

Scope

This privacy policy applies to the processing of personal data, which means information about an identifiable individual ("you"), that Sandvine Corporation and/or an affiliate of Sandvine Corporation in respect of the role for which you are applying ("Sandvine", "we" or "us") collects about individuals applying for a position with us ("Applicants", "you").

Please note that the General Data Protection Regulation (GDPR) applies to your involvement in our recruitment initiatives where:

- you apply for a position at our affiliates established in the European Economic Area ("EEA"), or
- you have been included in our global talent pool and our EEA affiliates have chosen to reach out to you, or
- you apply for a position at our non-EEA affiliates whose job advertisement is directed specifically to EEA residents.

This privacy policy refers to these situations as "**EEA recruitment initiatives**".

When we engage in the EEA recruitment initiatives you have a number of data protection rights under the GDPR, including a right to object to some of the processing which Sandvine carries out. More information about your rights, and how to exercise them, is set out in section 5 below. The GDPR also requires us to tell you about the legal bases for collecting and further processing your personal data. These are set out in section 2 below.

We also may provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information

1. What personal data we collect

- **Personal identification and communication information:** your name, home address, phone number, email address, nationality/citizenship, photo, national insurance number and immigration status / visa details, relevant passport.
- **Application-related information:** curriculum vitae (CV)/resume, cover letter, employment history, education history, qualifications and skills, reference contact information, position preferences, willingness to relocate, desired salary, interests and aspirations.
- **Data from other sources:** Sandvine obtains data about you from other sources, including: (i) private companies such as recruiters, employment research firms and identity verification services, the references you or your previous employers provide to us; and, where permitted by local laws, websites and other publicly accessible data on the Internet. We may also collect background screening information, if relevant and where permitted by local laws; this is further discussed below.
- **Sensitive information:** for example, information about your health and disabilities where we need to make any reasonable adjustments accommodations.
- **Details and content of communications and documents:** for example, most likely if we receive a court order to retain or disclose documents; this is further discussed below.

2. Why we collect, use and store this personal data

When we engage in the EEA recruitment initiatives, we collect, use and store your personal data for the reasons set out below.

- **As required to establish the employment contract.** This includes:
 - To make informed decisions on recruitment and assess your suitability for open positions.
 - To reimburse you for any agreed expenses incurred in the application process.

- **Where necessary for Sandvine or a third party's legitimate interests.** This includes:
 - To improve our recruitment process and activities.
 - To verify the details you have supplied and conduct background checks in certain jurisdictions; this is further discussed below.
To protect our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with grievances, legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including non-mandatory disclosure of such information in connection with legal process or litigation).
 - To use for statistical purposes to manage business operations as applicable.
 - To comply with our equal opportunity initiatives.

- **Where necessary to comply with a legal obligation.** This includes:
 - To comply with applicable laws, including, but not limited to, in connection with legal claims, equality laws, data protection laws, and other regulatory or investigative purposes (including mandatory disclosure of such information in connection with legal process or litigation).
 - Respond to court orders, warrants, or other lawful requests or legal processes.

Sandvine has carried out a balancing test in order to determine what is in its legitimate interests and you can request information about this balancing test by contacting us using the details set out in section 10 below.

- **Where you have given explicit consent.**

We may ask for your permission to consider you for future positions that may become available. In certain jurisdictions we may also ask for your permission to verify the details you have supplied and conduct background checks. This is further discussed below. Where we ask for express consent for data protection law purposes, you are free to withhold or later revoke it.

We do not collect, use and store special categories of your personal data, including information concerning your health, trade union membership, unless:

- Where necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law we use information revealing race, ethnic origin, sexual orientation and any disability may (to the extent permitted under local laws) be processed in order to facilitate effective equal opportunities monitoring and/or to comply with legal obligations to make reasonable adjustments.
- Where necessary for the establishment, exercise or defence of legal claims.
- Where necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee.

Some of the information above is required to process your application or to comply with our legal obligations. If such mandatory data is not provided, then we will not be able to establish the employment relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional and what will happen if you choose to withhold such personal data will be explained to you at the time. We indicate which information is mandatory on our recruitment webpage.

3. Background screening

Background screening information about you that we are permitted to collect may differ among jurisdictions in which we operate and so may legal bases for doing so. This is explained in the tables below – separately in relation to European and non-European locations.

