



## **Offensive Security Applicant Privacy Policy**

This applicant privacy policy (“Policy”) describes how OFFENSIVE SECURITY SERVICES [refers to OffSec Services Limited, a Gibraltar company, Offensive Security Services, LLC, a US company and all related affiliates] collects, processes, and transfers individually identifiable information about you (“personal data”). By accessing or using this website, you consent to our Privacy Policy. Please read it carefully.

### **1. Responsible party for personal data processing**

OFFENSIVE SECURITY SERVICES is the responsible party for the processing of your personal data. OFFENSIVE SECURITY SERVICES may use third parties to process personal data on OFFENSIVE SECURITY SERVICES behalf. OFFENSIVE SECURITY SERVICES will establish or confirm appropriate contractual protections to safeguard the personal data that is shared with such third parties.

### **2. Purposes of processing and types of personal data**

OFFENSIVE SECURITY SERVICES processes personal data for various legitimate business and compliance purposes, as follows:

- To support the application process and organizational management using name, wage, position, department, job characteristics (e.g., position level, exemption status), location, start date, compensation, whether position or applicant has a restrictive covenant, and whether the position or applicant are eligible for transfer.
- To support personnel administration using name, address, date of birth, gender (consistent with applicable law and with consent where required), nationality (consistent with applicable law and with consent where required), type of employment contract, payment structure (e.g., hourly or salaried), ethnicity (consistent with applicable law and with consent where required), fax number, internet address, and full-time or part-time status.
- To conduct employee relations, talent management, and talent mapping functions using name ID, organization (not to include trade union membership), start date, jurisdiction, expat status, language, position, status, full-time/part-time,



gender (if permitted by applicable law and with your consent, if required), ethnicity (if permitted by applicable law and with your consent, if required), email, phone number, performance rating for each qualification, licenses or certification required to hold the position.

- To provide technical support, including password retrieval.
- To expedite the management of your employment relationship by providing your manager with direct access to limited personal data about you.
- To fulfill government requirements using information such as tax information, social security information and other statutory information.
- To conduct monitoring and enforcement of company policies and procedures, and compliance with legal requirements, including issues related to ethics, health and safety. And,
- To assist OFFENSIVE SECURITY SERVICES, its affiliates, or others to exercise legal rights, including to support any claim, defense, or declaration in a case or before any jurisdiction and/or administrative authority, arbitration, or mediation panel, or to monitor and prevent sexual harassment, discrimination, and/or criminal offenses.

The data element listed above for each purpose are not necessarily a complete list, but should be used as a guide and may need to vary from time to time to fit into the corporate needs and strategy.

### 3. Special kinds of personal data

OFFENSIVE SECURITY SERVICES will not process certain types of personal data that are regulated as highly sensitive under data protection law unless (i) you have consented, or (ii) the processing is required or permitted by applicable law. These special kinds of personal data include data about a person's religion or philosophy of life, race, political persuasion, health and sexual life or personal data concerning trade union membership as well as personal data concerning a person's criminal behavior, or unlawful or objectionable conduct connected with a ban imposed with regard to such conduct.



#### 4. International data transfers

Your personal data will be stored in databases used by the human resources department. The Human Resource Department and other department managers use manual files, spreadsheets, access databases and the like, to manage and store applicant personal data.

The personal data is maintained (either primarily or as a back-up system) on a server by OFFENSIVE SECURITY SERVICES in the United States of America ("USA"). Your personal data will therefore be transferred to and accessible by OFFENSIVE SECURITY SERVICES and its global affiliates for the purposes outlined above. Your personal data may be located in countries other than the country in which your personal data was originally collected. The laws in those countries may not provide the same level of data protection compared to the country in which you initially provided your data. Nevertheless, when we transfer your personal data to recipients in other countries, including the United States, we will protect that information as described in this Policy and in compliance with applicable law.

If you have questions about how OFFENSIVE SECURITY SERVICES handles your personal data, or you would like to access personal data that OFFENSIVE SECURITY SERVICES holds about you, please contact OFFENSIVE SECURITY SERVICES as described at the end of this Policy. Any questions that cannot be resolved with OFFENSIVE SECURITY SERVICES may be raised with local data protection authorities where applicable.

#### 5. Data security

Access to your personal data is strictly controlled through the extensive security system within the Company network. Access is limited to specific human resources professionals and other OFFENSIVE SECURITY SERVICES personnel who need your personal data to accomplish their jobs (an example is the recruiter or recruitment company).

#### 6. Data storage

OFFENSIVE SECURITY SERVICES will record your personal data for as long as necessary to achieve the purposes specified above, unless additional data is required to fulfill legal obligation. Your data will continue on the secure system for the period in which OFFENSIVE SECURITY SERVICES must use it (for example, to prepare



government tax statements), and then be archived or deleted, with specific timeframes determined by local laws and good business practice.

#### 7. Access and other rights

You may have rights under applicable data protection law, including, in some instances rights to view personal data that OFFENSIVE SECURITY SERVICES maintain about you, and to correct or delete inaccurate personal data, and oppose the processing of personal data in some circumstances. If you wish to request access to your personal data or otherwise exercise data protection rights, please contact OFFENSIVE SECURITY SERVICES as a described below. OFFENSIVE SECURITY SERVICES will respond to your request as soon as reasonably possible, and if your request is not compiled with, OFFENSIVE SECURITY SERVICES will explain to you the reasons for not complying.

#### 8. Questions

If you have any questions about your personal data or OFFENSIVE SECURITY SERVICES privacy practices, please contact [privacy@offensive-security.com](mailto:privacy@offensive-security.com)