



JOB APPLICANT PRIVACY NOTICE

Last updated and effective date: December 1, 2023

We value our job applicants and their privacy regarding the information they share with us. This Job Applicant Privacy Notice (“**Privacy Notice**”) applies to the personal data that Aras Corporation and its subsidiaries and affiliated companies (“**Aras,**” “**we**” or “**us**”) collect and process about you as a job applicant, how we use and protect this information, and the rights that may be available to you under applicable law in relation to this information. **We strongly encourage you to read this Job Applicant and Candidate Privacy Notice in its entirety.**

This Privacy Notice describes the handling of personal data Aras has obtained about internal and external job applicants, including referral and applicants who have applied directly through an online recruitment system as well as through third party agencies and recruiters on behalf of candidates. It also describes the handling of personal information of any prospective candidates or leads, such as those individuals who expressed an interest in receiving news and details about future Aras opportunities or other related communications. When we refer to personal information in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or is linked or reasonably linked to you, either alone or in combination with other information.

The Data Controller for your personal information is
Aras Corporation
100 Brickstone Square, Suite 100
Andover, MA 01810
United States
Phone: 978.806.9400
E-Mail: privacy@aras.com

Please note that depending on which Aras entity you engage with in relation to the application, an Aras affiliate may also be a data controller responsible for processing your Personal Data in relation to the application.

You are under no statutory or contractual obligation to provide Personal Data to Aras during the recruitment process. If, however, you do not provide the information, we may not be able to process your application or consider you for employment.

Personal Data we collect about you

When you apply for a job at Aras, we will ask you to provide us with personal data about yourself so we can evaluate your application. If this information is not provided, our ability to consider you as a candidate may be limited. You may also provide us with your personal data that we have not specifically requested (for example, your CV may contain information about your hobbies and social preferences). All information is provided on a voluntary basis and you determine the extent of information that you provide to Aras.

The type of personal data we collect about you may include:

- Identifiers
 - Personal (e.g., name) and contact details (e.g., phone number, email address, postal address or mobile number)
 - Citizenship and work authorization status
 - Username and password for the online recruitment system
 - Information about family and dependents (e.g., for relocation purposes)
- Professional and Employment Related Information



- Information contained in your resume or CV, and other documents related to the application or recruitment process (e.g., cover letter, transcripts, certifications)
- Other information you may choose to voluntarily submit to us in connection with your application (e.g., information contained in a cover letter, information disclosed in an interview or information you volunteer regarding your criminal records history (only to the extent permitted under applicable law), compensation history, family history or personal situation)
- Debarment, suspension or related information as it relates to an award for a contract from a US federal agency or relevant licenses)
- Educational information
 - Educational details (e.g., educational history, qualifications, certifications, skills) and job history (e.g., previous employment, roles, performance history)
- Personal Characteristics
 - Citizenship or immigration information (e.g., for visa purposes, right to work information)
- Health Information
 - Information about any health issues or disabilities (e.g., your disability status, any requests for accommodation in the application or interview process)
 - Information about your health status, where appropriate (e.g., confirmation of your wellness prior to attending an in-person interview)
- Electronic, Visual and Audio Information
 - On-premise location monitoring for security purposes (e.g., video surveillance when attending our premises for an interview)
- Internet Activity Information
 - Information about you using cookies and similar technologies when you use the recruitment system and browse our website (See our [Privacy Policy](#) for further information about how this works).
- Any other information you choose to share with us in connection with your application (e.g., information contained in a cover letter, information disclosed in an interview or information you volunteer to share with us, such as personal preferences, hobbies, social preferences, etc.)

Sensitive Personal Data

Aras does not request or require sensitive personal data regarding religion, health, sexual orientation, or political affiliation in connection with your application. If you have a disability and would like us to consider an accommodation, you may provide that information during the recruitment process.

For some countries, Aras may ask for information such as race, ethnicity, or gender for the purposes of monitoring equal opportunity; however, for the purposes of your application we do not require applicants to provide this information. If you provide this information, it will not be considered in the hiring or selection process. To the extent that you provide us with sensitive personal data (race, ethnicity, political opinions or beliefs, membership of a trade union or political party, physical or mental health information, sexual orientation or information related to criminal convictions or offences), you expressly authorize Aras to handle such information in accordance with this Privacy Notice.

