



Contents

| • | Avanade Recruitment and Hiring Privacy Statement | |
|---|---|---|
| • | Scope and application | |
| • | Introduction / who is collecting your personal data? | |
| • | What personal data will Avanade collect? | |
| • | What will Avanade do with your personal data? | 2 |
| • | From what sources will Avanade obtain your personal data? | 4 |
| • | Who will have access to your personal data? Where are they located? | 4 |
| • | How long will Avanade retain my personal data? | 6 |
| • | How Avanade protects your personal data. | 6 |
| • | How to obtain a copy of Avanade's internal Privacy Policy, request access to your personal data or contact us with questions or feedback. | 6 |
| • | For job seekers from other countries | 7 |
| • | List of Avanade entities and their contact information | 7 |

If you are a California resident, please see our specific privacy statement for California residents here.

If you are a California resident, you have specific privacy rights under the California Consumer Privacy Act ("CCPA"). You can opt-out-here from any selling of your personal information.

This statement is also available in the following languages:

| Bahasa Malaysia | French | Spanish |
|----------------------|----------|---------|
| Brazilian Portuguese | German | Polish |
| Chinese | Italian | |
| Dutch | Japanese | |

In the event of any conflict between the English version and any translations of this Privacy Statement, the English version of this Privacy Statement shall prevail.

Scope and application

If you use Avanade's online career resources, we collect and process your personal data for recruiting and hiring-related purposes.

We may also use Cookies and other tracking technology and the same technologies we use for marketing (including Customer Relationship Management (CRM) databases, targeted e-mail & combining and analyzing personal data or digital profiling) to provide individuals with a personalized online experience, to send relevant information about careers and opportunities at Avanade, and to analyze the effectiveness of our recruitment efforts and resources.

More information about how your data will be used by Avanade during the recruitment process can be found below, or at the Careers website.

Introduction / who is collecting your personal data?

When you apply for a job at Avanade, Avanade will collect and use personal data about you during the recruiting and any hiring process. As described in this Privacy Statement, your personal data may be retained and used by Avanade for the purposes set out in the section "What will Avanade do with your personal data?" below. Please see below for information that Avanade may receive about you from third parties.

"Avanade" or "we" means the specific Avanade affiliates and subsidiaries, including Accenture PLC and any of its affiliates and subsidiaries who will collect, use, and maintain your personal data in connection with your application for employment, our recruiting, talent management processes, and any hiring process if you are extended an offer of employment. Any Avanade entity located outside the European Union will be represented by Avanade, Inc.

A full list of Avanade entities by country and their contact can be found here.

What personal data will Avanade collect?

The specific types of information requested from you and the manner in which that information is collected and accessed are determined by the requirements of the country in which the position is located, and not the country in which you reside.

The following categories of data will be collected by Avanade:

- Your personal details, including name, date of birth, and contact information.
- Data requested to provide during the recruitment process, to the extent allowed by applicable law.
- Data you submit in résumés / CVs, letters, writing samples, or other written materials (including photographs and videos).
- Data generated by interviewers and recruiters, based on their interactions with you or Internet searches where allowed under applicable law.
- Data provided by third-party placement firms, recruiters, or job-search websites, where applicable.
- Photograph, and images/audio/footage captured on CCTV or other video systems when visiting our office or captured in the course of recruitment events or video recruitment interviews.
- Recommendations provided on your behalf by others.
- Documentation required under immigration laws.
- Data about your prior employment, education, and where applicable, credit history, criminal records or other data revealed during background screenings.

- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation, subject to legal limits on the timing of collection and use of such data and other applicable limitations.
- Data about race, ethnicity, religion, disability, sexual orientation, gender identity, military/veteran status, for purposes of government reporting where required, as well as to support Avanade's inclusion and diversity goals, evaluate the effectiveness of our equal opportunity policy and promote diversity best practices. Data generated by your participation in psychological, technical or behavioral assessments. You will receive more information about the nature of such assessments before your participation in any of them.

