

Career Site Privacy and Cookie Policy

Last updated: 7th of September 2022

99designs respects and protects the privacy of the users of our global career portal (the “Career Portal”). This Career Site Privacy and Cookie Policy (“Privacy Policy”) explains what information we collect during our recruitment process and why we collect it, how we use that information and how to access and update that information. Please note your use of our 99designs website and services is governed by any applicable General Terms and Conditions and our general Vista Privacy and Cookie Policy.

- **Applicability**

This Privacy Policy applies to every visit of our Career Portal, use of our recruitment services and all personal data of job applicants processed by 99designs Pty Limited or its subsidiaries (hereinafter: “Hiring Entity”, “we”, “our” or “us”) in connection with our recruitment process.

By visiting, accessing and using our Career Portal, you agree with and consent to the collection and use of the information as described in this Privacy Policy, including the transfer of your information and personal data to the various countries where our Hiring Entities offer career opportunities. We may also be required in some countries to share certain information anonymously to meet government compliance requirements.

- **Data Controller and Data Protection Officer**

The data controller responsible for the collection and further processing of your applicant information is the Hiring Entity.

99designs Pty Limited has its statutory and office address at Level 2, 41-43 Stewart Street, Richmond, VIC 3121, Australia, and is responsible for operating the Career Portal.

If you have questions regarding our Career Portal and your privacy, the following information or if you would like to contact our data protection officer, please send us an email at privacy@99designs.com.

- **Information that we collect**

This section of our Privacy Policy describes the categories of information collected by us, whether collected automatically, provided voluntarily by you or through our recruiters or other third parties:

Information Provided by You through our Career Portal:

- First and last name.
- Email address.
- Telephone number.

- Address.
- Country.
- The information provided by uploading your resume, cover letter, LinkedIn profile, website, blog or portfolio which can include your name, telephone number, email address, physical address, photo, linguistic skills, profile information or other Social Media details, and more information about your experience including previous employment information (e.g. date of hire, job title, team, work location etc.), education, job related skills & competencies and areas of interest.
- In some countries such as the United States of America (the “US”), we may ask you to provide on a voluntary basis, information about your gender, disability or Veteran status that allows us to monitor equal opportunity and comply with US federal regulations relating to Equal Employment Opportunity and Affirmative Action requirements.

We are proudly an Equal Opportunity Employer and we are committed to equal employment opportunity regardless of race, color, ancestry, religion, sex, national origin, sexual orientation, age, citizenship, marital status, disability, gender identity or Veteran status.

Information collected through our Recruiters, Employees or Third Parties:

- Initial phone screening results with recruiter.
- Assessment results (e.g. a code challenge).
- Job interview notes.
- Information collected by third parties such as recruitment agencies that will include personal data as listed hereabove.
- Information from your Social Media accounts, provided or imported by you as resume-information or accessible online, such as a LinkedIn or Facebook profile.

Information Collected Automatically:

- Your IP-address.
- The internet browser and device you use to visit and make use of the Career Portal.
- The date and time you visit, and how you use our Career Portal and access its content.
- **How we use your information**

Your information can be used for the following purposes:

- Provide you with the recruitment services through our Career Portal.
- Verify your eligibility or match you with the selection criteria as laid down in the job description.
- Due to the global spread of our business, making your job application information available to all our recruiters worldwide by entering this information in an international database. We also store information regarding your job application history and any other communication you may have with the involved recruiting

- department in the Hiring Entity.
- The administration of the recruitment process and if your application is selected, further scheduling and organizing of interviews. As part of the interviewing process your information may be accessible worldwide to employees with a manager-role in the event the open job is part of a team that is operating globally.
- In the event the recruitment process leads to you and the Hiring Entity entering into an employment agreement, the electronic file with your job applicant data will be used for entering into a contract with you and further processed as 'employee data'.
- Perform statistical data analysis and user research.
- In the event of a legal proceeding, to protect or defend us against a legal claim.
- When required by law and/or government authorities.

- **Legal basis**

The legal bases for processing your information including your 'personal data' (any information about an individual from which that person can be identified) are:

- **Fulfillment of contract:** where it is necessary to process job application data submitted by you and to assist in our determination as to whether to enter into a contract of employment (or engagement) with you.
- **Legitimate interest:** in order to improve or modify our application process or recruitment processes and to prevent fraud and maintain security.
- **Comply with legal obligation:** In some cases we may be legally required to process data about you or use your data to help us establish or defend against legal claims.
- **Consent:** Where required under applicable law, we will obtain your consent prior to processing, for example when we ask you to provide us with sensitive data such as your passport copy, visa and work permit details or social security number, we will only do so after the involved recruiter of the Hiring Entity has informed you about the reasons why we need this information from you and obtaining your prior explicit consent.

You may request that we delete your information (or alter it so that you are not identifiable) at any time or withdraw your consent as explained below under Section 9. In that case, your profile together with all its content will be closed and deleted.

