

# Privacy Policy

Last updated: 1 March 2019

Cimpress N.V. and its subsidiaries (such as the Vistaprint companies) respect and protect the privacy of the users of our global career portal (the “Career Portal” or “Portal”).

## 1. Applicability

This Privacy Policy applies to every visit of our career site and Portal, use of our recruitment services and all personal data of job applicants processed by Cimpress N.V. or its subsidiaries (hereinafter: “Hiring Entity”, “we”, “our” or “us”) in connection with our recruitment process.

By visiting, accessing and using our Portal, you agree with and consent to the collection and use of the information as described in this Policy, including the transfer of your information and personal data to the various countries where our Hiring Entities offer career opportunities. We also may also be required in some countries to share certain information anonymously to meet government compliance requirements.

## 2. Data Controller and Data Protection Officer

The data controller responsible for the collection and further processing of your applicant information is the Hiring Entity.

The company Cimpress N.V. having its statutory and office address at Hudsonweg 8, 5928 LW, Venlo, the Netherlands, is responsible for operating the Portal.

If you have questions regarding our Career Portal and your privacy, the following information or if you would like to contact our data protection officer, please send us an email at [dataprotection@cimpress.com](mailto:dataprotection@cimpress.com).

## 3. Information that we collect

This section of our Privacy Policy describes the categories of information collected by us, whether collected automatically, provided voluntarily by you or through our recruiters or other third-parties:

### Information Provided by You through our Portal:

- Email address (or alternative username) and password.
- First and last name.
- The information provided by uploading your resume or CV which can include your name, telephone number, email address, physical address, linguistic skills, LinkedIn profile (or other Social Media details) and more information about your experience including previous employment information (e.g. date of hire, job title, team, work location etc.), education, job related skills & competencies and areas of interest.
- In some countries such as the US, we may ask you to provide on a voluntary basis, information about your gender, disability or Veteran status that allows us to monitor equal opportunity and comply with US federal regulations relating to Equal Employment Opportunity and Affirmative Action requirements.

We are proudly an Equal Opportunity Employer and we are committed to equal employment opportunity regardless of race, color, ancestry, religion, sex, national origin, sexual orientation, age, citizenship, marital status, disability, gender identity or Veteran status.

#### Information collected through our Recruiters, Employees or Third-parties:

- Initial phone screening results with recruiter.
- Assessment results (e.g. a code challenge).
- Job interview notes.
- Information collected by third-parties such as recruitment agencies that will include personal data as listed hereabove.
- Social media account data, provided by you as resume-information or accessible online, such as a LinkedIn or Facebook profile.

#### Information Collected Automatically:

- Your IP-address.
- The internet browser and device you use to visit and make use of the Portal.
- The date and time you visit, and how you use our Portal and access its content.

#### **4. How we use your information**

Your information can be used for the following purposes:

- Provide you with the recruitment services through our Career Portal.
- Verify your eligibility or match you with the selection criteria as laid down in the job description.
- Due to the global spread of our business, making your job application information available to all our recruiters worldwide by entering this information in an international database. We also store information regarding your job application history and any other communication you may have with the involved recruiting department in the Hiring Entity.
- The administration of the recruitment process and if your application is selected, further scheduling and organizing of interviews. As part of the interviewing process your information may be accessible worldwide to employees with a manager-role in the event the open job is part of a team that is operating globally.
- In the event the recruitment process leads to you and the Hiring Entity entering into an employment agreement, the electronic file with your job applicant data will be used for entering into a contract with you and further processed as 'employee data'.
- Perform statistical data analysis and user research.
- In the event of a legal proceeding, to protect or defend us against a legal claim.
- When required by law and/or government authorities.

#### **5. Consent**

The legal basis for processing your information including your 'personal data' (meaning any information about an individual from which that person can be identified) is your consent that is provided by you through your Consent Statement. You can withdraw your consent as explained below under Section 9 by going to your 'Candidate Profile'. In that case, your account together with all its content will be closed and deleted.

When we ask you to provide us with sensitive data such as your passport copy, visa and work permit details or social security number, we will only do so after the involved recruiter of the Hiring Entity has informed that you that such information from you is required and obtaining your prior explicit consent.

## **6. Third-parties and Transfers**

We may provide the job application data we collect about you to other companies in the Cimpress group and other third-parties who:

- Provide us with the software and cloud services in support of the Portal and all its recruitment services, including the email delivery service that manages the job application updates use of the Blueprint-platform (e.g. the cloud-based Blueprint-platform as provided by SuccessFactors, Inc., part of SAP, Inc.);
- Provide hosting and maintenance support for the Portal as well as the local technical and IT support for the involved databases, systems etc., e.g. the involved providers SuccessFactors, Inc. and SAP, Inc. and limited members of the IT department of the involved Hiring Entity;
- Assist in the recruitment and/or placement process, e.g. recruitment agencies or recruiting and HR departments of other Hiring Entities in the Cimpress group;
- As service provider to a local Hiring Entity, provide us with employee health and benefit services, e.g. benefit providers, insurance companies;
- Advise the Hiring Entity during the recruitment process, e.g. legal counsels, tax consultants or other type of advisors.

