

JOB APPLICANT PRIVACY NOTICE

Last Updated: June 3, 2025

PLEASE READ THIS NOTICE CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD.

INTRODUCTION

Sirsi Corporation, dba SirsiDynix, is committed to protecting the privacy and security of your personal information. We also believe in transparency, and this Policy explains how we treat your personal data when you apply for a job with us or one of our affiliates. Please read this Policy carefully to learn more about how we process personal information and what rights you may have under applicable law.

When does this Notice apply? This Notice describes our practices regarding the personal information we receive, collect, use, share, and otherwise process in connection with your application for employment and our hiring process. This Notice does not form part of any contract of employment. Our contact information is provided at the end of this Notice. We act as the “data controller” with respect to the information described in this Notice. For information about how we process personal information in other contexts, please see our which is available at <https://www.sirsidynix.com/privacy/>. This Notice Supplements the [Privacy Policy](#).

HOW WE PROCESS PERSONAL INFORMATION

What personal information do we collect? We collect and process the following personal information for the purposes described in the table below and in the “*Additional HR Processing Activities*” section below. For residents of California, pursuant to the California Consumer Privacy Act, as amended (“CCPA”), we have identified the categories of personal information collected in addition to the purposes described below.

Category	Description
Contact Information and Communications	<p>We collect your full name, address, telephone number, email address, and any other contact information that you provide to us. We will also receive and process your communications, including emails, with us.</p> <p>We process Contact Information and Communications to communicate with you, to perform our relationship with you, and as described in the “<i>Additional HR Processing Activities</i>” section below. The legal basis for this processing is, as described in more detail below, carrying out our legitimate interests and our legal obligations, and, where applicable, performing or entering our contract with you.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data</p>
Education and Professional Experience Data	<p>You may share your résumé or Curriculum Vitae (CV) with us, which may contain information regarding your educational history, work history, professional experience, competencies, certifications, and skills. You may also share information in your qualifications for the requirements of your role.</p> <p>We process Education and Professional Experience Data to assess and document your qualifications for the requirements of the role for which you applied, and as</p>

	<p>described in the “<i>Additional HR Processing Activities</i>” section below. The legal basis for this processing is, as described in more detail below, carrying out our legitimate interests and our legal obligations, and, where applicable, taking steps to enter into a contract or relationship with you.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Professional or Employment-related Information; Education Information</p>
Background Check	<p>During the assessment or on-boarding process or when otherwise permitted by law, we collect information from you in the form of official documentation (such as your government-issued identification, passport, or other right to work evidence) and from third parties (references provided by you, former employers, and criminal background check agencies, to the fullest extent permitted by law). This may include public information gathered from social media. For example, when permitted under local law, we may ask you to provide an extract of your criminal record. Background Check information may only be used by us for recruitment or human resources purposes for a limited period of time.</p> <p>We process Background Check information for background screening and vetting, to carry out our obligations under applicable law, and as described in the “<i>Additional HR Processing Activities</i>” section below. The legal basis for this processing is, as described in more detail below, carrying out our legitimate interests and our legal obligations, and, where applicable, taking steps to enter into a contract or relationship with you. However, where required by law, we will obtain your consent.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data; Audio, Electronic, Visual, thermal, or Similar Information; Professional or Employment-related Information; Education Information; Biometric Information; Sensitive Information</p>
Sensitive Information	<p>We may, with your specific consent, process certain sensitive personal information and/or “special categories” of sensitive personal information, such as your social security number, identification card (e.g., driver’s license, state ID card, passport), data revealing racial or ethnic origin, trade union membership, biometric data for security controls, and data concerning health and safety, (e.g., incident reports, workers’ compensation claims, leave requests, and requests for accommodations).</p> <p>We process the Sensitive Information to carry out our obligations under applicable law, for the performance of the employment relationship, or as applicable law otherwise permits, as described in the “<i>Additional HR Processing Activities</i>” section below.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Biometric Information; Inferences; Sensitive Information</p>
Travel and Educational Expenses Reimbursement	<p>When you seek reimbursement for hiring-related travel or education or other expenses, we may ask you to complete a form to facilitate reimbursement of any travel expenses you incurred, in accordance with our reimbursement policies. This information may identify your location and other activities, including how much was spent, when, and why.</p> <p>We process Travel and Educational Expenses Reimbursement information to facilitate reimbursements, to prevent fraudulent payments, and as described in the “<i>Additional HR Processing Activities</i>” section below. The legal basis for this</p>

