

FUJITSU DATA PROTECTION NOTICE FOR RECRUITMENT

1. INTRODUCTION

1.1 Fujitsu is committed to protecting the privacy of anyone who applies for employment or other engagement with Fujitsu.

1.2 This notice sets out information regarding Fujitsu's collection, analysis, disclosure and other use of Job applicants' personal information. If you accept employment with or are otherwise engaged by Fujitsu, we will subsequently collect more information about you and make other uses of the personal information collected during the recruitment process. This will be explained to you as part of the onboarding process and the use and processing of your personal data will then be governed by Fujitsu's employee or contractor privacy policy.

1.3 In this notice any reference to 'personal data' should be considered interchangeable with "personal information". If you are a resident of California, the following privacy notice applies: <https://www.fujitsu.com/us/Images/CALIFORNIA-CONSUMER-PRIVACY-ACT-NOTICE.pdf>

2 INFORMATION COLLECTED FROM JOB APPLICANTS

Collection of personal information

2.1 Fujitsu collects information about Job applicants in the course of the recruitment process. Some of this information is collected directly from you (for example, in forms that you are asked to complete, or in interviews or through the completion of tests). Other information is generated automatically when you use or otherwise interact with Fujitsu's systems (for example, when you log in to Fujitsu's online recruitment portal); or is provided to us by third parties (for example, recruitment agencies, referees (a person whose details you have provided to give you a reference) and educational institutions), including third party service providers or publicly available sources for, background checking and similar purposes, and to protect our business and comply with our legal, regulatory and information security obligations.

Categories of personal information

2.2 The information Fujitsu may collect about Job applicants includes (subject to applicable law):

2.2.1 information about yourself: name, email address, phone number;

2.2.2 information regarding your employment and educational history, any role or roles for which you are applying or being considered for and your relevant personal interests, attributes and career aspirations and plans;

2.2.3 in case applicable, responses from online assessments you complete during the application process, including psychometric tests and situational judgement tests;

2.2.4 in case applicable and where legally allowed, information on criminal records;

2.2.5 other information about yourself that you provide in a CV or similar document;

2.2.6 auto generated system logging information resulting from your access to the online recruitment portal; and

2.2.7 information given by you during an interview or information given by a reference you have provided to us.

Purpose of collection, use and processing

2.3 Fujitsu may collect and use your personal data on the basis of our legitimate interest in the following purposes:

- To assess your application against jobs you applied for at Fujitsu;
- To manage the recruitment process;
- To enable us to determine the offer of employment that we can make to you;
- To conduct the recruitment and selection process in a professional, inclusive and compliant manner;
- To contact you about job opportunities that we think you might be interested in;
- To create, maintain and secure your account on Fujitsu's online recruitment portal;
- To monitor and improve our recruitment processes and tools;
- To examine remuneration and consider giving appropriate welfare and benefits;
- To execute an employment agreement; or
- When applicable, establish, exercise and defend legal claims.

Lawful basis for use and processing

2.4 Unless consent is required by applicable law (as stated in paragraph 2.5) the use and processing of your data is based on Fujitsu's legitimate interest. Having considered the balance of interests, Fujitsu has assessed that Fujitsu's legitimate interest is not overridden by your fundamental interests and rights or freedoms, given the regular reviews and related documentation of the use and processing activities described in this document, the measures we have put in place to protect the personal data, the transparency provided on the use of personal data through this document, and the rights you have in relation to our use of your personal data.

In certain cases, Fujitsu may need to use or process your personal data to comply with a legal obligation. This may include Fujitsu's obligation to comply with equal employment opportunity and anti-discrimination legislation.

In some cases, we may not be able to consider your application if you cannot provide information that we request. Some information is optional and would not affect your application; this is made apparent in Fujitsu's online recruitment portal.

Consent

2.5 Fujitsu is entitled to use, disclose and otherwise process job applicants' (and former job applicants') information as described in this notice because Fujitsu needs to do so for the purposes set out in paragraph **Error! Reference source not found.** Unless otherwise stated in this paragraph **Error! Reference source not found.**, Fujitsu does not generally rely on job applicants' consent to collect, use or otherwise process their personal information other than in exceptional circumstances where the collection, use or processing is genuinely optional – in those circumstances Fujitsu will ask for your consent on a case-by-case basis.

Applicants in the Province of Quebec only

Fujitsu shall only use or process your personal data if your consent is provided to Fujitsu for the purposes set forth in this notice. In the case where you decline to give your consent, Fujitsu will not be able to fully assess your qualifications or complete the recruitment process.

3. USE OF PERSONAL INFORMATION

Use of personal information

3.1 Fujitsu uses job applicants' information in accordance with applicable law and as set out in paragraph 2 of this notice.

Unsuccessful applications

3.2 If your application does not result in an offer of employment or other engagement with Fujitsu, subject to our retention policy, Fujitsu may also retain your information for a certain period of time and use it to assess your suitability for future positions and roles within the organisation. Where required by applicable law, Fujitsu will get your consent to retain your personal data for this purpose. Your consent can be withdrawn at any time (see paragraph 6 (Retention and Deletion) for further details).

