

ARCTIC WOLF NETWORKS, INC.
JOB CANDIDATE PRIVACY NOTICE
(Last updated: February 2022)

This notice describes how **Arctic Wolf Networks, Inc.** or one of its affiliates (collectively, "**Company**" or "**we**"), as data controller, will collect, process and use the Personal Information you submit when applying for a position with Company or one of its affiliates through this website. In this notice, "**Personal Information**" or "**PI**" means any information relating to you, that identifies you, or could reasonably be used to identify you.

If you do not want your PI processed via the website as described in this notice, please do not submit any information or apply for a job through this website. You may alternatively contact us at the contact information provided below for further information on how to apply for a position. Of course, we will in any case need to collect certain PI from you in order to assess your application however it is submitted.

By submitting your CV/resume or other information through the careers page of <https://arcticwolf.com/company/careers/>, you acknowledge the information in this notice which supplements and qualifies our general website Privacy Policy and agree to the processing described herein.

WHAT PERSONAL INFORMATION WILL WE COLLECT AND USE

We will collect, process and use the following types of PI which you provide as part of your initial submission or otherwise make available to us as part of the application process:

- identification information, such as your name, date and place of birth, citizenship, passport data, social security or national insurance number;
- experience information, such as education and work experience, contact details of your former/current employer, information about your educational background, your work experience and other job related experience;
- other information you submit, such as the information you provide in an application form, CV or resume or public profile you share with us;

If your application progresses, we may also collect and process the following:

- information collected as part of the interview process, such as notes taken from your interview; and
- background check information, such as information obtained through reference checks, criminal background checks, subject to any further permissions or notifications required by applicable law.
- information required to initiate employment, such as proof of eligibility to work in country (like a passport or visa), tax information, bank account information, benefits eligibility information and other information you provide for the purposes of starting employment or performing an employment contract.

WHY WE COLLECT PERSONAL INFORMATION AND HOW WE USE IT

We will collect and use the PI you provide to process your application for employment and comply with statutory obligations we have in relation to your application, including confirming your eligibility to work in a given location. Your PI will be used and disclosed only for the legitimate business purposes of administering and evaluating your application and completing the on-boarding/new hire process, should you be offered and accept a position with the Company or one of its affiliates. We will use your PI for a variety of reasons linked to processing your application as set out below ("**Processing Purposes**"):

- administering and processing your application, including your identification, experience and other information you submit and, if your application progresses, any interview information and background check information;
- determining your suitability for the role for which you have applied, or for other roles, including your identification, experience and other information you submit and, if your application progresses, any interview information and background check information;
- conducting background checks as part of your application, subject to applicable law, including your identification, experience and other information you submit and, if your application progresses, any interview information and background check information;
- complying with applicable laws and employment-related requirements, including identification information and information required to initiate employment, for purposes such as confirming ability to legally work, setting up payroll, withholdings and benefits, and complying with statutory reporting requirements.

Please note that if you submit your resume/CV or other information and any other application materials to us, the above Processing Purposes may require sharing it with our affiliates, in particular, with the hiring entity which is offering the position.

SUBMITTING PERSONAL INFORMATION TO US

Resumes/CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held, relevant awards, and so forth). If you provide information about others (i.e., reference contact details), please first ensure you have informed them that you will be providing their information and that they are willing to provide it to us. Generally, we recommend that you do not disclose sensitive personal characteristics (e.g., gender, height, weight, religion, philosophical or political beliefs, financial data, age) in your resume/CV or any materials you submit in support of your application. **However, in positions in some locations, we may request that you self identify with certain characteristics, such as gender, race/ethnicity or veteran status. You may choose not to disclose such characteristics and choosing not to disclose will not subject you to any adverse treatment. If you do disclose, this information will be kept confidential and used for reporting and statistical purposes in compliance with applicable law.**

Any misleading, false or willful omission of relevant information may be sufficient reason for refusal of employment, or suspension or dismissal from employment. Please submit only accurate information.

WHO MAY HAVE ACCESS TO YOUR PERSONAL INFORMATION

Your PI may be shared with third parties, including the hiring entity or entities where hiring managers may be located for the Processing Purposes as follows:

- **to our group of companies**, as the specific entity you're applying to work for is part of a wider group with headquarters in the USA and offices in various jurisdictions which share human resources and management decisions, we may transfer your PI to the hiring entity in order to make the hiring decision and to other entities within the group to monitor and assure compliance with applicable policies and procedures and applicable laws;
- **to regulators, authorities and other third parties**, such as courts and other authorities, independent external advisers and internal compliance and investigation teams - as necessary for the Processing Purposes described above; and
- **to data processors**, as necessary for the Processing Purposes described above. These diligently selected data processors/service providers may carry out instructions relating to IT hosting services or similar functions, recruitment or workforce administration. Where required, they will be subject to contractual obligations to implement appropriate technical and organizational measures to safeguard the PI, and to process it only as instructed.

