Job Applicant and Candidate Privacy Notice

Purpose
The purpose of this Job Applicant and Candidate Privacy Notice ("Notice") is to describe how Swarovski North America Limited, One Kenney Drive, Cranston, Rhode Island 02920 and its affiliates and subsidiaries (collectively, "Swarovski") collects, uses, stores, or otherwise processes Personal Data about job applicants and/or candidates (collectively, "you"), including when you access and use our careers websites, with whom we share your Personal Data, and the rights to which you are afforded. By applying for a position at Swarovski, you hereby agree that Swarovski has permission to process your Personal Data in the course of the application process as set forth below. You agree that your consent is voluntary and understand that you have the right to withdraw such consent at any time by contacting recruitment.compliance@swarovski.com, subject to Swarovski’s other legal obligations. Any job applicants or candidates that Swarovski chooses to employ will be subject to the Swarovski Employee Privacy Notice, which can be found here.

For purposes of this Privacy Notice, “Personal Data” means any information that identifies, relates to, describes, or is reasonably capable of being associated with you.

1. Collection of Personal Data
Swarovski processes your Personal Data, for the purposes of fulfilling open job positions and recruiting job applicants and/or potential candidates. During the application and recruitment process, we may collect the following categories of Personal Data about you:

- **Identifiers and Contact Information** such as your name, email address, phone number, date of birth, and emergency contacts.
- **National Identifiers and Work Eligibility Information** such as your national identification number, social security number, social insurance number, government identification number, country, region, and city of birth, nationality, citizenship status, visa status, residency and work permit status, and immigration information.
- **Demographic Information** such as includes your age, marital/civil partnership status, gender, and military service.
- **Education, Employment History** such as your resume, Curriculum Vitae, work history, professional background and, where applicable and allowed by applicable law, information associated with social media platforms (e.g., social media handle) or professional networking sites (e.g., LinkedIn profile).
- **Background Check Information** such as your credit history, criminal records, business contacts, and other information revealed during background screenings.
- **Credentials Login** such as the username and password you use to create an account on the Swarovski Careers website. You may be able connect this account with third party websites to provide certain data to Swarovski during the application process (e.g. LinkedIn); however, Swarovski cannot view and does not collect the login credentials to those third party websites (for example, Swarovski will not collect your LinkedIn username and password).
- **Special Categories.** We do not require you to provide your racial or ethnic origin, religious beliefs, trade union membership, or health or medical information (such as, disability status) during the application process unless the collection of such data is
required by applicable law. By providing us with any of these special categories of Personal Data, you hereby explicitly consent to the processing of such data as described in this Notice.

- **Additional Information You Provide.** We may collect any other information you voluntarily submit to us in connection with your application for employment (e.g., compensation history), including that which you provide during an interview, or as part of other forms of assessment.

In addition, we may automatically collect other categories of personal information when you use a Swarovski website to submit your application to us. We use this information to provide and improve our website and job application processes, for anti-fraud purposes, and to create aggregate internal reports on website usage and activity, such as views of certain job postings. These additional categories may consist of:

- **Online identifiers.** Swarovski may collect your IP address and other online identifiers when you use Swarovski websites.
- **Website activity information.** Swarovski may monitor and collect Swarovski website activity information, such as website clicks, content and page views, and the website each visitor visited prior to our website.

We collect your Personal Data either directly from you or from third-party sources. Examples of the third-party sources we use to collect Personal Data include employment screening agencies, background check agencies, recruiting agencies, service providers, former employers and/or schools and educational institutions, and publicly available information on websites or social media (e.g., when applying through LinkedIn, where relevant for recruitment purposes and allowed by applicable law).

### 2. Use of Personal Data

In general, and subject to applicable law, Swarovski may use your Personal Data to:

- Process your application for employment;
- Assess your qualifications and personal experience;
- Manage your relationship with us (e.g., facilitating meetings, communicating with you, providing you with requested information);
- Track an application through the recruitment process;
- Contact references with your authorization;
- Conduct background checks with your authorization;
- Evaluate you in the recruitment and hiring process, including to assess your eligibility for available positions at Swarovski;
- Evaluate you for current and future job opportunities;
- Conduct internal analyses to understand the job applicants and/or candidates who apply and to improve our recruitment process, including our diversity and equal employment opportunities efforts;
- Analyze job applicants and/or candidate life cycle trends and generating reports in an aggregated and/or de-identified format.
- Comply with legal obligations (e.g., health and safety, anti-discrimination laws).
To simplify the login process to the Swarovski Career website, or to import social media profile information in the website.