	<p>processing is, as described in more detail below, carrying out our legitimate interests and our legal obligations, and, where applicable, taking steps to enter into a contract or relationship with you.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data; Commercial Information</p>
Verification of Identity and Right to Work	<p>At various times, we may ask you to provide your full name, date of birth, residential address, government identification number, and a copy of your government-issued photo identification/passport.</p> <p>We process this information to confirm your identity and your entitlement to work in the applicable country, to carry out our obligations under applicable law, and as described in the “<i>Additional HR Processing Activities</i>” section below. The legal basis for this processing is, as described in more detail below, carrying out our legitimate interests and our legal obligations, and, where applicable, taking steps to enter into a contract or relationship with you.</p> <p><i>CCPA Categories:</i> Identifiers; Categories Described in the Customer Records Statute; Geolocation Data; of Sensitive Information</p>
<p><i>*Note:</i> The above list contains examples of personal and sensitive information we may have about you and it does not guarantee that we currently hold or have ever held this information about you.</p>	

Additional HR Processing Activities. In addition to the specific processing activities described above, we also process your personal information for the following purposes:

- **Personnel and Human Resources Management.** This includes, for example, ordinary business practices related to the establishment, maintenance, and termination of relationships; personnel management and administration (including before, during, and after your employment with us); business management and planning; administering benefits; conducting performance reviews and disciplinary proceedings; processing employee work-related claims (for example, insurance and worker's compensation claims); and addressing labor relations issues.
- **Operations Management.** This includes, for example, the establishment, performance, and management of our business activities (such as maintaining internal networks and IT systems); operation, evaluation, and improvement of our recruiting system; accounting and auditing; obtaining or maintaining insurance coverage; managing risks; or obtaining professional advice.
- **Security Management.** This includes, for example, ensuring the security of our premises and information held by the company as well as the safety of our personnel; preventing fraud; and network and information security.
- **Legal and Regulatory Compliance.** This includes, for example, obtaining and releasing personal information as required by law (e.g., tax, health and safety, anti-discrimination laws) or judicial authorization; maintaining records that can include personal information, such as government identifiers, information relating to sickness, maternity or parental leave, pension and retirement; and establishing, exercising, or defending legal claims, whether in court, administrative, or other proceedings.
- **Anonymous Data.** Under some circumstances we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. We will process such data only in a de-identified fashion and will not attempt to re-identify such data.

- **Consistent Purposes.** We may also process the information described above for purposes that are consistent with, related to, and/or ancillary to the purposes and uses described in this Notice for which your personal information was provided to us.

How will we disclose your information? We may share each of the categories of personal information described above in the following contexts. We will only disclose your personal information where, when required by law, the recipient has provided written assurances that it will protect any personal information disclosed to it in accordance with applicable law.

- **Internally.** Your information may be shared internally for human resources purposes. This includes members of our Human Resources teams, managers in relevant business areas, and IT staff (if access to the data is necessary for the performance of their roles).
- **Affiliates.** If you apply for a position with one of our parents, subsidiaries, or affiliates, SirsiDynix will share your information with that business. SirsiDynix's corporate Human Resources teams manage the hiring and on-boarding process.
- **Attorneys and Advisors.** We may disclose your information to our legal counsel and other advisors to obtain guidance, advice, and counsel related to your employment. We may also disclose your information to our legal counsel in the event of a complaint or litigation.
- **Agents and Contractors.** Your data will be shared with third party agents and contractors that supply services to us which require the processing of that personal information, such as recruiting and payroll services. You may also interact with individuals who are independent contractors of the company, and they will receive the information you share with them.
- **Legal Obligations and Rights.** We may disclose your personal information in response to subpoenas, warrants, court orders, or other legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our legal rights; to defend against a legal claim; and to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property (such as by providing your health information to a doctor in a medical emergency), or a violation of employment policies or agreements.
- **Acquisitions and Similar Transactions.** We may disclose information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.

