

INTERMEDIA APPLICANT PRIVACY NOTICE

Last updated: March 2024

A. PURPOSE

Intermedia.net, Inc. and/or its affiliated legal entities (collectively, “we,” “us,” or “the Company”) are committed to protecting the privacy of the Company’s job applicants and candidates. This Applicant Privacy Notice (“Privacy Notice”) describes how the Company collects, uses, transfers, and stores and safeguards the personal information of applicants who apply for positions within the Company as well as individuals recruited by the Company (“Applicant Information”). A list of the Company’s employing legal entities is in Section L below (“Legal Entities”).

B. INFORMATION WE COLLECT (INCLUDING CATEGORIES OF INFORMATION COLLECTED)

We collect information about you throughout the recruitment process with the Company. This includes information that identifies you or has the potential to identify you. In some cases, the Applicant Information we collect may include sensitive Applicant Information, as permitted under applicable law.

The following is a non-exhaustive list of certain categories of Personal Information that we collect along with examples of each:

- **Personal Information:** name, signature, social security number, physical characteristics or description, address, telephone number, email address, passport number, driver’s license or state identification card number, or work permit/visa application information.
- **Online Identifiers (Internet/Electronic Activity):** Browsing history, device ID, IP address, cookies, and similar technologies.
- **Professional or Employment-related Information:** Employer, employment history, resumes and CVs, background checks, and other employment-related information.
- **Education Information:** Records maintained by an educational agency or institution that pertain to a student, such as grades and transcripts.
- **Sensitive Personal Information:** Social security, driver’s license, state ID, passport number, credit, criminal history; racial or ethnic origin; union membership; personal information concerning health, or sexual orientation, and account login credentials.

Sources: To the extent permitted by law and at the appropriate time during the application process or the pre-employment background check, screening or vetting process, the Applicant Information may be collected from various sources and may include:

- **Information you provide directly to us:** For example, we may collect information that you provide when completing an employment application or providing supplemental information for your candidacy. We may also collect information you provide at a job fair or other recruitment event.
- **Information from other sources:** If you were referred to a position, we may collect your Applicant Information from the person who referred you if they provide us with your resume or contact information. We may also obtain information about you from other sources, such as recruiters, references, and service providers (for example, staffing agencies, credit reporting agencies, and other similar persons or entities).
- **Information from websites/mobile apps/social media:** For example, we may screen social media profiles to obtain information about your work-related experience that you have made publicly available through third-party websites such as LinkedIn.
- **Information we collect automatically:** For example, when you fill out an application online, most browsers automatically accept cookies and collect other online identifiers (such as browsing history, device ID, IP address, etc.).

If we are not able to collect and use certain Applicant Information, we may not be able to process your application or perform the necessary steps to consider you for a position with us.

C. HOW WE USE APPLICANT INFORMATION

We primarily use your Applicant Information to provide you with an efficient experience in applying for a job with us. Your submitted application and any additional personal information will be used to:

- Assess your skills and interest in career opportunities with us;
- Process your application and set up interviews;
- Contact you by placing a voice call or through text (SMS) or email messaging;
- Conduct reference and background checks, as permitted by applicable law; and/or
- Compare information for accuracy and verify it with third parties.

If you accept employment with the Company, the information collected may become part of your employment record and will be used for employment purposes. If you do not accept employment with the Company, we may still keep your application for internal reporting and to allow us to consider you for other suitable openings within the Company in the future.

D. COOKIES

Non-essential and essential cookies are collected on some websites and mobile applications that the Company uses. You may refer to your browser's settings to adjust your privacy preferences.

E. LEGAL BASIS FOR PROCESSING YOUR APPLICATION

Our legal basis for processing Applicant Information depends on the information concerned and the context in which it was collected. Applicant Information is primarily processed with your consent when you provide it to us to process your application, review your suitability as an applicant, or conduct a reference or background check. In addition, Applicant Information may be processed in furtherance of our legitimate business interests, for instance, when receiving your information via a referral (in which case you may not even be providing your Applicant Information to the Company) or working with third parties to validate the accuracy of your information. In some cases, we may have a legal obligation to process your Applicant Information, in which case we will process your Applicant Information consistent with that legal obligation.

F. HOW WE SHARE APPLICANT INFORMATION

We may share your Applicant Information internally for purposes of recruiting and/or evaluating applicants. We may share your information with third parties that help facilitate and manage our recruiting, interviewing, pre-employment screening, and hiring processes. We may also share your information with third parties when we have a good faith belief that disclosure is required or permitted in order to comply with a subpoena, court order, or other applicable law, regulation, or legal process. In addition, we may share your information with third parties for benchmarking or other similar purposes; provided that, in such cases, your information will only be provided in an aggregated or anonymized form.