One way that we collect information is through the use of cookies. Cookies are small files which allow Avanade to save and retrieve information about your visit and your use of our tools and websites. Please read our <u>cookies policy</u> for further information on this.

You are not required to provide any requested information to Avanade but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.

By submitting your information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information. Providing any inaccurate information may make you ineligible for employment.

What will Avanade do with your personal data?

Avanade will use your personal data for the following purposes and on the following legal bases:

| Purpose | Legal Basis |
|--|---|
| Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available. | Justified on the basis of Avanade's legitimate interests in ensuring that it recruits the appropriate employees for current or future roles. |
| Manage your application and undertake pre-hire and/or onboarding actions. | Justified on the basis of Avanade's legitimate interests of ensuring that it recruits/onboards the appropriate employees for current or future roles. |
| Facilitate communication with you related to your application. | Justified on the basis of Avanade's legitimate interests of ensuring proper communication within the organization and with you. |
| Perform administrative functions (e.g. reimburse you for interview-related expenses). | Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles. |
| Perform data analytics, including analysis of our applicant pool in order to better understand who is applying to positions at Avanade and how to attract top talent to assist with the sourcing and screening (but not for final recruitment decisions) when processing high volume of applications. | Justified on the basis of Avanade's legitimate interests of ensuring that it continually improves its recruitment processes. |
| Build profiles of candidates, including analysis of candidate data to gauge compatibility with a particular job and to develop estimates of future performance. Candidacy selection and hiring decisions are reviewed and conducted by an Avanade recruiting staff member and no automated decisions concerning candidacy are made without review by an Avanade recruiting staff member. | Justified on the basis of Avanade's legitimate interests in ensuring that it recruits the appropriate employees for current or future roles. |

In some cases, record your online interview for review by additional recruiters and hiring managers.

Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.

If you register on our Careers website or on other Avanade websites/tools/properties, we will enter you into a database to receive future mailings about Avanade positions, events and other relevant information you might be interested in. You will always be able to opt out of any marketing communication from Avanade. Any communications of this nature are governed by Avanade's privacy statement and may be opted out without prejudice to your application to Avanade employment.

Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.

Transfer your contact information, education data, employment data, application information and the CV, all as supplied by you in our recruitment system to the Avanade Careers system, or any similar recruitment system or site that we use to maintain to notify you about new positions that may be of interest to you. Your contact information will be used by the Avanade Talent Acquisition Team to send you one invitation to sign up for future position alerts and invitations to Avanade recruiting events, as well as one follow-up reminder. If you do not respond to these messages your contact information will be retained by the Avanade Talent Acquisition Team only for the purpose of ensuring that we do not contact you again. If you join the Avanade Careers system you will have future opportunities to opt-out of receiving messages and alerts if you choose.

Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.

Perform any legally-required reporting and respond to legal process.

Compliance with a legal obligation.

Where Avanade relies on its legitimate interests for a given purpose, it considers your potential interests, fundamental rights and freedoms and if those could be impacted by our processing activities.

In some situations, Avanade will process your personal data for the purposes mentioned in the table above based on your prior consent, to the extent such consent is mandatory under applicable law.

To the extent you are asked to accept this statement in one of our tools, such acceptance will be considered as your consent to process your personal data, only in the countries where such consent is mandatory. In all other countries, clicking on acceptance/agreement buttons, will be considered as a mere acknowledgement of this statement.

Avanade will not use your personal data for purposes that are incompatible with the purposes listed in this Privacy Statement, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

From what sources will Avanade obtain your personal data?