To allow you to import your profile information contained in professional and employment oriented social networks into the Swarovski Career website.

Aggregate/De-identified Data. We may combine the information we collect ("aggregate") or remove identifying pieces of information ("de-identify") to limit or prevent the ability to identify you. Please note, this Notice does not apply to information has been aggregated or de-identified such that it is no longer considered Personal Data under applicable data protection law.

3. Selling or Sharing of Personal Data

We have not sold or shared any Personal Data with any third parties in the preceding 12 months, as those terms are defined under the California Privacy Rights Act.

4. Disclosure of Personal Data

We may disclose Personal Data in the following circumstances (where applicable):

- **Internally.** We may disclose your Personal Data to the Swarovski group company offering the relevant job position that you applied for, along with the respective recruiters and line/HR managers responsible for making hiring decisions. Swarovski also reserves the right to disclose your Personal Data to other Swarovski group companies and HR/line managers for other positions in the event that you are not successful in the position for which you originally applied.

- **Services Providers.** We may disclose your Personal Data to service providers in connection with the provision of services including, but not limited to, the following: recruitment, talent acquisition and administration, technology services, background checks, where allowed by applicable law, and employment history checks. We have contracts with our service providers that limit their use of Personal Data as necessary to provide the services and that address the safeguarding and proper use of your Personal Data.

- **Affiliates.** We may disclose your Personal Data to affiliates under common ownership or control of Swarovski for purposes of recruiting or evaluating job applicants and/or candidates, resource planning, and talent and recruitment as well as other legitimate business purposes such as Human Resources administration and general business management and operations.

- **Your Employer or Organization or Reference Checks.** When you apply for a position at Swarovski, we may be required to disclose Personal Data when we contact your previous or current employer to verify your employment history or your references.

- **Public or Government Authorities.** We may disclose your Personal Data to comply with our legal obligations, regulations, or contracts, or to respond to a court order, administrative, or judicial process, such as a subpoena, government audit, or search warrant where we are legally compelled to do so. We also may disclose your information when there are threats to the physical safety of any person, violations of Swarovski policies or other agreements, or to protect the legal rights of third parties, including our employees, users, or the public.

- **Corporate Transactions.** Your Personal Data may be disclosed or transferred to relevant third parties in the event of, or as part of the due diligence for, any proposed or
actual reorganization, sale, merger, consolidation, joint venture, assignment, transfer, or other disposition of all or part of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding). If a corporate transaction occurs, we will provide notification of any changes to the control of your information, as well as choices you may have.

- **With Your Consent.** We may disclose your Personal Data in other ways if you have asked us to do so or have given us consent to do so.

5. **Retention of Personal Data**
We retain your Personal Data for a period of three years from your most recent application unless we are legally obligated to retain the data for a longer period of time. Where there are technical limitations that prevent deletion, aggregation, or de-identification, we continue to safeguard such Personal Data in compliance with this Notice and do not use such information other than to store it.

6. **Your Privacy Rights**
You may have certain rights related to your Personal Data as described in more detail below. To exercise any of these rights, please contact us via recruitment.compliance@swarovski.com or by calling +1 (800) 289-4900. Please see a description of the rights that may be available to you below:

**Right to Know and Access.**
The right to request information about our collection, use, and disclosure of your Personal Data, and ask that we provide you with certain information, such as:

- Categories and specific pieces of Personal Data we have collected about you.
- Categories of sources from which we collect Personal Data.
- Purposes for collecting Personal Data.
- Categories of third parties with which we share Personal Data.
- Categories of Personal Data disclosed about you for a business purpose.
- If applicable, categories of Personal Data sold about you and the categories of third parties to which the Personal Data was sold, by category or categories of Personal Data for each third party to which the Personal Data was sold.