Automated decision-making

3.3 Fujitsu may make automated decisions about you in the context of our recruitment process, to determine your suitability for the role you have applied for. These automated decisions are taken in connection with the computer-based psychometric tests and situational judgement tests Fujitsu may ask you to complete during the recruitment process. Fujitsu has implemented measures to make sure that your privacy rights are safeguarded, but you have the right to request that any automated decision taken in connection with such tests is re-evaluated by an individual. Fujitsu does not make any automated decisions in relation to your application without human involvement. You can ask Fujitsu to consider your views and representations and to contest the automated decision by contacting Fujitsu HR on the relevant contact details set out in Schedule 1.

Security

3.4 Taking into account the nature of the processing, Fujitsu has implemented appropriate information security and technical measures to protect the personal information Fujitsu hold about you against any loss; misuse; destruction; unauthorised alteration/modification, access, disclosure; or similar risks. Fujitsu has also put in place reasonable and appropriate organisational measures to maintain the confidentiality and integrity of your personal information.

4. DISCLOSURE OF PERSONAL INFORMATION

4.1 Subject to applicable law, Fujitsu may disclose personal information, where reasonably necessary for the various purposes set out in this notice, to:

4.1.1 recruitment agencies working with Fujitsu in relation to your potential recruitment;

4.1.2 other service providers processing personal information on Fujitsu's behalf in the course of supporting Fujitsu's business and operations;

4.1.3 to an organization that takes over Fujitsu's business and assets, or relevant parts of them should this occur;

4.1.4 other companies part of the Fujitsu group;

4.1.5 third parties to whom Fujitsu is required to disclose information by law or by regulatory requirement (including litigation counterparties);

4.1.6 competent regulatory and prosecuting authorities; and

4.1.7 if you give us the names of potential referees, Fujitsu may disclose the fact that you are applying to work with us to them when Fujitsu ask them for references if you have authorized us to do so.

5. INTERNATIONAL DATA TRANSFERS

The disclosures of personal information described in paragraph **Error! Reference source not found.** may involve international transfers, including transfers to countries which do not have data protection laws as strict as those in the country in which you are based.

Any international transfers of your personal data will take place in accordance with the appropriate international/national data transfer mechanisms and safeguards and applicable laws.

6. RETENTION AND DELETION

Fujitsu will retain information about you for as long as is necessary to fulfil the purpose for which the information was collected including but not limited to throughout the

recruitment process. Some information will be retained for a certain period of time (and as provided in our retention policies) after the process ends, either because you are employed or otherwise engaged by us or because Fujitsu are required to retain such personal data under applicable law. If your application is withdrawn or is unsuccessful, Fujitsu may retain information, subject to applicable law, in case you apply to work for us again or a suitable position within the Fujitsu group becomes available or a recruitment-related dispute arises between us. Fujitsu will delete your personal data when it is no longer needed for the purpose for which it was collected unless Fujitsu is required to retain the data under applicable law.

Fujitsu will not retain your personal information when you request its deletion from our systems unless Fujitsu has a legal requirement or right to retain such personal information.

7. RIGHTS AND QUESTIONS

Data Subject Rights

7.1 You have the right (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- 1.1. request access to your personal data: this right entitles you to request access to personal data Fujitsu uses about you, as well as to certain information on such use or processing;
- 1.2. request rectification of your personal data: this right entitles you to request the rectification or completion of any of your personal data that would be inaccurate or incomplete;
- 1.3. request erasure of your personal data: this right entitles you, subject to applicable exceptions, to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes;
- 1.4. object to the use of your personal data: this right entitles you to request that Fujitsu no longer use your personal data subject to applicable exceptions;
- 1.5. request the restriction of the processing of your personal data: this right entitles you to request that Fujitsu only process your personal data in limited circumstances, including with your consent; and
- 1.6. request the portability of your personal data: this right entitles you to request the transfer of your personal data to an alternative organisation.

Fujitsu will verify your identity before processing requests to exercise your rights.

Contact Details

7.2 If you wish to exercise any of the rights described in paragraph 7.1 or have other questions about our personal information use and processing or related policies, please contact Fujitsu HR or the Fujitsu Data Protection Officer on the relevant contact details set out in Schedule 1.

Complaint

7.3 If, despite Fujitsu's commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, Fujitsu encourages and welcomes individuals to come to Fujitsu first to seek resolution of any complaint. To do this, please contact Fujitsu HR or the Fujitsu Data Protection Officer on the relevant contact details set out in Schedule 1.

You also have the right, at any time, to lodge a complaint about our processing of your personal information with your national / provincial / state data protection / personal information commissioner / authority / office.

Schedule 1: Contact Details

Jurisdiction and Company/Fujitsu HR	Contact Details
USA: Fujitsu North America, Inc. Fujitsu Network Communications, Inc. Fujitsu Research of America, Inc. Fujitsu Limited-DC Fujitsu Optical Components America, Inc. Globeranger Corporation	privacy@fujitsu.com
Canada: Fujitsu Consulting (Canada) Inc. Fujitsu Canada, Inc. Fujitsu Intelligence Technologies Inc. Fujitsu Frontech Canada Inc.	fujitsucanadaprivacyofficer@fujitsu.com or write to Fujitsu Canada Privacy Officer, 155 University Avenue, Suite 1600, Toronto, Ontario M5H 3B7
Fujitsu HR Americas Region	HRservicesRH@fujitsu.com