Categories of Third Parties with whom we may share or disclose Applicant Information, in order to facilitate the uses described in this Privacy Notice.

- **Professional Advisors:** Accountants, auditors, lawyers, and other outside professional advisors in all of the countries in which the Company operates.
- **Service Providers:** Staffing Agencies, Human Resource Information Systems providers, IT systems and support providers, and Credit Reporting Agencies.
- **Public and Governmental Authorities:** If we are required to do so by law, in response to a legitimate legal request.
- **Parties Related to a Corporate Transaction:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings), such as stock exchanges and business counterparties.

In the event that Applicant Information is provided to an outsourced third party, the Company will use commercially reasonable efforts to enter into a contractual agreement with the service provider to ensure that such service provider's personnel are bound to duties of confidentiality, maintains our right to ownership of information, and requires safeguards for physical, administrative and privacy precautions.

G. HOW WE TRANSFER APPLICANT INFORMATION

As we operate at a global level, we may need to transfer your Applicant Information to countries other than the ones in which the information was originally collected. In particular, our recruitment and staff data is hosted in the United States. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws.

H. DATA RETENTION OF APPLICANT INFORMATION

We will retain your Applicant Information for as long as required for purposes outlined in this Privacy Notice, as well as in order to comply with our legal obligations, to resolve disputes, and to enforce our contractual agreements.

I. ACCESS, MODIFICATION, AND REMOVAL OF APPLICANT INFORMATION

You can access, review, update, and correct your Applicant Information you provided to us via our online applicant portal if you created an account. Upon your request, we will remove your Applicant Information, although some information may be retained as permitted or required by law.

J. PROTECTION OF APPLICANT INFORMATION

We use appropriate technical and organizational measures to protect your Applicant Information, such as limiting access to Applicant Information to individuals with a need to know the information as part of their job duties (e.g., human resources) and other personnel that may evaluate you as a candidate.

K. YOUR RIGHTS OVER APPLICANT INFORMATION

Job applicants or candidates are entitled to the rights below:

- Access to and receive information about the Applicant Information we maintain about you.
- Notice of (in some jurisdictions) and an explanation about our privacy policies and practices relating to the handling of your Applicant Information at or prior to collection.
- An update, correction, amendment, restriction, or deletion of your personal information.
- Obtain the Applicant Information you provide with your consent, in a structured, machine-readable format.

In addition to the rights stated above, applicants and candidates located in specific jurisdictions may have additional privacy and data protection rights based on their jurisdiction and type of Applicant Information processed. Refer to the supplemental notice below based on your jurisdiction:

[California](#), [Canada](#), and [European Union \(EU\), European Economic Area \(EEA\), and the United Kingdom \(UK\)](#)

Your rights may be limited in some circumstances by local law requirements. You may exercise the applicable rights by contacting us as described under "Questions Related to Applicant Information" below.

L. LEGAL ENTITIES

Below is a list of the Company's employing legal entities and their respective countries:

- **Canada:** Intermedia.net Technologies Canada, Inc.
- **England and Wales:** Intermedia Technologies Company Limited
- **Georgia:** Intermedia Technologies Georgia LLC

- **Kazakhstan:** Intermedia Technologies Kazakhstan LLP
- **Netherlands:** Intermedia Technologies Company Ltd (Netherlands branch)
- **Portugal:** Intmed Cloud Technologies Portugal, Unipessoal LDA
- **United States:** Intermedia.net, Inc.

M. QUESTIONS RELATED TO APPLICANT INFORMATION

For inquires or complaints regarding this Privacy Notice, please email our Privacy Team at privacy@intermedia.com.

N. NOTICES AND CHANGES

We may update this Privacy Notice at any time by posting a revised version on the Company’s Applicant portal. The revised version will be effective immediately at the time of posting. If you do not agree to the changes, please contact us to deactivate your account (subject to the limitations described in Section I above (“Access, Modification and Removal of Applicant Information”).

O. SUPPLEMENTAL NOTICES

This supplemental notice section supplements the above Privacy Notice, which describes the personal information that we collect, the purposes for which we use it, the sources from which we collect the information, how long we retain it, the limited circumstances under which we disclose personal information, and to whom the information is closed.