Lawful Basis of Processing. We process your personal information for the following purposes related to your employment relationship with us:

- **To Carry Out Our Legitimate Interests.** Processing is necessary for the purposes of our pursuit of our legitimate interests in managing your employment or potential employment, in our ongoing assessment and verification of your suitability for working with us, and in keeping records of your relationship with us. We also have a legitimate interest in processing data to deal with complaints, claims, and lawsuits made against us.
- **To Carry Out Our Legal Obligations and Perform a Contract.** Processing is necessary for our compliance with our legal obligations in the field of employment law, such as taking steps to enter an employment relationship with us, the performance of any employment relationship with us, and our performance of any employment agreement.
- **With Your Consent as provided in this Notice.** If we ask you to review and sign this Notice to obtain your express consent to the processing of your personal information for certain types of purposes identified in this Notice, and you do so, we will process your personal information in accordance with the Notice and your express consent, which you keep a right to withdraw at any point in time.

How do we collect this data? We collect information from you in a variety of ways, including directly from you (in writing, verbally, or electronically), in conversations, in reviews and evaluations, in interviews and your application, and through the use of office computer and telephony equipment. We may also collect information from third parties, including your former employers, credit reference agencies, background check providers, or publicly available resources (such as social media networks).

What if you do not provide personal data? You may object to our collection of data requested during your employment with us. However, if you do not provide the information, we may not be able to perform certain activities necessary to process your application for employment, maintain your employment, or comply with legal obligations.

YOUR RIGHTS AND CHOICES

Depending on where you reside, you may have certain rights regarding your personal information. Please contact Human Resources if you wish to exercise or learn more about your rights under applicable law.

European Union, European Economic Area, and the United Kingdom

- **Right of Access.** You have the right to receive confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; and the recipients or categories of recipient to whom the personal data have been or will be disclosed. We will provide a copy of your personal information in compliance with applicable law.
- **Right of Rectification.** Our goal is to keep your personal information accurate, current, and complete. Please contact Human Resources if you believe your information is not accurate or if it changes.
- **Right to Erasure.** In some cases, you have a legal right to request that we delete your personal information when (1) it is no longer necessary for the purposes for which it was collected; (2) consent has been withdrawn in certain instances; (3) you have objected to the processing in certain instances; (4) the personal information has been unlawfully processed; (5) the personal information has to be erased for compliance with a legal obligation; or (6) the personal information was collected in relation to the offer of information society services. However, the right is not absolute. When we delete personal information, it will be removed from our active servers and databases; but, it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, resolve disputes, or enforce any agreements.
- **Right to Restrict Processing.** You have the right to restrict the processing of your data when (1) the accuracy of the personal data is contested, for a period enabling the controller to verify the accuracy of the personal data; (2) the processing is unlawful and you oppose erasure and request a restriction instead; (3) we no longer need the personal data, but you need us to keep it for the establishment, exercise, or defense of legal claims; or (4) you have objected to us processing the personal information, pending resolution of the objection.
- **Right to Object.** In certain circumstances, you have the right to object to the processing of your personal information where the processing is necessary for performance of a task carried out in the public interest, for our legitimate interests, or for the legitimate interests of others. You also have the right to object where personal data are processed for direct marketing purposes or for scientific or historical research purposes or statistical purposes.
- **Right to Withdraw Consent.** If you have provided your consent to the collection, processing, and transfer of your personal information, you may have the right to fully or partially withdraw your consent. Once we have received notice that you have withdrawn your consent, in whole or in part,

we will no longer process your information for the purpose(s) to which you originally consented and have since withdrawn unless there are compelling legitimate grounds for further processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims. To withdraw your consent, please contact Human Resources using the contact information provided below.

