

# Applicant Privacy Statement

## How Seagate Receives Your Information

Seagate Technology LLC or an affiliate controlled by, under common control with, or controlling Seagate Technology LLC, including but not limited to affiliates operating under the LaCie name or brand (collectively, "Seagate", "we", "us", "our") collects information about you that you provide directly through this Careers website ("Website") or that is received indirectly using a Seagate or any third party application or service in connection with your application for employment with Seagate, for example mobile applications or recruiting CRM ("Applications"). Seagate collects, uses, and processes this information for purposes stated below in this Applicant Privacy Statement ("Statement"). Information submitted elsewhere on Seagate's websites will be used in accordance with our general online [Privacy Statement](#).

## Personal Information

### Personal Information You Provide

Personal information means information that you provide or Seagate collects in any form that relates to you, identifies you, or relates to an identifiable individual. We may collect personal information from you, such as your name, e-mail address, postal address and telephone number, details of your current and prior employment history, work performance, education, and training. We may retain a record of your correspondence with us, interests, and any other information about you included in a submitted profile or resume.

In certain cases, depending on your geographic location, we may ask questions about race/ethnic origin, gender, age, and disability of our applicants, for monitoring equal opportunity. We may also inquire about criminal conviction history through our background check process. We will do so only where permitted by applicable law. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, except where such information is legally required.

Sensitive information includes information related to government identification, race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings, or any other information which may affect you in the same manner prescribed under applicable law.

Any information you submit through the Website or Applications must be true, complete, and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights. If you provide us with personal information of a third party (such as a reference or any other individual as part of your application, including information of your

family members) it is your responsibility to notify those other individuals of the details of this Statement, including relying on applicable legal basis or obtaining any required consent (where consent is required) from that individual prior to providing the information to us. You must also ensure that we can lawfully collect, use, or disclose those individuals' personal information as set out in this Statement. We may allow you to share information with third party social media sites, or use social media sites or other sites to create or connect to your account (e.g. LinkedIn). Those social media sites may give us access to certain personal information stored by them (e.g., content viewed and information about the advertisements within the content you have been shown or may have clicked on, etc.) from your interaction with the online services. You may control the personal information you allow us to have access to through the privacy settings on that third party site and the permissions you give us when you grant us access.

## Personal Information from Other Sources

For the purpose of background check reports in connection with your application, and as permitted by applicable law, Seagate obtains information about you from other sources, including:

- Your references;
- Prior employers;
- Educational institutions you attended;
- **US only:** Social Security Administration (SSN verification), Department of Motor Vehicles (DMV Report for those in driving positions), and Office of Foreign Asset Control (OFAC Search);
- Other publicly available information.

## Use of Personal Information

### Purpose of Collection and Processing

We collect and process personal information about you for one or more of these reasons:

- a) Because you voluntarily provide this information and consent for us to process it;
- b) Because this information is necessary to take steps at your request prior to entering into an employment relationship or internship;
- c) Because this information is of particular importance to us and we have a specific legitimate interest under law to process it;
- d) To comply with a legal obligation; or
- e) Where necessary to protect the vital interests of any person.

Where the collection or processing is based on your consent, you may withdraw your consent at any time to the extent permitted by applicable law.

Seagate may use personal information for its global personnel recruitment, management, and planning purposes, as permitted by applicable law:

- To communicate with you about career opportunities, recruitment, and talent acquisition. We will engage in these activities to manage our prospective contractual relationship with you.

- To send you job alerts, information about Seagate, and information regarding the Website, Applications, and changes to our terms and policies. We will engage in these activities to manage our prospective contractual relationship with you.
- To process your application, create your account, and consider you for an opportunity. We will engage in these activities to manage our prospective contractual relationship with you, based on our legitimate interests.
- To conduct reference checks, and to conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or based on our legitimate interests.
- To assist in managing our relationship with you and perform administration or operational functions and analysis. We will engage in these activities to manage our prospective contractual relationship with you, based on our legitimate interests.

Seagate may also use the information to prevent potentially illegal activities and activities that are detrimental to you or other users, in order to comply with a legal obligation, or based on our legitimate interests

The information about you will be added to Seagate's international candidate database and can be retained and used to consider you for opportunities at Seagate other than the one(s) for which you apply. If you do not wish us to do this, please contact us in accordance with the "Contact Us" section below.

If we hire you, personal information we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes. In some instances, we may offer a select group of individuals an equity grant. We will request your consent to process your information for this purpose.

