

# Applicant Privacy Statement

Effective Date: June 1, 2021

Wazuh, Inc. and its subsidiaries and affiliates (“Wazuh”, “we”, “us”, and “our”) are committed to protecting your privacy. This Applicant Privacy Statement (“Statement”) describes the privacy practices that apply to our collection, use, and disclosure of information relating to you as an identified or identifiable applicant (“Personal Data”) when you (“you”, “your” or “the Applicant”) engage with us for employment or internship opportunities, via any method (collectively, the “Sites”), as well as how we use and share that information. We appreciate your interest in Wazuh and take care to process and use your Personal Data responsibly.

## 1. Personal Data we collect

To process your application, we ask you to provide Personal Data about yourself. You provide your information voluntarily, and you determine the extent of information you provide to Wazuh. However, some information may be necessary to complete an evaluation of your application and without it, our ability to consider you as a candidate may be limited.

**1.1. Personal Data collected from you.** As an Applicant, you provide Wazuh with certain personal data, including educational and employment background, contact information and preferences, job qualifications, work permit or visa information, and jobs or other career opportunities for which you would like to submit an application. You also may choose to provide Wazuh with additional information, such as your CV, resume, or transcripts; employment references and related information; compensation requests; information about special needs or health conditions, and information relating to accommodations that you may request during the recruiting process.

**1.1.1. Sensitive personal data.** Some Personal Data may be considered sensitive personal data under certain privacy laws. Sensitive personal data includes, for example, government-issued identification number, information relating to a person’s race or ethnic origin, political opinions or religious beliefs, physical or mental health or condition, sexual orientation, or trade union membership. It may include information about an individual’s criminal offenses or convictions, as well as any other information deemed sensitive under applicable data protection laws. Wazuh does not request sensitive Personal Data in connection with recruiting unless permitted or required by local law (for example, for equal opportunity monitoring or internal policies related to diversity and anti-discrimination). Where required by applicable data protection or privacy law, we will obtain your consent to our use of your sensitive Personal Data.

**1.2. Personal Data collected from third parties.** Wazuh may also collect information from third parties who are lawfully entitled to share your information with us, for example, in connection with a background or employment check, or an employment reference. Other examples include social media sites (such as LinkedIn). Where permitted by law and to the extent applicable, Wazuh may also need to

carry out background or criminal checks to determine your suitability for an open position or opportunity.

**1.3. Personal Data automatically collected.** We automatically gather Personal Data from our Sites, for example, from our “Careers” page where you can visit and search for open positions. For more details about the Personal Data we collect through our Sites, see our Cookie Statement.

## 2. How we use your Personal Data

We use your Personal Data (as set out above) in our application and recruitment process for purposes including:

- Assessing your qualifications, skills, and interests against our career opportunities;
- Verifying the information you or others provide, and carrying out reference checks or conducting background checks (where applicable);
- Facilitating the recruiting and interview process;
- Preparing an offer letter, if your application is successful;
- Managing and improving our recruiting processes;
- Producing management reports containing analysis related to recruiting metrics, such as length of the recruiting process;
- Complying with applicable laws, regulations, legal processes, or enforceable governmental requests;
- Proactively researching your educational and professional background, and contacting you if we think you would be suitable for a role with us.

We will also use your information to protect the rights and property of Wazuh, our users, applicants, candidates, employees, or the public as required or permitted by law.

If you are offered and accept employment with Wazuh, the information collected during the application and recruitment process will become part of your employment record.

## 3. How we share your Personal Data

Wazuh will not sell the information on your application to unaffiliated third parties for their marketing purposes. We take care to limit access to your Personal Data to only those who need access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. We may share Personal Data about you with third parties in the following circumstances:

- Our subsidiaries and affiliated companies, in relation to the purposes described above.
- Vendors, consultants, and other service providers: We may share your Personal Data internally and with service providers, agents, and other third parties (for example, recruiters, consultants, attorneys, and background checking services as necessary in connection with recruiting, employment, corporate governance, acquisitions, and legal or regulatory requirements). We require these third parties to protect the information they receive with

appropriate security measures and prohibit them from using the information for their own purposes or outside what is necessary to provide the service.

- Compliance with laws or any competent law enforcement body, regulatory body, government agency, court, or third party: We may disclose information where we believe disclosure is necessary or required by law or regulation, to comply with legal process or government requests (including in response to public authorities to meet equal opportunity laws, national security, or law enforcement requirements); or to exercise, establish, or defend our legal rights.
- Business transfers: We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, acquisition, dissolution, corporate reorganization, or similar event. We will inform any buyer that your information shall only be used in accordance with this Statement.
- With your consent: We may consensually disclose your Personal Data for any other purpose.