Supplemental Notice for California Residents: California residents have rights under the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”). The additional disclosures within this supplemental notice are required by the CPRA.

In the past 12 months, we have collected, for our business purposes, each of the following categories of Personal Information, as defined in the California Consumer Records Statute.

Categories of Personal Information Collected

- Identifiers such as a name, alias, postal address, and unique personal identifier (for example, cookies, online identifiers, IP address, email address, social security number, driver’s license number, state identification number, immigration or citizenship information, passport number or similar identifiers).
- Protected classification characteristics under California or Federal law such as age, gender, race, sexual orientation, religious or philosophical beliefs, union membership, or other protected classifications.
- Internet/electronic activity, including but not limited to browsing history.
- Account log-in information, financial account information, passwords, or credentials.
- Education information.
- Health information.
- Professional or employment-related information.

The Company does not “sell” or “share” Personal Information or Sensitive Personal Information (each as defined by the CPRA) to third parties for monetary or other valuable consideration, nor for the purposes of cross-context behavioral advertising.

You may have certain rights under the CPRA to:

- Know categories, sources, and specific pieces of Applicant Information collected.
- Know the business purposes for sharing Applicant Information.
- Know the categories of third parties to whom we have sold or with whom we have shared your Applicant Information.
- Request deletion of your Applicant Information.
- Not be discriminated against if you choose to exercise your privacy rights.

- Opt-out of the sale or share of Personal Information.
- Exercise your right to easily port (transfer) your Applicant Information to another company.

Supplemental Notice for Canada Residents: Canada residents have rights under Canadian privacy and data protection laws to:

- Exercise your right to easily port (transfer) your Applicant Information to another company.
- Withdraw any consent you previously provided to us regarding the processing of your Applicant Information, at any time and free of charge. We will apply your preferences going forward, and this will not affect the lawfulness of the processing before your consent withdrawal.

Supplemental Notice for European Union/European Economic Area (EEA)/United Kingdom residents: Residents of the European Union/European Economic Area/United Kingdom have rights under applicable privacy and data protection laws, including the EU and UK General Data Protection Regulation (collectively, “GDPR”), to:

- Know the legal basis for processing Applicant Information.
- Restrict or object to the processing of your Applicant Information.
- Have the Applicant Information anonymized or deleted, as appropriate.
- Exercise your right to easily port (transfer) your Applicant Information to another company.
- Withdraw any consent you previously provided to us regarding the processing of your Applicant Information, at any time and free of charge. We will apply your preferences going forward, and this will not affect the lawfulness of the processing before your consent withdrawal.
- Lodge a complaint with a supervisory authority, including in your country of residence, place of work, or where an incident took place.

Transfer of Applicant Data (EU/EEA/UK): If you are located within the European Economic Area (EEA), we comply with European Union (EU) data protection law when transferring your Applicant Information outside of the EEA. Your Applicant Information may be transferred to, and processed in, countries outside the EEA, including the United States, where we are headquartered. These countries may not have similar data protection laws to the EEA. If the Company transfers your Personal Information outside of the EEA, it will protect it as described in this Privacy Notice or as required by applicable law.

In addition, the Company adheres to the EU-U.S. Data Privacy Framework (“EU-U.S. DPF”) and the UK Extension to the EU-U.S. DPF, as set forth by the United States Department of Commerce and the European Commission regarding the collection, use, and retention of Personal Information collected from individuals located in the EEA. The Company has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (“Principles”) with regard to the processing of Personal Information received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the Principles, the Principles shall govern. To learn more about the Data Privacy Framework program, please visit <https://www.dataprivacyframework.gov/>.

P. ACCEPTANCE TO PROCESSING

By submitting your application, you declare the following:

- I have read, understand, and consent to how my Applicant Information (for example, Personal Information, Background Check Data, etc.) will be processed in accordance with the terms of this Privacy Notice.
- I authorize the storage of Applicant Information for the purposes of contacting me for future job vacancies at the Company and the other purposes described in this Privacy Notice.
- I authorize the sharing of Applicant Information with the Company, and service providers operating in countries inside or outside of my home country, in accordance with the terms of this Privacy Notice.

- I hereby release and hold harmless the Company, and any person, firm, or entity that collects, processes, shares or discloses my Applicant Information in accordance with this Privacy Notice from any claim or action, suit, litigation, proceeding, arbitration, investigation as well as from liability that might otherwise result from the collection, processing, sharing or disclosure of my Applicant Information in accordance with the terms of this Privacy Notice.