- **Third Parties and Transfers**

We may provide the job application data we collect about you to other companies in the Cimpress plc group and other third parties who:

- Provide us with the software and cloud services in support of the Career Portal and all its recruitment services, including the email delivery service that manages the job application updates. We use the cloud-based BambooHR-platform from the service provider BambooHR LLC;

- Provide hosting and maintenance support for the Career Portal as well as the local technical and IT support for the involved databases, systems etc. (namely the involved provider BambooHR LLC) and limited members of the IT department of the involved Hiring Entity;
- Assist in the recruitment and/or placement process, such as recruitment agencies or recruiting and HR departments of other Hiring Entities in the Cimpress plc group;
- As a service provider to a local Hiring Entity, provide us with employee health and benefit services, e.g. benefit providers or insurance companies;
- Advise the Hiring Entity during the recruitment process, e.g. legal counsels, tax consultants or other type of advisors.

Like our recruiters or other employees involved with the recruitment process who may have access to your job application data, these third parties are bound to keep all such information confidential and to use it only as provided in their contracts with us.

Job application data that is made available to third parties outside the European Union, Switzerland and the United Kingdom, including any other Cimpress plc group company besides the Hiring Entity, are subject to contractual restrictions that are consistent with this Privacy Policy.

The companies in our Cimpress plc group as well as our service providers including those located in the US or any other country that is not deemed by the European Commission to provide an adequate level of protection, have agreed to the applicability of the standard contractual clauses for the transfer of personal data as included in the Commission Implementing Decision (EU) 2021/914 of 4 June 2021, to establish an adequate level of data protection for personal data shared outside the European Economic Area, Switzerland and the United Kingdom, as may be amended, superseded, or replaced from time to time.

- **Security**

We are committed to taking the necessary technical and organisational measures to protect your personal data against loss and unauthorised use, access and disclosure. These measures include but are not limited to encryption methods, access control, controlled administration of user rights and by limiting the access to the personal data to those persons, partners, affiliates and any other third parties who have a business need for such access in connection with the Hiring Entity as described herein and adhere to this Privacy Policy. We also refer to the Privacy Policy of the third-party provider - Bamboo HR LLC - of the Bamboo HR-platform and cloud services behind our Career Portal.

- **Retention**

When your job application is successful, the Hiring Entity will further process the electronic file with your job applicant data as 'employee data'.

If our recruiter informs you that you are not selected as a suitable candidate or the recruitment process was otherwise not successful, we will keep your personal data for a period of 1 year after such notification or closure of the application process, to be able to comply with the retention terms by law or as long as is necessary for the job recruitment processing activities mentioned in this Privacy Policy. Please note, however, that we may retain some information for a longer period if required by law or as necessary to protect ourselves from legal claims.

- **Your data subject rights and how to exercise them**

Subject to the applicable law and dependent on certain conditions, you may have the following rights:

- Access your personal data including your uploaded resume or cover letter and other application data submitted by you;
- Request a copy of the personal data that you provided to us, to be transmitted in a workable format, by addressing such a request to the involved Hiring Entity or in writing by sending an email to privacy@99designs.com;
- Correct or update inaccurate or incomplete personal data;
- Delete your information (or alter it so that you are not identifiable) at any time;
- Withdraw and/or remove an (ongoing) application”;
- Withdraw any specific consents you gave us to use certain items of your personal data;
- Restrict the personal data we hold about you, or object to particular ways in which we are using your personal data;
- Lodge a complaint with a local supervisory authority.

If you wish to exercise any of the rights listed above, you can contact your Hiring Entity by visiting its local country-site and use any of the details under the link ‘Contact’ or us an email at privacy@99designs.com.

For the protection of your privacy and personal data, we may need to verify your identity before responding to your request.

- **What are cookies and why do we use them on our Career Portal?**

Cookies are small data files which often include a unique identifier that are stored via your browser on your device when you visit certain web pages. Cookies are useful because they allow a website to recognize a user’s device. Like most websites, our Career Portal uses cookies that, among other things, let you navigate between pages efficiently, remember your preferences, and generally improve your experience.

The use of our Career Portal is generally possible without cookies that do not serve a technical purpose. This means that you can configure your browser to prevent traceability via cookies, that is, refuse that any third-party cookies are stored on your device as further explained in the below section.

- **How can you manage which cookies are placed on your device?**

Cookies allow you to take advantage of some of our Career Portal's essential features and we recommend you leave them turned on. Please be aware that if you disable or delete certain cookies, it could be that our Career Portal may not work properly.

The Help-menu on the menu bar of most browsers will tell you how to enable or prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer.

If you wish to control the collection of data for analytical purposes through Google Analytics from certain browser types, you may want to look into the use of Google's browser-plugin that allows you to opt-out from a site using Google Analytics.

If you'd like to opt out of cookies created by using a 'share' functionality through Social Media networks – such as Facebook and Twitter – we suggest you check those third-party websites for more information about their cookies and how to manage them.

- **Amendments and questions**

Our Privacy Policy may be amended from time to time. We shall publish each updated version on this page so that you are always up to date regarding the data we collect, how this data is used and protected and the circumstances under which we disclose it.

If you have any questions about your job applicant data, this Career Portal or our recruitment process, you can always contact your Hiring Entity by visiting its local country-site and use any of the details under the link 'Contact'. If you wish to contact our data protection officer, please send us an email at privacy@99designs.com.