



Global Applicant Privacy Policy

In order for us to consider your application for a position with NortonLifeLock, including its subsidiaries (collectively referred to as “NortonLifeLock”, “we” or “us”) it will be necessary for us to process certain personal data relating to you. We process personal data in accordance with applicable legislation, while considering and balancing the relevant interests of our applicants, ourselves, and other stakeholders

This Privacy Policy (“Policy”) applies to all individuals who apply for work to any NortonLifeLock companies and does not change an individual’s classification as an employee or contractor. This Policy is effective September 1, 2021.

1. Introduction

(A) Our commitment: This Policy is provided to all our global job applicants (“Applicants”). The protection of personal data of our Applicants, as well as compliance with applicable data privacy laws, is of great importance to NortonLifeLock.

(B) Purpose: This Policy provides information about: (i) the categories of personal data NortonLifeLock collects about Applicants; (ii) the purpose, use, and processing of the personal data collected; (iii) data sharing; (iv) security; (v) data retention; (vi) your rights regarding data; (vii) our data protection officer; (viii) cookies and tracking technologies; (ix) changes to the notice; and (x) contact information.

2. Categories of Personal Data Collected

NortonLifeLock may collect the following categories of personal data from Applicants as legally permitted, including:

- Your contact information including identifiers like your name, physical address, email address, telephone number, and other contact information;
- Your date of birth, social security number, passport number, driver’s license, or other applicable personal identifiers;
- Your professional or employment-related information like a resume, CV, cover letter, current and previous work experiences, other relevant experiences, education information, transcripts, certifications, professional licenses, or other supporting information submitted with your application;
- Information received from in-person interviews or telephone interviews;
- Information related to opportunities you are looking for, compensation expectations, benefits, willingness to relocate, or other job-related preferences;

- Information regarding how you heard about the position you are applying for;
- Information received from third parties if applicable, including information received from references, background checks, credit checks, drug tests, criminal history checks, and information from recruiters and/or other vendors;
- Information related to veteran status, if applicable;
- Information related to demographics including information obtained in the application process such as gender identification, citizenship and/or nationality information, health or medical information, and racial or ethnic origin;
- Publicly available information, including online information regarding your educational and professional background, that we believe to be relevant to your application;
- Information related to any assessment testing you may take during the application process; and
- Information related to right to work information including immigration visas, work permits, work authorizations, and other applicable information.

In addition, NortonLifeLock may collect the following categories of personal data (the “Pre-Hire Data”) from Applicants after they have accepted an offer of employment from NortonLifeLock (but have not yet started their employment):

- Biometric information (including but not limited to fingerprints, voice recordings, and photographs);
- Information related to demographics including disability status, veteran status or military service, city and region of birth, preferred pronoun, marital status, and sexual orientation; and
- Preferred name and emergency contact details.

Note that the Pre-Hire Data will not be used during the assessment or hiring process, as it is only collected after an offer has been extended and accepted by an Applicant.

3. Purpose, Use, and Processing of the Personal Data Collected

NortonLifeLock may, as legally permitted, use and process your personal data in the course of your employment application and the recruitment process for the purpose of:

- Verifying your identity related to background checks, credit checks, drug tests, work and educational history, transcripts, certifications, licenses (professional and driver’s license), or other supporting information submitted with your application;
- Assessing your qualifications, skills, and interests in comparison to the position applied for;
- Communication with you about your application and recruitment process, which may include additional opportunities at NortonLifeLock;
- Complying with any applicable local, state, or federal laws and regulations related to the employment application process. For example: compliance with local employment and right to work laws;
- Creating or submitting reports, if applicable, pursuant to any local, state, or federal laws;
- Improving the NortonLifeLock employment application process;
- Assisting you, if applicable, in obtaining work permits or immigration visas as

- required;
- Assessing your qualifications, skills, and interests for other potential opportunities at NortonLifeLock;
- Protecting the safety and security of personnel, visitors, customers and others;
- If you are offered and accept a position with NortonLifeLock, the personal data collected will become part of your employment record.

