

# Applicant and Candidate Privacy Policy

Last Updated: June 29, 2023

At Snap, we aim to instill trust through honesty and integrity and we believe being transparent about how we handle your personal information is an important step towards that goal. Our Applicant and Candidate Privacy Policy (“Policy”) applies to everyone around the globe who has expressed interest or applied for a position to join our team.

This Policy explains the information Snap Inc., its subsidiaries, and its affiliates (“Snap”) collect during the application and recruitment process, how we use it, whom we may share it with, and the controls we offer you to access, update, and delete your information.

If you want to chat about anything in this Policy, don’t hesitate to contact us at [candidateprivacypolicy @ snap.com](mailto:candidateprivacypolicy@snap.com).

## Information We Collect

When you express interest in or apply to an open role at Snap there is certain information about you that we will need to collect. The information we collect from you may depend on the Snap office and role you’re applying to or the country or state in which you reside. The information we may collect includes:

- **Your contact information** such as your name, home address, email address, telephone number, and Snapchat username;
- **Your educational and professional history** such as your resume or CV, cover letter, relevant work or other experience, education, school transcripts, or other information you provide to us in support of an application or the recruitment process;
- **Your interview and related interview task assessment** such as information from interviews and phone screenings, including results of how you did on mock tasks;
- **Your role and compensation preferences** such as details of the type of employment you are or may be looking for, current and/or desired salary and other terms relating to compensation and benefits packages, willingness to relocate, or other job preferences;
- **Details of how you heard about the position you are applying for;**
- **Your sensitive or demographic information** such as self-ID or visual ID of gender, citizenship and nationality, information about your health such as vaccination status when legally required, racial or ethnic origin, or social security information (in the U.S.) obtained during the application or recruitment process that is necessary to process for regulatory requirements or our legitimate business purposes, as permitted by applicable law, or voluntarily provided by you;

- **Background checks** (where applicable), including information provided by third parties; and
- **Previous employment with Snap or applications you may have made to Snap.**

We may also collect information about you, for the purposes described in this Policy, from third parties, such as employment agencies and professional networks. If we determine that you may be a strong candidate for Snap, we may reach out to you to gauge your interest and request that you apply for a posted job opening. We're always looking for Smart, Kind, and Creative individuals to join our Snap family!

## How We Use Information

The main reason that we need your information is to assess your skills, qualifications, and interest against our career opportunities. But there are also other reasons why we may use your information at Snap, including:

- To verify your information and conduct background checks (where applicable) if you're offered a job;
- To communicate with you about your application(s) and the recruitment process, including, in appropriate cases, informing you of other potential career opportunities at Snap;
- To create and submit reports as required under any local laws and regulations, where applicable;
- Where requested by you, to assist you with obtaining an immigration visa or work permit, where required;
- To make improvements to Snap's application and recruitment process, including performing analytics and staying committed to a diverse, equitable, and inclusive environment; and
- To comply with applicable laws, regulations, legal processes, or enforceable governmental requests.

Additionally, your information may also be used to protect the rights and property of Snap, our users, applicants, candidates, employees, or the public as required or permitted by law.

## How We Share Information

When we share your information we do so on a "need-to-know" basis, meaning we'll only share your information internally or externally if there is a legitimate business need for it. Whenever we let third parties access your information, we'll take steps to make sure they have appropriate safeguards in place and that they only use the information in confidence and in a way that is consistent with this Policy. We may share your information in the following ways:

- **With other Snap group companies.** We may need to share your information with other Snap offices around the world to manage and administer our recruiting and application process.
- **With relevant Snap team members.** If you have been referred for a job at Snap by a current Snap team member, with your consent, we may inform that team member about the progress of your application and let the Snap team member know the outcome of the process.
- **With third-party service providers.** We may also make certain information available to third parties who provide services to us. Snap uses service providers to perform some of the services described above, including for verification/background checks.
- **With other third parties.** We may also share your information with other types of third parties on lawful grounds - for example:
  - To comply with our legal obligations, including with laws, regulations and contracts, to respond to court orders, administrative or judicial process, subpoenas, and search warrants or to meet national security or law enforcement requests;
  - With your consent;
  - To establish, exercise, or defend against potential, threatened, or actual litigation;
  - To detect, prevent, or otherwise address fraud, security, or technical issues , or to protect against harm to the rights, property or safety of Snap, our users, applicants, candidates, team members, or the public or as otherwise required by law; and
  - In connection with the sale, assignment, merger, or other reorganization or transfer of all or part of our business.

Please note, it is your responsibility to obtain consent from references before providing their personal information to Snap.