Providing personal information to us through the Website and Applications is voluntary. Do not upload or submit your resume or other information, including sensitive information, if you do not want your personal information processed via our Website or Applications. However, if you do not provide sufficient information, Seagate may be unable to consider your employment application or, if you are hired, Seagate may be unable to consider your subsequent promotion, transfer, or relocation, or may be prevented from complying with the applicable legal obligations. Contact Seagate in accordance with the 'Contact Us' section below or follow the instructions provided in email to change your preferences or delete your information.

## DocuSign

Within some jurisdictions, Seagate may use the DocuSign application ('DocuSign') to enable contracts and notices to be signed and provided electronically. In using this tool, you may be required provide limited personal information (such as your name, email address and electronic signature) to Seagate and DocuSign for the purposes of executing your employment contract and/or other documents with Seagate. This personal information will be held by Seagate only for as long as necessary to execute the contract or fulfill any other legitimate business interest related to the signed matter. We encourage you to review DocuSign's privacy practices, which are located [here](#).

DocuSign is an optional feature, which you are not required to consent to use. If you decide to withdraw consent or refuse to provide consent, you may print a pdf copy of your employment document(s) to be signed and returned to Seagate. Please contact your recruiter or [data.protection.officer@seagate.com](mailto:data.protection.officer@seagate.com) if you have any questions or concerns using DocuSign.

## Information Sharing

Seagate may disclose and transfer personal information to its departments and affiliated companies in connection with the above purposes.

We will limit access to personal information to personnel with a business need to know the information for the purposes described in this Statement, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying.

Seagate may also disclose and transfer personal information to third parties that offer services or otherwise assist with the above purposes, for example, when conducting a background investigation or processing tax filings. Seagate will establish that such parties process your personal information in accordance with Seagate's instructions or with an adequate level of protection for such data.

## Transfer of Information

Seagate may transfer personal information to its departments, affiliated companies, and third parties outside of your country of residence, and some of these recipients may be located in another country where they may not have adequate data protection standards similar to your country of residence. For example, we may host this Website and Applications on servers in the United States. Personal information will be available for use, review, and transfer within the United States and other countries where we or our service providers have operations, for the purposes stated. When we transfer your personal information outside your country of residence, we may put in place appropriate safeguards in accordance with our legal obligations to ensure that your personal information is adequately protected irrespective of the country to which it is transferred.

If you are located in the European Economic Area (the "EEA"), this transfer may include countries outside of the EEA. Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available [here](#)). For transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your information. Employees in the EEA may obtain a copy of these measures by contacting us in accordance with the 'Contact Us' section below.

Seagate will not sell or share your personal information for third-party marketing purposes. Seagate reserves the right to disclose personal information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To cooperate with law enforcement officials and government authorities or where

required by law. This can include officials, authorities, and laws outside your country of residence.

- In connection with the sale or transfer of all or a portion of the business, as well as any reorganization, merger, joint venture, assignment, or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- For other legal reasons such as enforcing our terms and conditions, and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

## Choice and Access

If you register on the Website, you may access, review, and change your personal information stored therein by logging into the Website and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change personal information that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your personal information if it changes or is inaccurate.

You may, where permitted by applicable law, request to review, access, correct, update, or delete your personal information, as well as restrict, suppress, or object to the processing of it. You may also request that we cease using your personal information as permitted by applicable law, request a copy or portability of your personal information, or lodge a complaint with a competent authority. We will respond to your request consistent with applicable law. We may decline to process requests where permitted by applicable law. Please contact Seagate as indicated below in the 'Contact Us' section or follow the removal instructions in the communications that you receive if you wish to exercise such rights, but note that if you object to the processing of your personal information, or ask Seagate to delete your personal information, Seagate may not be able to send you information about employment opportunities.

We ask individual users to identify themselves and the information requested to be changed or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical or for which access is not otherwise required. Please note that certain personal information may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

## Data Retention

We will retain personal information for the period necessary to fulfill the purposes outlined in this Statement unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are: (i) the duration of the application process; (ii) as long as we have an ongoing relationship or the possibility of an employment relationship with you; and (iii) as required or limited by law; and (iv) as advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

We may remove personal information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, Seagate can delete personal information about you (including your CV/résumé) from our database at any time and without providing any

reason.

Therefore, please retain your own copy of the personal information provided to us.