## 4. Our legal bases for processing your Personal Data

**4.1. EEA and Switzerland.** Our legal bases for processing your Personal Data in the EEA and Switzerland, in the ways described in this Statement, include:

- As necessary to prepare and enter into an employment contract with you;
- Consistent with specific consents, which you may revoke at any time;
- As necessary to comply with our legal obligations;
- To protect your vital interests or those of others;
- As necessary for our (or others') legitimate interests, including our interests in considering candidates for current and future employment opportunities, and in managing and improving our recruitment and hiring processes, unless those interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal data.

**4.2. Data with special protections.** Information such as health information is subject to special protections under EU law. We may process such data where necessary to carry out our obligations or for the establishment, exercise, or defense of a legal claim by us, or with your explicit consent, or for the exercising of our rights, or your rights, in the context of employment or social security law. For example, we may need to process information about your health to accommodate any special needs you have when you come on site for an interview.

## 5. Your privacy rights

You may have a legal right under applicable law (for example, the European Union's ("EU") General Data Protection Regulation applicable to EU residents' personal data, or the California Consumer Privacy Act of 2018) to access the Personal Data we maintain about you. If you would like to review, correct, or update your Personal Data, or exercise any rights to withdraw your consent for us to collect any information, contact us at [privacy@wazuh.com](mailto:privacy@wazuh.com). We will try to respond to your request(s) as soon as

reasonably practicable, consistent with applicable law. Note, in some cases, and where permitted, we may charge a fee for data access requests.

## 6. International transfers of your Personal Data

Wazuh operates globally, which means your Personal Data, including Personal Data collected in the European Economic Area (“EEA”) or Switzerland, may be stored and processed outside of the country or region where it was originally collected. We will protect your Personal Data in accordance with this Statement wherever it is processed and will take appropriate contractual or other steps to protect it in accordance with applicable laws. These steps include implementing the European Commission’s standard contractual clauses and relying on the European Commission’s adequacy decisions about certain countries, as applicable, for data transfers from the EEA to the United States and other countries. We have implemented similar appropriate safeguards with our service providers, partners, and affiliates.

## 7. Security

Wazuh is committed to protecting the security of personal data. We use appropriate technical and organizational measures to safeguard your information. But no security procedures are guaranteed to be 100% secure. We encourage you to take care when disclosing Personal Data online and to use tools, such as endpoint security, Internet firewalls, anti-virus, anti-spyware software, and similar technologies to protect yourself online. If you have reason to believe that your interaction with us is no longer secure, please contact us immediately at [privacy@wazuh.com](mailto:privacy@wazuh.com).

## 8. Retention of your Personal Data

We will retain your Personal Data for as long as required to comply with our legal obligations, resolve disputes, and to enforce our contractual agreements, or as necessary for our legitimate interests, such as to consider you for other current and future employment opportunities at Wazuh.

If you are successful in your application for a position at Wazuh, we retain the information about your application process and information you provide during this process, as part of your employee records.

If you do not want us to retain your information for consideration for other roles, or want us to update it, contact [privacy@wazuh.com](mailto:privacy@wazuh.com). Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

## 9. Your responsibilities

You are responsible for the information you make available to Wazuh, and you must ensure it is honest, truthful, accurate, and not misleading in any way. You must ensure that the information does not contain material that is obscene, defamatory, or infringing on any rights of any third party; does not contain malicious code; and is not otherwise legally actionable. Further, if you provide any information concerning any other person, such as individuals you provide as references (“referee”), you are

responsible for providing any notices and obtaining any consents necessary for Wazuh to collect and use that information as described in this Statement before you provide the referee's Personal Data to Wazuh.

## 10. Changes to this Statement

This Statement is subject to occasional revision. We will provide notice of any material changes if and where required by applicable data protection laws. The date of the most recent update to this Statement can be found by checking the "effective" date displayed at the top of this Statement.

## 11. How to contact us

If you have any questions or concerns regarding this Statement, you may contact us via email at [privacy@wazuh.com](mailto:privacy@wazuh.com). If we are unable to resolve your concerns, you have the right to contact your local data privacy supervisory authority or seek a remedy through the courts if you believe your requests to exercise your rights have not been honored.