## Transfers of Your Information Globally

Many Snap functions are, in large part, managed centrally at our HQ in Santa Monica, California. This helps us to more easily manage recruiting and application programs at an international level. This means that if you're an applicant or candidate applying for a job outside of the US, your personal information may be transferred to the US. Also, because Snap has offices around the world and operates its business on an international level, we may also need to transfer your personal information to other countries where we operate, or where our service providers operate. When we transfer your information to a different country we'll take steps to comply with any applicable laws.

## How Long We Keep Your Information

We will keep your information for as long as is needed to carry out the purposes we've described above (or as otherwise required by law). Generally, this means we keep your information until the end of the recruiting process (unless you're offered a job with Snap in which case your information becomes part of your employment record), plus a period after that to respond to any inquiries, deal with any legal, administrative, or other business matters. That period may differ from country to country based on local laws.

## **What Rights You Have Over Your Information**

Depending on where you reside (for example the EEA/UK or certain US states), you may have a legal right to request details on the specific personal information we have collected about you and access and obtain a copy of such personal information. If any personal information about you is inaccurate you have the right to correct that information, either by doing so yourself (if technically feasible) or by asking us to correct the information for you. You may also have a right to request deletion of your information unless an exception applies; for example, where we need to retain your personal information for legal obligations. Other rights you may have may include restricting or objecting to the processing of your personal information and data portability, where applicable. Also, if we are relying on your consent to use your information, you have the right to withdraw your consent at any time. Bear in mind though that this won't affect the lawfulness of any processing that took place before the withdrawal.

Contact us at [candidateprivacypolicy @ snap.com](mailto:candidateprivacypolicy @ snap.com) if you have questions on your rights!

## **Additional Information to EEA, Switzerland, and UK Residents**

If you reside in the European Economic Area ("EEA"), Switzerland, or in the United Kingdom ("UK"), the Snap entity that you apply for a job with / engages you is the so called "controller" and has the main responsibility over your personal information.

When processing your personal information for the purposes explained in the "How We Use Your Information" section above, unless we obtain your consent, we are generally doing so because it is necessary: (i) for performance of our employment contract with you; (ii) for compliance with our legal obligations; (iii) for a legitimate interest (that we've assessed not to be overridden by your interests and fundamental rights and freedoms); or (iv) to protect your or others' vital interests.

As noted above, we're an international company and we may need to share information globally. When we transfer information outside the EEA, Switzerland, and UK, we rely on various transfer mechanisms including the Standard Contractual Clauses.

If you have concerns or complaints about how we use your information, please contact our Privacy Team or Data Protection Officer at [candidateprivacypolicy @ snap.com](mailto:candidateprivacypolicy @ snap.com). You also have

the right to file a complaint with the [supervisory authority](#) in the EEA and Switzerland, and in the UK you can file a complaint with the [Information Commissioner's Office](#).

## **Additional Information to California Residents**

### **We Don't Sell or Share Your Information**

California law requires us to inform you whether we sell your personal information or share your personal information with third parties (as “sell” and “share” are defined by the CPRA). We can gladly tell you that’s NOT the case! We do not sell your personal information and we do not share your personal information for cross-context behavioral advertising.

### **Specific Information We Collect**

California law also requires that we describe the personal information collected about California residents, including specific categories of information. Note that personal information does not include publicly available information. As we describe more in detail on the “Information We Collect” section, we may have collected the following categories of personal information in the past 12 months from you directly, or from another Snap group company, for purposes of Snap’s application and recruitment process:

- Identifiers, such as your name, address, email address, telephone number, other contact information, and Snapchat username;
- Characteristics of protected classifications under California or federal law, such as your gender, age, marital status, national origin, and if voluntarily provided your gender identification/expression, race, ethnicity, religion, sexual orientation, veteran status, disability, or request for reasonable accommodations;
- Internet and other electronic network activity information, such as session logs and activity on and interaction with our career website;
- Geolocation, such as your physical location;
- Professional or employment-related information, including your educational information;
- Visual information such as your photograph or recording; and
- Sensitive information such as your social security number, driver’s licence, state identification card, or passport number (as the case may be), your racial or ethnical origin, or information about your health such as vaccination status when legally required, sexual orientation other sensitive information if you choose to provide it to us.
- Inferences drawn from any of the above.

As mentioned under section “How We Share Your Information,” we may disclose your information with service providers or with other Snap group companies for business purposes.

### **Right to limit your sensitive personal information**

As a California resident you have the right to request that Snap limit the use or disclosure of your sensitive personal information to that which is necessary for the recruitment and application process at Snap. To learn more and to exercise your right please contact candidateprivacypolicy @ snap.com.

## **Updates To This Privacy Notice**

We'll continue to update this Policy to reflect any changes in our practices or if required by law. We'll indicate at the top of the Policy the date of the most recent update. We encourage you to check out the Policy periodically on our career site.