Avanade may obtain data about you from the following sources:

- From you, when you submit resumes or other information online;
- From other Avanade affiliates;
- From conversations with recruiters and interviews with hiring managers and other Avanade personnel or representatives, some of which may be recorded as well as from Internet searches that these individuals may perform (where allowed by applicable law), or data that they may obtain from job search or professional networking websites (e.g. monster.com, LinkedIn, etc.) where you may have made data about yourself publicly available;
- From previous employers;
- From social media (where allowed by applicable law);
- From third-party recruiters, staffing companies, or websites where you are introduced to Avanade through one. Avanade does not accept unsolicited resumes from 3rd party recruitment agencies, but does sometimes use such agencies subject to a written agreement. Any resume or other candidate information submitted outside of established candidate submission guidelines (including through the Careers website or via email to any Avanade employee) and without a written agreement or otherwise will be deemed to be provided for Avanade's use, and no fee will be paid should the candidate be hired by Avanade; and
- From background checks, as applicable. Where permitted by law, Avanade may contract with a third party to perform a pre-employment background screening. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. You will receive more information about the nature of such a background check before it begins. Where required by applicable local law, you may be asked to provide certain background check information, (which may include sensitive data) directly to Avanade.

These sources are private sources, unless where the source is expressly stated to be "public". Note that these sources may have been holding your personal data both inside and outside the EU.

Who will have access to your personal data? Where are they located?

In general, access to your personal data will be restricted to minimize the number of people in Avanade's global organization who need it for the purposes set out in this Privacy Statement, which may include your potential future managers and their designees, personnel in HR, IT, Compliance, Marketing, Legal, Finance and Accounting and Internal Audit.

As a global organization with globally distributed IT systems, your personal data may be transferred to other Avanade offices in Avanade's worldwide organization. Avanade has internal policies to ensure an equivalent level of protection is in place across Avanade's worldwide organization. Any transfers of your personal data to other Avanade offices (including transfers from within the European Economic Area (EEA) to outside the EEA) will be governed by Avanade's inter-company data transfer agreements. A list of the Avanade offices that may process your personal data, and their contact information, can be found here.

Furthermore, where there is a need, Avanade may share your personal data with third parties, such as third party service providers and public authorities. Before doing so, Avanade takes steps to protect your personal data. Any service providers and professional advisors to whom your personal data are disclosed are expected and required to protect the confidentiality and security of your personal data and may only use your personal data in compliance with applicable data protection laws. The following categories of third parties will have access to your personal data:



- Recruiters working for Avanade in the country where the position you are applying for is based. Such individuals may be based in a different country;
- Hiring managers and other interviewers. Often these individuals will be based in the country where the position is based, but in some cases, they may be located in other countries;
- The global Avanade Talent Acquisition team or similar Avanade teams, consisting of a limited number of individuals based in several countries;
- Individuals performing administrative and IT support functions;
- Authorized personnel at our service providers, including those that:
 - Use tools that currently or in the future hosts and supports the Avanade Talent Acquisition System, the Avanade Careers system or similar hiring/recruitment/talent management/HR related systems;
 - Host/manage virtual/online interviews, which may include recording interviews where the live interviews are not possible;
 - Provide analytics services to assist with/optimize the screening and sourcing process to find and hire candidates (always subject to a final human decision);
 - Perform background screenings, where applicable. These companies may be based in another country, and may obtain data from other countries where you have lived, worked or studied, as may be relevant as part of a background check. You will receive more information about any such check before it begins;
 - Assist Avanade in conducting psychological, technical or behavioral assessments;
 - And any other recruitment, onboarding and HR related service providers of Avanade.
- Government officials where legal reporting requirements may exist, or law enforcement agencies or private litigants in response to valid law enforcement process (warrant, subpoena, or court order); and
- 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 Avanade business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- A third-party in connection with any proposed or actual client project, to the extent allowed by applicable law.

Unless you are otherwise notified, any of your personal data from within the European Economic Area to third parties outside the European Economic Area (EEA) will be based on an adequacy decision or are governed by the EU standard contractual clauses, a copy of which can be obtained by contacting Avanade's DPO by e-mail at: avanadedpo@avanade.com). Any other non-EEA originating, international transfers of your personal data, will take place in accordance with the appropriate international data transfer mechanisms and safeguards. To the extent your consent is required in your country to transfer your personal data from your country to another country or to a third-party, your agreement with our privacy statement is considered as your consent to transfer your personal data to such country and/or third-party.

How long will Avanade retain my personal data?