- **Right to Complain.** If you believe we have not processed your personal information in accordance with applicable law, we encourage you to contact us at legal@sirsidynix.com. You may also have the right to make a complaint to an applicable Supervisory Authority or seek a remedy through the courts. A list of Supervisory Authorities for residents of the EU or EEA is available at: https://edpb.europa.eu/about-edpb/board/members_en. UK residents may contact the UK Supervisory Authority here: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>. If you need further assistance regarding your rights, please contact Human Resources using the contact information provided below, and we will consider your request in accordance with applicable law.

California

California residents can learn more about your rights under the CCPA below. All terms used in this section shall have the meanings given in the CCPA, when applicable.

CCPA Notice at Collection. We collect and process personal information as described in the “*How We Process Personal Information*” section of this Notice. The relevant CCPA categories for this information are indicated above. We may provide a separate notice at collection if we collect additional information or intend to use information for additional purposes. This Notice relates to personal information we may collect and process in the course of your application for employment with us. Please see our Privacy Policy, which is available at <https://www.sirsidynix.com/privacy/>, for more information regarding our privacy practices.

Data Practices During the Last 12 Months. For information about our data practices during the last 12 months, please see our Privacy Policy, which is available at <https://www.sirsidynix.com/privacy/>.

No Financial Incentive. We do not offer financial incentives or any price or service difference in exchange for the retention or sale of your personal information.

No Personal Information Sold or Shared: We have not sold or shared categories of personal information during the preceding 12 months.

Limited Use of Sensitive Information. We only use or disclose sensitive personal information for purposes permitted by the CCPA and to which the right to limit does not apply.

Individual Rights. California residents have the rights described below. However, these rights do not apply in all instances and are subject to certain exceptions as a matter of law.

- **Right to Know.** You have the right to request: (1) the specific pieces of personal information we have collected about you; (2) the categories of personal information we have collected about you; (3) the categories of sources from which the personal information is collected; (4) the categories of personal information about you that we have sold or shared and the categories of third parties to whom the personal information was sold or shared; (5) the categories of personal information about you that we disclosed for a business purpose and the categories of third parties to whom the personal information was disclosed for a business purpose; (6) the business or commercial purpose for collecting, disclosing, selling, or sharing personal information; and (7) the categories

of third parties to whom we disclose personal information. Our response will cover the 12-month period preceding our receipt of a verifiable request unless a longer period is requested by you.

- Right to Delete. You have a right to request the erasure/deletion of certain personal information collected or maintained by us. As described herein, we will delete your personal information from our records and, as applicable, direct any service providers (as defined under applicable law) to delete your personal information from their records. However, we are not required to honor a deletion request if an exemption applies under the law.
- Right to Correct. You have a right to correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes for which we process the personal information. We will use commercially reasonable efforts to correct the inaccurate personal information as directed by you.
- Right to Limit Use and Disclosure. You have the right to limit our use and disclosure of your sensitive personal information to that use which is necessary to perform our services and provide our goods as requested by you, or as otherwise permitted by law. We only use or disclose sensitive personal information for purposes permitted by the CCPA and to which the right to limit does not apply.
- Right to Opt-Out. You have the right to direct us to stop selling or sharing your personal information to third parties and to refrain from doing so in the future. For purposes of the CCPA in the context of our employment or contractual relationship, we do not sell or share personal information as defined under applicable law.

Submission Process. You may submit a request to exercise one of the above rights via a toll-free telephone call to 800-288-8020 or by email to legal@sirsidynix.com. If a request is submitted in an incorrect manner or if it is deficient, we will either (1) treat the request as if it had been submitted via the designated manner, or (2) provide you with specific directions on how to submit the request or remedy any deficiencies, as applicable.

Verification Process. We are required to verify the identities of those who submit requests to exercise the above rights. To determine whether the individual making the request is the consumer about whom we have collected information, we will verify your identity by matching the identifying information provided by you in the request to the personal information that we already maintain about you. As a part of this process, you will be required to provide your name, address, and telephone number. We will inform you if we cannot verify your identity.

