

**Tealium Candidate Privacy Notice**  
**Effective as of January 1, 2023**

## **1. PURPOSE AND SCOPE**

This privacy notice (this “**Notice**”) describes the handling of personal data obtained from and about:

- individuals who have applied for a job at Tealium, including individuals who have applied directly to Tealium, individuals who have applied through third party agencies and recruiters;
- individuals who expressed an interest in receiving news and details about future Tealium employment opportunities; and
- individuals seeking to provide services to Tealium as independent contractors.

Each of the above categories are referred to as a “**Candidate**” or collectively as “**Candidates**” in this Notice. Personal data is information that identifies, relates to, describes, is associated with, or could reasonably be linked, directly or indirectly, with a Candidate.

Tealium is committed to honoring the privacy preferences and safeguarding the personal data of Candidates. Tealium does so by the measures Tealium has put in place to ensure transparency and security, by putting Candidates in control of their privacy choices, and using Candidates’ personal data for no other purpose than as communicated to them.

This Notice describes how Tealium Inc. and its subsidiaries and representative offices (“**Tealium**”) collects and processes personal data about Candidates, how Tealium uses and protects this information, and Candidates’ rights in relation to this information.

## **2. PERSONAL DATA TEALIUM COLLECTS**

Tealium will collect personal data from Candidates directly and potentially from other sources.

### **2.1 Data Tealium may collect directly from Candidates**

The categories of data that Tealium may collect directly from Candidates (including via an agency or external recruiter, if applicable) include:

- (a) Personal information such as name and date of birth, and contact details such as phone number, email address, postal address or mobile number;
- (b) username and password for Tealium’s online recruitment system;
- (c) information contained in Candidates’ resume or CV, and other documents related to the application or recruitment process (e.g. cover letter, transcripts, certifications);
- (d) information about Candidates’ education and job history. This includes educational history, qualifications, certifications, skills, previous employment, roles, and performance history;
- (e) information about family and dependents;
- (f) information about any health issues or disabilities (such as any requests for accommodation in the application or interview process);

- (g) citizenship or immigration information;
- (h) on-premise location monitoring for security purposes (e.g. to create badges if coming to Tealium's premises for an interview); and
- (i) other information Candidates may choose to voluntarily submit to Tealium in connection with an application. This includes information contained in a cover letter, information disclosed in an interview, or information Candidates volunteer regarding criminal records history, compensation history, interests, or personal situation.

Tealium may ask Candidates to provide Tealium with certain information regarding Candidates' veteran status, gender, race, and ethnicity. Tealium uses this data solely on an anonymized and aggregated basis in order to guide Tealium's diversity and inclusion efforts. Candidates may choose not to answer any questions regarding these topics and not answering such questions will not impact Candidates' applications for employment.

Tealium also collects information about Candidates' use of cookies and similar technologies when Candidates use the recruitment system and browse Tealium's website. Information about Tealium's use of cookies and other similar technologies can be found in Tealium's online privacy statement and cookie policy.

## **2.2 Data Tealium may collect from other sources:**

Tealium may collect the following data about Candidates from other sources (to the extent permitted by applicable laws):

- (a) background check data, potentially including Candidates' criminal records history, employment history, educational history and/or compensation history, from employment screening agencies, publicly available registers or databases, former employers and/or educational institutions;
- (b) information about Candidates from Tealium employees who interview Candidates and who may provide feedback about them;
- (c) publicly available information from websites or social media, including information that Candidates choose to voluntarily submit to Tealium in connection with an application (e.g. when applying through LinkedIn);
- (d) information about Candidates' performance or conduct from references, other Tealium employees, clients or service providers, or former employers Candidates worked with and/or with whom Candidates may have worked in the past who may provide feedback about Candidates; and
- (e) other information required for Tealium to evaluate Candidates' suitability for the position.

## **3. HOW TEALIUM USES CANDIDATES' PERSONAL DATA**

Tealium collects and uses Candidates' personal data for specific, necessary reasons. For example, Tealium uses personal data to:

- (a) create and manage Tealium's recruitment system, job applications, and

database of interested individuals;

- (b) assess and evaluate Candidates' skills, qualifications, and interests against the position applied for and/or other positions within Tealium;
- (c) communicate with Candidates in relation to an expressed interest in Tealium job opportunities, application, or the recruitment process;
- (d) verify Candidates' information, including through reference checks and, where applicable, background checks;
- (e) send information to Candidates about the onboarding experience at Tealium prior to Candidates' first day;
- (f) perform audits, assessments, maintenance, and testing or troubleshooting activities related to the recruitment system and Tealium's recruitment processes;
- (g) comply with legal obligations to which Tealium is subject and cooperate with regulators and law enforcement bodies;
- (h) respond to Candidates' inquiries and requests; and
- (i) use any data regarding Candidates' veteran status, gender, race, or ethnicity, solely on an anonymized and aggregated basis (except as otherwise required by applicable law) in order to guide Tealium's diversity and inclusion efforts.