Europe			
Type of check	Categories of data	Legal basis	Source
Criminal	criminal records	our legitimate interest	official comprehensive registers N/A to Sweden
Public information	adverse records available in the public domain	our legitimate interest	local language press and proprietary databases of publicly available information.
ID	validation of government-issued ID / passport	our legitimate interest	National authorities, e.g. Police in Sweden (Rikspolisstyrelsen Kiruna).
Education	degree information, including date received, degree title, and college/university/school attended	our legitimate interest	college/ university/ school attended
Employment	dates of previous employment, and title/position (up to 3 previous employers over 7 previous years)	our legitimate interest	previous employers
Global Sanctions and Enforcement	records of prohibited or restricted parties	our legitimate interest / our legal obligation	national and international sanctions lists
Credit (for finance positions only)	debts, bankruptcies, slow or delayed payments, non-payments, civil arrest warrants, and matter of civil litigation	our legitimate interest	Credit reference agencies, e.g. Upplysningscentralen UC AB (credit bureau) in Sweden

Outside Europe		
Type of check	Categories of data	Pertinent jurisdiction
Criminal	criminal records	worldwide
Public information	adverse records available in the public domain	worldwide
ID	validation of government-issued ID / passport	worldwide
Education	degree information, including date received, degree title, and college/university/school attended	worldwide
Employment	dates of previous employment, and title/position (up to 3 previous employers over 7 previous years)	worldwide
Global Sanctions and Enforcement	records of prohibited or restricted parties	worldwide
Credit (for finance positions only)	debts, bankruptcies, slow or delayed payments, non-payments, civil arrest warrants, and matter of civil litigation	worldwide
Government clearance- with applicant's permission	levels of government clearance	North America, Latin America
Drug screening	presence of drugs (as permitted by state laws)	USA
Other checks – with applicant's permission	as specified by the clients on an ad hoc basis, e.g. sex offence records	North America, Latin America

4. How we share your personal data

We will share your personal data with other members of the Sandvine Corporation and its affiliates for the purposes above. This includes your data being accessed to by our Global Acquisition Team which administers our talent pool.

Your personal data will be shared with companies providing services under contract with the Sandvine Group, such as recruiters, legal advisors, and IT hosting and/or IT maintenance providers, background check vendors.

Personal data will also be shared with government authorities and/or law enforcement officials, or disclosed in the context of court proceedings, if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

In the event that a Sandvine business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's advisers, and will be passed to the new owners of the business.

5. Your choices and rights

When we engage in the EEA recruitment initiatives, you have the right to ask Sandvine to provide access to, and a copy of, your personal data; to correct, complete and erase your personal data or to restrict (in certain situations) processing of your personal data; and to obtain the personal data you provide in a structured, machine readable format. In addition, you can object to the processing of your personal data in some circumstances (in particular, where we do not have to process the data to meet a contractual or other legal requirement and in relation to processing for direct marketing purposes). Where we have asked for your consent, you may withdraw consent at any time. If you ask to withdraw your consent to Sandvine processing your data, this will not affect any processing which has already taken place by that time.

These rights may be limited, for example if fulfilling your request would unfairly reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

If you would like to exercise these rights, you can contact us using the details set out in section 10 below. If you have unresolved concerns you also have the right to complain to data protection authorities in the country where you live or work, or where you consider a breach of data protection law has occurred. Also, when we recruit you for non-EU positions you may have some of the above rights.

You may have additional privacy rights in your local jurisdiction and this Policy will in no way limit or restrict your local privacy rights.

6. How long we retain your personal data

If you accept employment with us, we will retain your personal data throughout your employment in accordance with a separate notice we provide to you upon your acceptance of employment.

If your application is unsuccessful and you permit us to do so, we will retain personal data associated with your application for 12 months to enable you to be considered for future positions that may become available and to protect our legitimate business interests and legal rights.

In any event, we will only retain the outcomes of your background checks for 90 days from the completion of these checks.

7. International transfers

If you are located within the European Economic Area (“EEA”), your personal data will be processed in or accessed from jurisdictions outside of the EEA by members of the Sandvine Group and third party providers in jurisdictions that may not have equivalent data protection laws to those in the EEA.

When we transfer your data from the EEA or UK to the members of the Sandvine Group in the US, we use an intra-company processing agreement containing European Commission-approved standard contractual clauses. When we transfer your data from the EEA or UK to third party service providers outside the Sandvine Group, we use European Commission-approved standard contractual clauses to safeguard the transfer, unless we transfer personal data to a third party that has implemented Binding Corporate Rules, in which case we may rely on one of those mechanisms to safeguard the transfer. For further information, including how to obtain a copy of the documents used to protect your information, please contact us as described in section 10 below.

8. Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

9. Updates to this privacy policy

This privacy policy may be updated periodically. We will update the date at the top of this privacy policy accordingly and encourage you to check for changes to this privacy policy, which will be available at the HR section of Sandvine's internal Wiki. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this privacy policy, as required by applicable law.

10. Contact us

If you have questions about this privacy policy or wish to contact us for any reason in relation to our personal data processing, please contact our compliance officer via telephone: (519) 880-2600 or email: privacy@sandvine.com.

11. Appendix 1

Name	Address	Contact (address and email address)
Europe		
Hakan Tat	Malmo, Sweden	htat@sandvine.com
Outside Europe		
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