

## Employee Recruitment Privacy Policy

This policy describes the commitments of Descartes as it relates to the handling of personal information belonging to individuals who are in the employee recruitment process only. This policy is a supplement to and does not replace our general Privacy Policy. Where any contradictions exist between this policy and our general Privacy Policy, the terms of this policy will prevail.

As part of the process by which you may be considered for role with Descartes, either in a part-time, full-time or independent contractor capacity, we may ask you to provide personally identifiable information or "PII". PII provided in this context will only be used by Descartes for the purposes of recruitment and hiring/retention, which may include any of the following:

- Matching applicant data with current open positions;
- Communicating with applicants, including providing information about our recruitment and selection procedures, scheduling interviews and/or tests, providing updates on recruitment decisions, and to communicate additional opportunities; and
- Establishing or verifying applicant eligibility.

Applicant data can include data that is provided directly to Descartes by the applicant, as well as data provided to us on behalf of the applicant through third parties such as recruiting or employment agencies. PII may consist of any number of voluntary or required applicant data depending on the role or position we are recruiting for. The following table provides a list of the possible categories of PII that may be processed and why we may process it:

Categories of information	Examples	Why we need that information
Information about your identity	Legal name, aliases, date of birth, governmental or national identification number	To identify you, verify eligibility of employment, and conduct credit and/or background checks if necessary.
Contact information	Email address, phone number, mailing address, or user name if registration is required.	To schedule interviews and provide you updates on the recruiting process
Past employment performance and history	Previous employers, titles, roles, and responsibilities.	To verify work experience and assess potential work performance.
Personal and professional references	The names, contact information, and titles or roles of the person providing the reference	To verify qualifications, prior employment, and assess potential work performance.
Past academic performance and history	Official and/or unofficial academic transcripts	To verify qualifications.
Certifications and licenses	Licenses by regulatory authorities, evidence of professional designations	To verify qualifications and eligibility of employment
Work samples (where PII is present)	Non-confidential copies of previous work, or work specifically developed or created based on questions or scenarios posed during recruitment process	To verify technical abilities and assess potential work performance.
Disciplinary or criminal history	Disciplinary records from professional regulators or evidence of or the lack of prior convictions.	To verify eligibility of employment.

As Descartes is a global organization, Descartes conducts recruitment activities in multiple countries and may process and transfer PII to any of our affiliated companies within our worldwide operations. By providing PII to us, you consent to us transferring your PII to the various affiliated entities of Descartes in the countries where Descartes operates.

In some limited circumstances, Descartes may use a third-party data processor to process PII. Categories of processing may include the following:

- to conduct background checks (employment, criminal, credit, and academic as applicable);
- to verify legal entitlement to be employed in a specific country or region; and
- to be stored within applicant tracking systems or other human resources information systems operated for Descartes by a third party for later review or collaboration with other Descartes employed recruiters.

All third parties used by Descartes to process PII are required to use industry standard security to protect any data they have access to and may only process the information for the purpose, duration, and in the manner specified by Descartes.

All personal data collected during the recruitment process and controlled by Descartes will be retained for the duration of the recruitment process, and for up to twenty-four (24) months afterward. The amount of time personal data is retained by Descartes may be affected by law or regulation which may either increase or decrease the amount of time data is retained. After the retention period the personal data will be deleted.

If you become employed or engaged by Descartes, however, your PII may be transferred into other relevant systems for the purposes of processing salary or pay, managing your participation in our employee benefits program, and as reference material for comparative performance evaluations. The processing and disposal of that personal information will then be governed by our internal employee privacy policies.