- If we cannot verify the identity of the person making a request for categories of personal information, we may deny the request. If the request is denied in whole or in part for this reason, we will provide a copy of, or direct you to, our privacy policy.
- If we cannot verify the identity of the person making the request for specific pieces of personal information, we are prohibited from disclosing any specific pieces of personal information to the requestor. However, if denied in whole or in part for this reason, we will evaluate the request as if it is seeking the disclosure of categories of personal information about the consumer.
- If we cannot verify the identity of the person making a request to delete, we may deny the request.
- If there is no reasonable method by which we can verify the identity of the requestor to the degree of certainty required, we will state this in our response and explain why we have no reasonable method by which we can verify the identity of the requestor. In such cases we may not be required to comply with the request or may request additional information reasonably necessary to verify the request.

Authorized Agents. Authorized agents may submit requests via the methods identified in this Policy. If you use an authorized agent to submit a request to know or a request to delete, we may require: (1) the authorized agent to provide proof that you gave the agent signed permission to submit the request; (2) you to verify your identity directly with us; and (3) you to directly confirm with us that you provided the authorized agent permission to submit the request. However, we will not require these actions if you have provided the authorized agent with power of attorney pursuant to the California Probate Code.

Excessive Requests. If requests from a consumer are manifestly unfounded or excessive, in particular because of their repetitive character, we may either (1) charge a reasonable fee, or (2) refuse to act on the request and notify the consumer of the reason for refusing the request. If we charge a fee, the amount will be based upon the administrative costs of providing the information or communication or taking the action requested.

Non-Discrimination. You have the right not to receive discriminatory treatment by us due to your exercise of the above rights. We do not offer financial incentives and price or service differences, and we do not discriminate against employees, applicants, or independent contractors for exercising their rights under applicable law.

OTHER IMPORTANT INFORMATION

International Data Transfer. We have operations in the United States, and personal information will be transferred to, stored, and processed in the United States and other countries in which we or our affiliates, partners, service providers, or agents maintain facilities. These countries may not offer the levels of protection required in your home country. The transfer is necessary for the performance of your relationship with us. By sending us personal information, you understand that your personal information is subject to collection, storage, processing, and transfer to the United States and those third parties with whom we share it as described in this Notice. We rely on recognized legal bases to lawfully conduct cross-border/international transfers of personal information, such as express consent, when transfer is necessary for us to deliver services pursuant to an agreement, or when the transfer is subject to safeguards that assure the protection of the personal information. For more information, please see our Privacy Policy, which is available at <https://www.sirsidynix.com/privacy/>.

How long do we store and use your information? We will retain and use your personal information as needed to fulfill the purposes for which it was collected, and this will depend on your employment status with us. We will retain and use your personal information as long as necessary to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

When we no longer have a purpose to retain your personal information, we will securely destroy your personal information in accordance with applicable law and our policies. Where required by law, we take reasonable steps to delete the personal information we collect if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We are required by law to maintain records of consumer requests submitted under the CCPA and how we responded to such requests for at least 24 months. We only use this information for recordkeeping purposes. For more information, please contact Human Resources via the contact information provided below.

How do we protect your information? We have put security measures in place to protect personal information from being accidentally lost, used, altered, or disclosed or accessed in an unauthorized manner and to detect fraudulent identify-verification activity, including when transmitting personal information in response to data subject requests. From time to time, we review our security procedures to

consider appropriate new technologies and methods. However, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect personal data, we cannot guarantee or warrant the security of any information. We cannot guarantee that your data will remain secure in all circumstances. If a data breach compromises your personal information, we will notify you and any applicable regulator when we are required to do so by applicable law.

Updates and Changes. We may add to, change, update, or modify this Notice to reflect any changes to how we treat your information or in response to changes in law. If we update this Notice, we will provide you with a new privacy notice or make an updated copy of it available to you.

Contact HR. For more information, if you have any questions or concerns, or if you wish to exercise your rights or lodge a complaint with us, you may contact us by using the information below:

- By Telephone: 800-288-8020
- By Email: legal@sirsidynix.com