Information from other Third Parties

From time to time, we may obtain information about you from public sources or third parties. For example, and only to the extent permitted under applicable law, we may conduct background screenings through a third-party service provider and verify information that you have in your application that relates to your past education, employment, credit and/or criminal history, as allowed by applicable law. You may also choose to provide us with access to certain personal data stored by third parties such as job-related social media sites (for example, LinkedIn). By authorizing Aras to have access to this information, you agree that Aras may collect, store, and use this information in accordance with this Privacy Notice.

We may collect the following data from other sources:



- Professional and Employment Related Information
 - Background check data, potentially including your criminal records history, employment history, educational history and/or compensation history, from employment screening agencies, publicly available registers or databases, former employers and/or educational institutions (as allowed by local laws)
 - Information about your performance or conduct from references, other Aras employees, clients or service providers, or former employers you work with and/or with whom you may have worked in the past who may provide feedback about you.
 - Information about you from Aras employees who interview you and who may provide feedback about you
- Internet Activity Information
 - Publicly available information from websites or social media, including information that you choose to voluntarily submit to us in connection with your application (e.g., when applying from LinkedIn)

How Aras uses your Personal Data

We need to process your personal data to manage the recruitment process, assess and confirm your suitability for employment, decide whether to offer a job, and respond to any questions you may have regarding Aras opportunities.

Aras will use your personal data for the following purposes:

- Recruitment processes that relate to selection and evaluation and the appointment of job candidates (temporary or permanent) for the job you have applied for and for subsequent job opportunities.
- General HR administration and management (in case you become an Aras employee)
- Carrying out satisfaction surveys (for example, to manage and improve the recruitment process)
- Application analysis such as verification of your employment references(s) that you have provided, background checks and related assessments
- Compliance with corporate governance and legal requirements (for example, to monitor diversity requirements)
- Communicate with you and inform you of current status of your application and future opportunities (unless you have told us that you do not want us to keep your information for such purposes) and, if required under applicable data privacy laws, with your explicit consent
- Respond to and defend against any legal claims should any arise in the context of the job application process

Profiling and automated decision making

Aras may also process your personal data in relation to your application for data and statistical analysis. We may deploy specific technologies for the purposes of enabling certain global-level recruiting analysis and diversity monitoring with your consent where permitted by applicable law, to comply with legal requirements or in Aras legitimate interests. Aras does not make any automated decisions in relation to your application without human involvement.

With Whom will Aras share your Personal Data

We take care to share your personal data only with those who really need it in order to perform their tasks and duties, and third parties with a legitimate business need. We may disclose your personal information to the following types of third parties:

- Aras group companies. Your personal data may be shared internally with other Aras affiliates, including Human Resources and Talent Acquisition, interviewers involved in the recruitment process, managers in the business area with the vacancy, and IT staff if access to the data is necessary for the performance of their roles.
- Third Party Service Providers. We may also share your personal data with third parties who provide services to us such as recruitment agencies, consultants, background services and attorneys. If your personal data is shared in this way, Aras will do so only on a “need-to-know” basis and we will seek to ensure it is only used in connection with the functions or services these parties will be performing for Aras and that your personal data is treated by them in a confidential manner. These service providers that Aras uses may change depending on the Aras entity



that employs you and may change over time but we will always seek to ensure that any third parties who handle your personal data will do so in a manner consistent with this Privacy Notice and in accordance with applicable law.

- **Other Third Parties.** Aras may also disclose your personal data to other third parties including:
 - As necessary to comply with our legal obligations, including in order to respond to a lawful government request, court order, administrative or judicial process (such as a subpoena or search warrant)
 - As necessary to establish, exercise or defend our legal rights
 - As necessary to protect your vital interests (for example, we may need to share your personal data with third parties in the event of an emergency)
 - Where we have otherwise obtained your explicit consent.

Aras will never sell, rent or lease your personal data to a third party.