To make a verifiable request for information about the Personal Data we have collected about you, you may reach out to recruitment.compliance@swarovski.com or by calling +1 (800) 289-4900. We will do our best to assist you without undue delay and within the time required by applicable laws. However, to the extent permitted by applicable laws, we reserve the right to charge a fee or decline requests that are unreasonable or excessive, where providing the Personal Data would be prohibited by law or could adversely affect the privacy or other rights of another person, or where we are unable to authenticate you as the person to whom the Personal Data relates.

**Right to Portability.** The right to request that we provide a copy of the Personal Data we have collected about you, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. Once we receive your request and confirm your identity, we will provide to you a copy of your Personal
Data as required under applicable laws. We may provide this data to you through via email to the email address you have provided with your request.

**Right to Delete.**
The right to request that we delete your Personal Data, subject to certain exceptions. To make a verifiable request to delete the Personal Data we have collected about you, you may reach out to recruitment.compliance@swarovski.com or by calling +1 (800) 289-4900.

**Right to Correct.**
The right to request that we correct inaccurate Personal Data that we have collected about you, subject to certain exceptions. Once we receive your request and confirm your identity, we will review your request, taking into account the nature of the Personal Data and the purposes of the processing of the Personal Data to see if we can correct the data. We may also request additional information showing that the Personal Data you want to correct is inaccurate.

**Right to Non-Discrimination.**
The right to not be treated different than other persons for exercising your rights regarding your Personal Data under applicable laws.

**Right to Opt-out of the Sale or Sharing**
The right to opt-out of processing of your Personal Data for the purpose of (i) targeted advertising, (ii) sale or sharing of Personal Data, or (iii) profiling to provide you with tailored content, including suggested advertising. We do not process your Personal Data for the purpose of (i) targeted advertising, (ii) selling or sharing your Personal Data, or (iii) profiling, as those terms are defined under applicable laws.

**Right to Limit Use and Disclosure of Sensitive Personal Information**
The right to direct Swarovski to limit its use of your Sensitive Personal Data to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services. California law considers the following pieces of Personal Data to be “sensitive:” social security number, driver’s license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data. We use Sensitive Personal Data only as it is necessary to perform the services for which it was collected, as described above.

**Do Not Track.**
Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not a common understanding of how to interpret the DNT signal, our websites do not currently respond to browser DNT signals. **Transfers to the U.S. and Third Countries.** Given the global scope and reach of the Swarovski group, it may be that recipients of your Personal Data are located in countries outside of the European Union and the European Economic Area, where the same level of data protection may not be in place. In such cases, Swarovski will take all measures to comply with legal requirements, including but not limited to, EU Standard contractual clauses, implementing binding corporate rules, and assuring...
protective and legal shields are in place. If you have any questions about our legal safeguards, you may contact recruitment.compliance@swarovski.com or by calling +1 (800) 289-4900.

7. Exercising Your Rights
This section describes the actions you can take to change or limit the collection, use, storage, or other processing of your Personal Data.

You can access and review your job application by logging into your account on the Swarovski Career website. If any of your Personal Data is inaccurate or incomplete, you can make changes by emailing recruitment.compliance@swarovski.com or by calling +1 (800) 289-4900. If you wish to delete your application and corresponding Personal Data, please contact us by emailing recruitment.compliance@swarovski.com or by calling +1 (800) 289-4900.

8. Changes to This Privacy Notice
This Notice will not form part of any potential employment contract and we may change it from time-to-time. We will post any changes to this Notice on this page. Each version of this Notice is identified at the top of the page by its version data.

9. How to Contact Us
If you have general or specific questions related to your application, you may contact us at corporatehr.communication@swarovski.com. We will always use our best efforts to respond to your questions and concerns. In addition, you have the right to approach the relevant data protection authority with your request or complaint. The competent authority in Switzerland is the Federal Data Protection and Information Commissioner (http://www.edoeb.admin.ch). The competent authority in California is the California Attorney General, Rob Bonta, (https://oag.ca.gov/contact/consumer-complaint-against-business-or-company).

For questions or complaints regarding our data use practices or this Notice, please contact us via recruitment.compliance@swarovski.com or by calling +1 (800) 289-4900.