If you are given and accept an offer of employment by Avanade, personal data collected during your pre-employment period will become part of your Avanade personnel records, to be retained throughout and for a period after your employment with Avanade. If Avanade does not employ you, Avanade may nevertheless continue to retain and use personal data collected during the recruitment process in order to consider you for new positions, and, if appropriate, to refer back to an earlier application if you submit a resume or other information to Avanade again in the future, as well as for system administration, to perform research and analysis, and to invite you to join the Avanade Careers system or similar Avanade platforms.

Avanade determines the retention period of your information based on the following retention criteria:

- Avanade retains your personal data as long as it has an ongoing relationship with you; For as long as allowed by applicable law, Avanade retains your personal data to match them against future open roles that we may want to inform you about;
- Avanade retains your personal data where it is required to do so by a legal obligation to which it is subject;
- Avanade retains your personal data where this is advisable to safeguard or improve Avanade's legal position (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

How Avanade protects your personal data.

Avanade attaches great importance to your right to privacy and the protection of your personal data. We want you to feel secure that when you deal with Avanade, your personal data are in good hands.

Avanade protects your personal data in accordance with applicable laws and our data privacy policies. In addition, Avanade maintains the appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto.

How to obtain a copy of Avanade's privacy policies, request access to your personal data, or contact us with questions or feedback.

If you have a question, comment, or complaint, wish to obtain more details on Avanade's Global Data Privacy Policy, or if you want to exercise any of your rights in relation to your personal data, **please contact us at avanadedpo@avanade.com**



Which rights do you have with respect to the processing of your personal data?

You have the right (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- Request access to your personal data: this right entitles you to request access to personal data we process about you, as well as to certain information on such processing;
- Request rectification of your personal data: this right entitles you to request the rectification or completion of any of your personal data that would be inaccurate or incomplete;
- Request erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes;
- Object to the processing of your personal data: this right entitles you to request that we no longer process your personal data;
- Request the restriction of the processing of your personal data: this right entitles you to request that we only process your personal data in limited circumstances, including with your consent;
- Request a copy or the portability of your personal data: this right entitles you to receive a copy of personal data that you have provided to us.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting Avanade's data protection team at avanadedpo@avanade.com. Please note that this will not affect Avanade's lawfulness of processing based on your consent before your withdrawal of consent, nor its right to continue parts of the processing based on other legal bases other than your consent.

If, despite Avanade's commitment and efforts to protect your personal data, you believe that your data protection rights have been violated, we encourage and welcome individuals to come to Avanade first to seek resolution of any complaint. You have the right at all times to lodge a complaint with the relevant supervisory authority, or to make a claim against Avanade with a competent court (either in the country where you live, the country where you work or the country where you deem that data protection law has been infringed).

Contact us to exercise any of your rights. You may also contact Avanade as data controller of your personal data via our Data Protection Officer at avanadedpo@avanade.com. (preferably electronically) or via post, clearly marked for the attention of the Data Privacy Officer, on the this address: Avanade, Inc., 1191 Second Avenue, Suite 100, Seattle, WA 98101.

List of Avanade entities and their contact information

Further information on Avanade (and, if relevant, its representative) can be found here: <u>HERE</u>. Any Avanade entity located outside the European Union will be represented by Avanade Inc.



North America

Seattle Phone +1 206 239 5600 America@avanade.com South America

AvanadeBrasil@avanade.com

Asia-Pacific

Australia Phone +61 2 9005 5900 Europe

_ondon Phone +44 0 20 7025 1000

About Avanade

Avanade is the leading provider of innovative digital and cloud services, business solutions and design-led experiences on the Microsoft ecosystem. With 43,000 professionals in 25 countries, we are the power behind the Accenture Microsoft Business Group, helping companies to engage customers, empower employees, optimize operations and transform products, leveraging the Microsoft platform. Majority owned by Accenture, Avanade was founded in 2000 by Accenture LLP and Microsoft Corporation. Learn more at www.avanade.com.

©2023 Avanade Inc. All rights reserved. The Avanade name and logo are registered trademarks in the U.S. and other countries. Other brand and product names are trademarks of their respective owners.