Legal basis under which Aras processes your Personal Data

If you are an individual in the European Economic Area and Switzerland (“EEA”), our legal basis for our collecting and processing of your personal information is as follows:

- **Aras legitimate interests (e.g., Article 6(1)(f) of the GDPR):** We have a legitimate interest in the recruitment, selection, evaluation and appointment of new employees and the management and administration of the recruitment and HR process, to the extent these activities do not prejudice or harm your rights and freedoms. With this in mind, we use your personal information to:
 - Assess your skills, qualifications, and suitability for our career opportunities prior to entering into an employment relationship
 - Take measures to verify the information you have provided is true and accurate (e.g., by means of reference checks); and
 - Administer and manage your application process.
- **Aras Legal Obligations (Article 6(1)(c) of the GDPR):** We must comply with legal obligations to which we are subject. Therefore, we may process personal information to:
 - Conduct criminal background checks to the extent applicable law permits and as required for your role; and
 - Carry out our responsibilities under applicable employment laws and regulations, such as anti-discrimination or disability legislation.
- **Legal Disputes (Article 6(1)(f) of the GDPR):** Aras can use your personal data to deal with legal disputes and to establish, exercise and defend (potential) legal claims
- **Applicant’s free and explicit consent (Article 6(1)(a) of the GDPR):** We may seek your explicit consent to process your personal data in specific circumstances or process it where necessary to comply with legal obligations or for purposes connected to legal claims.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, contact us at privacy@aras.com.

How long we keep your Personal Data

If your application for employment is unsuccessful, we will hold your personal data on file after the conclusion of the recruitment process for the period allowed by applicable law in order to build a talent database for potential future recruitment activities. You may withdraw your consent at any time, at which point your personal information will be deleted.

However, if you are located in the European Economic Area (EEA) and you have consented to be admitted to our talent pool, we will hold your personal data on file for 24 months after the conclusion of the recruitment process in order to



build a talent database for potential future recruitment activities. At the end of the applicable period, or once you withdraw your consent, your personal data will be deleted.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained in line with our Employee Privacy Notice.

How do we protect your personal information

Aras uses appropriate technical, organizational, and administrative security measures to protect your personal data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. These security measures are designed to provide a level of security appropriate for the risk of processing your personal information.

International Transfers

We process your personal data in the local country where you submitted your application and through our global recruitment platform. This will involve transferring your personal data, including personal data collected in the European Economic Areas (“EEA”), United Kingdom (“UK”) and Switzerland, to the US and other countries as described below. Our parent company, Aras Corporation, may host these servers or utilize third party service providers, but in either case we will be responsible for the secure access to personal data.

In order to provide adequate protection of your personal data, we have in place contractual arrangements (where appropriate) with our group companies which cover these transfers and we will take all reasonable measures to safeguard your information whenever it is transferred. We will only transfer your personal information as permitted by law. Certain privacy and data protection laws require data controllers to put in place safeguards to protect personal information transferred across borders. To comply with this requirement, Aras has put in place agreements that include the standard contractual clauses recommended by the European Commission to provide adequate safeguards for personal information.

Transfers of Personal Data who are located in the European Economic Area, the United Kingdom and Switzerland to the US and other non-UK/EEA/Swiss jurisdictions (as applicable) will be made pursuant to appropriate safeguards, including:

- Ensuring that the Personal Data is transferred to countries recognized by the European Commission, the UK Secretary of State or under Swiss law (as applicable) as offering an equivalent level of protection; or
- Ensuring that such transfer is to a third party who uses appropriate safeguards in respect of the processing in question, including but not limited to the standard contractual clauses (including as amended in compliance with the requirements under UK and Swiss law), which are recognized as offering adequate protection for the rights and freedoms of data subjects, as determined by the European Commission, the UK Secretary of State or under Swiss law (as applicable).

| Country | Appropriate Safeguard |
|---|---|
| EEA (including Germany and Netherlands) | For transfers of UK/Swiss Personal Data, this jurisdiction is recognized as offering an equivalent level of protection by the UK Secretary of State and under Swiss Law |
| Japan | For transfers of EEA/UK Personal Data, this jurisdiction is recognized by the European Commission and the UK Secretary of State as offering an equivalent level of protection For transfers of Swiss Personal Data: Standard Contractual Clauses as amended in compliance with requirements under applicable Swiss law |
| United Kingdom | For transfers of EEA/Swiss Personal Data: this jurisdiction is recognized by the European Commission and under Swiss law as offering an equivalent level of protection |