If the European Union Data Protection Law Applies:

- Assisting you to process additional information where necessary, with your consent, to take steps necessary to enter into an employment agreement if applicable;
- Determining whether to appoint you to the position you applied for;
- We may ask for your consent to process specific personal data in specific circumstances;
- We may process your information to comply with certain legal obligations or legal claims;

4. Data Sharing

NortonLifeLock will only share your personal data with third parties for the limited purposes of processing and accessing your application as described in this Policy. All our third-party service providers and other entities in the group are required to comply with applicable data protection laws and to take appropriate security measures to protect your personal data. NortonLifeLock does not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. NortonLifeLock may sometimes disclose your personal data as required to external third parties such as regulatory entities, tribunals, courts, and law enforcement. We may contact your third-party references with your consent as part of the application process.

Personal data is only transferred to third parties and/or outside the European Economic Area (“EEA”) if there is adequate protection:

- To third parties: Where the transfer of personal data to third parties is concerned, we will ensure that the required contractual obligations will be stipulated between NortonLifeLock and the third party. In case of international data transfer to countries that do not offer adequate protections outside of the EEA, we will ensure that appropriate safeguards as required by applicable laws, specifically standard data protection clauses adopted by the European Commission, will be put in place to protect the personal data.
- Within NortonLifeLock: NortonLifeLock is a global business, and as such need to transfer data internationally. NortonLifeLock is fully committed to ensuring that there are adequate safeguards in place, as required by applicable laws, to protect the personal data We transfer to countries that may not have adequate data protection laws. As part of this commitment, we have adopted an intracompany data transfer agreement which includes the standard data protection clauses adopted by the European Commission.

5. Data Security

NortonLifeLock has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered, or disclosed. NortonLifeLock limits access to your personal data to those employees, agents, contractors, and other third parties on a strict need-to-know basis. Third parties are contractually limited to processing your personal data on our instructions, and they are subject to a duty of confidentiality.

6. Data Retention

NortonLifeLock will retain your personal data for a limited period as specified by applicable law after we have communicated to you our decision about whether to appoint you to the position applied for. We retain your personal data so that we can show, in the event of a legal claim, the grounds for that decision, and that we have conducted the application process in a fair and transparent way.

If you are offered and accept a position with NortonLifeLock, your personal data will become part of your employment record at NortonLifeLock, and subject to the terms of our Employee Privacy Policy.

7. Your Rights Regarding the Data

Consistent with applicable law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request" in the EU). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to the processing of your personal data where we are relying on a legitimate interest and there is something about your situation that makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party.
- Not to be subjected to a decision based solely on automated processing, including profiling (e.g. automated processing of personal data to evaluate certain aspects about you), which produces legal effects concerning you or similarly significantly affects you unless it is:
 - necessary for entering into, or performance of, a contract between us; or

- authorized by law (e.g. for the purposes of fraud or tax evasion); or
- you provide your explicit consent.

If you want to exercise any of these rights, please contact us at nll_privacy@nortonlifelock.com.

8. Right to Withdraw Consent

When you applied for a position at NortonLifeLock, you provided consent to us processing your personal data for the purposes mentioned herein. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

9. Data Protection Officer

If you are in the EU and have any questions about this Policy or how we handle your personal data, please contact us in writing at nll_privacy@nortonlifelock.com. Additionally, you can also contact our Data Protection Officer at dpo@nortonlifelock.com.

You have the right to lodge a complaint directly with the data protection authority about how personal data is processed. Please find a link [here](#) with an overview of the relevant authorities.

10. Cookies and Tracking Technologies

NortonLifeLock and our service providers may use “cookies” and/or similar tracking technologies on our website, which includes our Careers section. Please see our NortonLifeLock Global Privacy Statement at <https://www.nortonlifelock.com/privacy/gps-english> for more information.

11. Changes to the Policy

NortonLifeLock reserves the right to revise or modify this Policy. In addition, NortonLifeLock may update this Policy to reflect changes to our data practices. Any revisions or modifications will become effective upon the posting of the revised Policy.

12. Contact Information

Please contact NortonLifeLock Global Privacy Office at nll_privacy@nortonlifelock.com.