Like our recruiters or other employees involved with the recruitment process who may have access to your job application data, these third-parties are bound to keep all such information confidential and to use it only as provided in their contracts with us.

Job application data that is made available to third-parties outside the European Union and Switzerland, including any other Cimpress group company besides the Hiring Entity, are subject to contractual restrictions that are consistent with this Privacy Policy.

The companies in our Cimpress group as well as our service providers (with the exception of US providers that are committed to the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield self-certification programs) have agreed to the applicability of the standard contractual clauses for the transfer of personal data as included in the EU Commission Decision of 5 February 2010 (2010/87/EC), to establish an adequate level of data protection for personal data shared outside the European Economic Area and Switzerland.

## **7. Security**

We are committed to taking the necessary technical and organisational measures to protect your personal data against loss and unauthorised use. These measures include but are not limited to encryption methods, access control, controlled administration of user rights and by limiting the access to the personal data to those persons, partners, affiliates and any other third-parties who have a business need for such access in connection with the Hiring Entity as described herein and adhere to this Policy. We also refer to the Privacy Policy of the third-party providers - SuccessFactors, Inc. and SAP, Inc. - of the Blueprint-platform and cloud services behind our Portal.

## **8. Retention**

When your job application is successful, the Hiring Entity will further process the electronic file with your job applicant data as 'employee data'.

If our recruiter informs you that you are not selected as a suitable candidate or the recruitment process was otherwise not successful, we will keep your personal data for a period of 5 years after such notification or closure of the application process, to be able to comply with the retention terms

by law or as long as is necessary for the job recruitment processing activities mentioned in this Policy.

## 9. Your data subject rights and how to exercise them

You have the following data subject rights pursuant to the General Data Protection Regulation:

- Access your personal data including your uploaded resume or CV and submitted applications by clicking on 'View Profile'. Your data, job applications and uploaded documents are accessible by looking under 'My Documents', 'Profile Information' and 'Jobs Applied';
- Request a copy of the personal data that you provided to us, to be transmitted in a workable format by addressing such a request to the involved Hiring Entity or in writing by sending a letter to Hudsonweg 8, 5928 LW Venlo, the Netherlands (attn. Cimpress Recruiting Department);
- Correct or delete any details of your profile by placing the cursor in the form input field;
- Delete and/or replace an uploaded resume or CV by going to 'My Documents'. Look for the upload document and then click on the 'bin' symbol and upload a new resume or CV;
- Withdraw and/or remove an (ongoing) application by going to 'Jobs Applied'. Look for the involved job application and click on the 'Withdraw Application' button on the right side. The status of the application will be updated to "*Withdrawn by Candidate*";
- Close your candidate account and have your personal data that we hold herein, deleted by going to 'Settings' to click on the 'Delete Profile' button;
- Withdraw any specific consents you gave us to use certain items of your personal data by going to your 'Candidate Profile' to click on 'Search Options and Privacy'. If you click on 'Data Privacy Statement' a pop-up will open that allows you to revoke your consent. After you have revoked your consent, your account together with all its content will be closed and deleted;
- Opt-out from the job alerts or any other notifications by email about new opportunities by going to 'Job Alerts' directly (or via your 'Candidate Profile') and unticking the checkbox next to the 'Hear more about career opportunities' sentence or using the opt-out link in the email to unsubscribe.

If you need assistance besides using the functionalities in your account to exercise any of the rights listed above, you can contact your Hiring Entity by visiting its local country-site and use any of the details under the link 'Contact Us' or send a letter to the address Hudsonweg 8, 5928 LW Venlo, the Netherlands (attn. Cimpress Recruiting Department). If you wish to contact our data protection officer, please send us an email at [dataprotection@cimpress.com](mailto:dataprotection@cimpress.com).

For the protection of your privacy and personal data, we may need to verify your identity before responding to your request.

## 10. Amendments and questions

Our Privacy Policy may be amended from time to time. We shall publish each updated version on this page so that you are always up to date regarding the data we collect, how this data is used and protected and the circumstances under which we disclose it.

If you have any questions about your job applicant data, this Portal or our recruitment process, you can always contact your Hiring Entity by visiting its local country-site and use any of the details under the link 'Contact Us' or send a letter to the address Hudsonweg 8, 5928 LW Venlo, the Netherlands (attn. Cimpress Recruiting department). If you wish to contact our data protection

officer, please send us an email at [dataprotection@cimpres.com](mailto:dataprotection@cimpres.com). You can also lodge a complaint with the Data Protection Authority of your country.