In accordance with applicable laws and regulations, Tealium must have a legal basis to process Candidates' personal data. Generally, the legal basis Tealium relies on will be one or more of the following:

- (a) to comply with any contractual obligations between Tealium and a Candidate or to take steps to enter into an agreement governing employment terms or services agreement with Candidates;
- (b) to comply with Tealium's legal obligations. When Tealium is required by applicable law to collect certain personal data about Candidates, a Candidate's failure to provide this data may prevent or delay the fulfillment of Tealium's legal obligations and may impact Tealium's ability to employ the Candidate;
- (c) in furtherance of Tealium's legitimate interests. Broadly speaking, legitimate interest means Tealium may use the personal information Candidates provide to Tealium for Tealium's legitimate business interests to send communications or to gather information about how Candidates use Tealium's recruiting system. Before doing this, though, Tealium will also carefully consider and balance any potential impact on Candidates and Candidates' rights; and
- (d) upon consent. If Tealium asks for a Candidate's consent to process that Candidates' personal data, such Candidate may withdraw its consent at any time by contacting Tealium using the details at the end of this Notice.

#### **4. CANDIDATES' RIGHTS OVER THEIR PERSONAL DATA**

Candidates have certain rights under data protection laws in relation to their personal data. These rights include the following:

- (a) To access personal data;
- (b) To correct any errors in personal data;
- (c) To ask Tealium to erase or delete personal data;
- (d) To restrict Tealium's use of personal data;
- (e) To object to Tealium use of personal data;
- (f) To receive personal data in a usable electronic format and transmit it to a third party (right to data portability); and
- (g) To lodge a complaint with a local data protection authority or regulatory body.

It is important that the personal data Tealium holds about Candidates is accurate and current. Candidates are asked to please keep Tealium informed if their personal data changes during their relationship with Tealium.

Please contact Tealium at [HR@tealium.com](mailto:HR@tealium.com) to exercise any of the rights stated above. Please be aware that not all of these rights may apply in all circumstances. If Tealium is prevented from complying with any request, Tealium will inform you of the reason without undue delay.

#### **5. DATA SHARING**

Tealium does not Share,<sup>1</sup> Sell,<sup>2</sup> or market Candidates' personal data. However, Tealium may share Candidates' personal data with third parties in the following limited situations:

- (a) Tealium may share Candidates' personal data with other Tealium companies for recruitment purposes, human resource management, and internal reporting;
- (b) Tealium may share Candidates' personal data with its service providers that perform recruitment-related business operations for Tealium. For example, Tealium may engage third parties to audit its recruitment systems or

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<sup>1</sup>"Share," "Shared," or "Sharing," as defined by the California Consumer Privacy Act of 2018, as amended from time to time ("CCPA") means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.

<sup>2</sup>"Sell," "Selling," "Sale," or "Sold," as defined by the CCPA, means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for monetary or other valuable consideration.

practices. Tealium will ensure that it has appropriate contractual arrangements in place with any third party service providers to protect Candidates' data; and

- (c) Tealium may share Candidates' personal data with a law enforcement agency, court, regulator, tax authority, government authority, or other third party if necessary to comply with a legal or regulatory obligation, or otherwise to protect Tealium's rights, Candidates' rights, or the overriding rights of a third party.

## **6. DATA SECURITY**

Tealium takes appropriate measures that are designed to protect personal data from loss, misuse and unauthorized access, disclosure, alteration, and destruction, taking into account the nature of the personal data. These measures are aimed at ensuring the on-going integrity and confidentiality of personal data. Tealium evaluates these measures on a regular basis to ensure the security of the processing.

Tealium will keep Candidates' personal data until the position a particular Candidate is applying for has been filled, after which Tealium will retain that Candidate's personal data for a period of time to:

- (a) Maintain business records for analysis, understanding market trends and/or audit purposes;
- (b) Comply with record retention requirements as required by applicable legal or regulatory requirements;
- (c) Defend, establish, exercise, or bring any existing or potential legal claims;
- (d) Ensure fraud detection and prevention;
- (e) Respond to any queries or complaints a Candidate may have; and
- (f) With a Candidate's consent, suggest other positions at Tealium that may be of interest to that Candidate.

Tealium will delete personal data when it is no longer required for these purposes.

## **7. INTERNATIONAL DATA TRANSFER**

Tealium may transfer, store, or process Candidates' personal data in a country different from where Candidates reside. In all cases, Candidates' personal data will be protected as stated in this Notice and handled in accordance with applicable laws and regulations.

## **8. CONTACT US AND CHANGES TO THE PRIVACY NOTICE**

For questions or comments about this Notice, please email Tealium at [privacy@tealium.com](mailto:privacy@tealium.com) or [HR@tealium.com](mailto:HR@tealium.com). Candidates may also contact Tealium's Data Protection Officer by sending an email to [dpo@tealium.com](mailto:dpo@tealium.com). Candidates can also contact Tealium in writing at the address below:

Tealium Inc.

11095 Torreyana Road  
San Diego, CA 92121  
Attn: Legal Department

Tealium is committed to working with Candidates to obtain a fair resolution of any complaint or concern about privacy. If a Candidate believes that Tealium has not been able to assist with a complaint or concern, such Candidate has the right to make a complaint to the relevant data protection authority.

#### **9. CHANGES TO AND APPLICATION OF THIS PRIVACY NOTICE**

Tealium may make changes to this Notice from time to time to respond to changes in applicable laws and regulations, changes in technology, and changes to Tealium's business. Such changes will be posted within Tealium's online recruitment system. If any changes impact how Tealium processes personal data, Tealium may notify Candidates directly about such changes using the contact information that Tealium has on file.