Therefore, for the Processing Purposes, your PI will be processed and stored on systems used by us in the USA and located in our headquarters in Eden Prairie, Minnesota USA and in other locations, as may be required from time to time. Such locations may be in countries that do not provide a level of data protection comparable to the level in your home country. However, if you are in Europe, and your PI is shared with other group entities, any such transfer outside the EEA, Switzerland, Andorra, Argentina, non-public organizations in Canada, Faeroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey and New Zealand (or any other country deemed "safe" by the European Commission) will be safeguarded by contractual measures based on the European Commission's approved standard contractual clauses. You can ask for a copy of these by contacting us as set out below.

Only authorized personnel (talent acquisition, human resources, legal, and appropriate managers) will have access to your PI for the legitimate business purposes described in this notice. We do not sell your Personal Information or share it for cross-context behavioral advertising.

OUR RECORD RETENTION PRACTICES

Company will retain PI no longer than is necessary to carry out the Processing Purposes described in this notice and/or as required by applicable law and Company procedures. We will delete your information when we no longer need it for the Processing Purposes. Any PI retained will be processed, used, disclosed, and stored in accordance with this notice. If you do not want your information retained in the event that you are not offered a position, you can request deletion by contacting us. However, we may retain some of your information for longer in an anonymized form for statistical purposes, including to meet statutory and regulatory requirements.

HOW WE SECURE YOUR PERSONAL INFORMATION

Company uses technology and practices to help ensure that your PI is protected from unauthorized access, use, misuse, modification, disclosure and destruction.

YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

Under applicable law, you may have certain rights in relation to your PI. These can differ by country. For instance, if you are in Europe, the EEA or Switzerland, your rights can be summarized in broad terms as follows:

(i) Right of access

You have the right to confirm with us whether your PI is processed, and if it is, to obtain a copy of that PI including the categories of PI processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

(ii) Right to rectification

You may have the right to rectify inaccurate or incomplete PI concerning you.

(iii) Right to erasure (right to be forgotten)

You may have the right to ask us to erase PI concerning you.

(iv) Right to restriction of processing

In limited circumstances, you may have the right to request that we restrict processing of your PI, however where we process your PI for the Processing Purposes we think that we have a legitimate interest in processing that PI which may override a request that you make.

(v) Right to data portability

You may have the right to receive PI concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that PI to another entity.

(vi) Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your PI, including profiling, by us and we can be required to no longer process your PI. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

You also have the right to lodge a complaint with the competent data protection supervisory authority in your jurisdiction.

If you'd like to exercise any of these rights, please get in touch via the details listed below.

Company's online Privacy Policy can be found [here](#).

CONTACTING US

If you have questions about this notice, our privacy practices or the PI we collect about you, or have requests related to such PI, request at [Data Protection](#) or write to:

Arctic Wolf Networks, Inc.
Attn: Legal Department
P.O. Box 46390
Eden Prairie, MN 55344 U.S.A.

Pursuant to Article 27 of the UK GDPR, Arctic Wolf Networks, Inc., Arctic Wolf Networks Germany GmbH, and Arctic Wolf Networks Canada, Inc. have appointed EDPO UK Ltd as its GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO's online request form: <https://edpo.com/uk-gdpr-data-request/>
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

Pursuant to Article 27 of the General Data Protection Regulation (GDPR), Arctic Wolf Networks UK LTD has appointed European Data Protection Office (EDPO) as its GDPR Representative in the EU. You can contact EDPO regarding matters pertaining to the EU GDPR:

- by using EDPO's online request form: <https://edpo.com/gdpr-data-request/>
- by writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium

Pursuant to Article 27 of the EU GDPR, Arctic Wolf Networks, Inc. and Arctic Wolf Networks Canada, Inc. have appointed IITR Cert GmbH as its GDPR representative in the EU. You can contact IITR Cert GmbH regarding matters pertaining to the EU GDPR:

- by writing to IITR Cert GmbH, Dr. Sebastian Kraska, Data Protection Representative, Eschenrieder Str 62c, 82194 Groebenzell, Germany
- by email to email@iitr.de

Pursuant to Article 27 of the EU GDPR, Arctic Wolf Networks Germany GmbH has appointed IITR Cert GmbH as its GDPR DPO in the EU. You can contact IITR Cert GmbH regarding matters pertaining to the EU GDPR:

- by writing to IITR Cert GmbH, Dr. Sebastian Kraska, Data Protection Representative, Eschenrieder Str 62c, 82194 Groebenzell, Germany
- by email to email@iitr.de