| Country | Appropriate Safeguard |
|---------------|--|
| United States | For transfers of EEA Personal Data: Standard Contractual Clauses and/or transfers to recipients certified under the EU-U.S. Data Privacy Framework. For transfers of UK Personal Data: Standard Contractual Clauses as amended by the UK Addendum and/or as applicable, transfers to recipients certified under the UK Extension to the EU-U.S. Data Privacy Framework For transfers of Swiss Personal Data: Standard Contractual Clauses as amended in compliance with requirements under applicable Swiss Law and/or as applicable, transfers to recipients certified under the Swiss-U.S. Data Privacy Framework. |

Security and Confidentiality

We maintain (and require our service providers) to maintain appropriate organizational and technical measures designed to protect the security and confidentiality of any personal information we process. If you have any questions on the security measures that we use to secure your personal data, you may contact us at privacy@aras.com.

Your Responsibilities

You are responsible for the information you provide to Aras and that it is honest, truthful, accurate and not misleading in any way. If you provide information concerning any other person such as individuals you provide as references, you are responsible for providing any notices and ensuring your reference sources have provided consent to Aras collecting and processing that information as described in this Privacy Notice.

Your Rights

Depending upon the applicable data protection law in your country of residency, you may have the right to ask Aras for information relating to personal information about you we control and process; to correct, delete, or restrict any active processing of your personal information; and to obtain a copy of your personal information in a structured, machine readable format.

If Aras has collected and processed your personal information with your consent, then you can withdraw your consent at any time by contacting privacy@aras.com. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information on lawful processing grounds other than consent.

Upon receipt of a request from you, we may need to request additional information about you to verify your identity or understand the scope of your request.

If you wish to exercise any of your rights or if you have any questions about these rights, please contact our Privacy Team at privacy@aras.com

Additional information for applicants in the EEA

In the European Economic Area and some other countries, you may have certain rights available to you under applicable data protection laws which may include the right to:

- Access (Article 15 of the GDPR): you have the right to request information about how we process your personal information and obtain a copy of that personal information
- Rectification (Article 16 of the GDPR): you have the right to request the rectification of inaccurate personal information about you and for any incomplete personal information about you to be completed



- Objection (Article 21 of the GDPR): you have the right to object to the processing of your personal information which is based on our legitimate interests (as described above)
- Erasure (Article 17 of the GDPR): you have the right to request the erasure of your personal information
- Automated decision-making (Article 22 of the GDPR): you have the right not to have a decision made about you that is based solely on automated processing, including profiling if that decision produces legal effects about you or significantly affects you. Aras does not, as part of its recruitment process, make solely automated decisions about candidates
- Restriction (Article 18 of the GDPR): you have the right to ask us to restrict our processing of your personal information, so that we no longer process that information until the restriction is lifted.
- Portability (Article 20 of the GDPR): you have the right to receive your personal information, which you have provided to us, in a structured, commonly used and machine-readable format and to have that information transmitted to another controller in certain circumstances.

You retain the right to lodge a complaint with a supervisory authority in your country of residence if you believe that Aras has infringed your rights under applicable data protection legislation.

Changes to this Privacy Notice

We will only use your personal data in the manner described in this Privacy Notice. However, we reserve the right to change the terms of this Privacy Notice at any time by posting revisions to our website. Any changes are effective immediately following the posting of such changes. We encourage you to periodically review this Privacy Notice for the latest information on our privacy practices.

Other Notices

This Job Applicant Privacy Notice is not intended to replace other notices provided by Aras in accordance with national and local laws and regulations. In the event of any conflict between this Privacy Notice and other notices required by local laws, the notices required by local law will prevail. This Privacy Notice applies to the processing of job applicant personal data by or on behalf of Aras anywhere in the world.

Contact Aras

If you have questions or concerns about this Job Applicant Privacy Notice or our handling of your personal information, please contact us at privacy@aras.com.

You may also contact the Data Protection Officer if you are in Germany:

Holzhofer Consulting GmbH

Martin Holzhofer

Lochhamer Str. 31

82152 Planegg

Tel.: (0 89) 1 25 01 56 00

E-Mail: datenschutzbeauftragter-aras@holzhofer-consulting.de