK, to countries that do not offer an equivalent level of protection. Regardless of where your Personal Data is transferred, we will ensure that relevant safeguards are in place to afford your Personal Data adequate protection. Where your Personal Information is transferred from the EEA or UK to a country that has not received an adequacy decision under applicable law, such transfers will be subject to the Standard Contractual Clauses as set out at [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en#ntc12-L\\_2021199EN.01003701-E0012](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en#ntc12-L_2021199EN.01003701-E0012). Transfers from the UK will also be subject to the UK International Data Transfer Addendum (IDTA). Further details regarding the relevant safeguards can be obtained from us on request.

### **4. Status as a Data Controller**

Collibra Belgium BV, or one of its affiliates, is the data controller of your Personal Data and is responsible for how your Personal Data is processed.