## Passive Information Collection

**Cookies and Similar Technologies.** We and our service providers use “cookies” and similar technologies on the Website. Please see our [Cookie Statement](#) for more information.

### Google Analytics

Our Sites use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the services and report on activities and trends. If you are a registered user of our Sites and/or Offerings, we may use this information, in combination with other information that you provide, to improve the services and other offerings of the program or website. This service may also collect information regarding the use of other websites, apps, and online resources. You can learn about Google’s practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and may opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

## Keeping Your Information Secure

Seagate maintains reasonable security measures to protect personal information, including sensitive personal information, from unauthorized access or review. However, no method of transmission over the Internet, or method of electronic storage, is ever 100% secure. We strongly advise you not to upload or otherwise communicate any sensitive or confidential information on this Website or any Application.

Seagate hereby disclaims, as far as permitted by local laws, any liability for itself and contractors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed, or not delivered in a timely fashion to our Website or Applications.

## Links to Third-Party Websites and Third-Party Frames

This Statement does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Website or Applications link (e.g. Workday, LinkedIn). The inclusion of a link on the Website or Application does not imply endorsement of the linked site or service by Seagate.

## Law Applicable to Job Application

The Website and Applications allow you to apply for jobs world-wide, as a benefit of Seagate’s centralized global recruitment function. The Website and Applications are operated from the United States. Accordingly, any personal information you submit to the Website or Applications will be collected in the United States and will be subject to U.S. laws. However, if we share your personal information with an affiliate located in another country in its capacity as a potential

employer, the affiliate will handle your personal information in accordance with this Statement. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

## About Children

The Website and Applications are not intended for individuals under the age of majority in their jurisdiction.

## Current Personnel of Seagate

If you currently work for Seagate or one of our affiliates, you must be eligible to apply for a different position within Seagate to use the Website or Applications. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs, and HR policies applicable to that position. The Website and Applications are not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

## Contact Us

If you require assistance to change or update your personal information, or if you have questions or requests, please contact Seagate at [seatalent.dataprivacy@seagate.com](mailto:seatalent.dataprivacy@seagate.com), or contact us by post to provide the updated or changed information, at:

**Seagate Technology LLC**  
47488 Kato Road  
Fremont, CA 94538  
USA  
Attention: HR Central US - Data Privacy

## Additional Information for the EEA

If you reside in the EEA, you also may:

Contact our data protection officer (DPO) responsible for your country or region, if applicable.

Email us at [data.protection.officer@seagate.com](mailto:data.protection.officer@seagate.com) or write to us at:

**Seagate Technology LLC**  
Attn: Legal Department – Privacy  
47488 Kato Road  
Fremont, CA 94538  
USA

In Germany, contact Data Protection

Officer: Dr. Sebastian Kraska  
IITR GmbH  
Marienplatz 2  
80331 München  
<http://www.iitr.de>

Lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct.

## Additional Information for Thailand

Please find additional information regarding your rights and our collection, use, and disclosure of your personal information below.

The personal information collected by us may also include date of birth, national ID number/passport number, details of your education (e.g., a copy of transcripts and student ID number), and your employment and financial details (e.g., a copy of first and last pay slips or tax forms and employee ID number).

For the purpose of background check reports in connection with your application, and as permitted by applicable law, Seagate obtains information about you from other sources, including:

- Your references;
- Prior employers;
- Educational institutions you attended;
- Government authorities (e.g., Thai Royal Police);
- Other publicly available information.

The Website and Applications are not intended for individuals under the age of twenty (20).

If you have any questions or concerns about this Statement or would like to contact us or exercise your rights, please contact us at [data.protection.officer@seagate.com](mailto:data.protection.officer@seagate.com) or at:

Seagate Technology (Thailand) Limited  
1627 Moo 7, Teparuk Road  
Tambol Teparuk, Amphur Muang Samutprakarn 10270  
Thailand

## Changes to this Privacy Statement

Seagate may amend this Privacy Statement at any time. If Seagate is going to use personal



information collected through this Website or any Application in a manner materially different from that stated at the time of collection, Seagate will notify users via email and/or by posting a notice on the Website prior to such use or by other means as required by law. Where applicable and required by applicable law, we may ask for your consent for any change for which your consent is needed. The “Last Updated” legend at the bottom of this Statement indicates when this Statement was last revised. Any changes will become effective when we post the revised Statement on this Website.

Last updated: 8 May 2020