

Privacy Notice and Policy for Candidates of Employment

Broadcom

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Privacy Notice and Policy for Candidates for Employment

This Privacy Notice and Policy for Candidates for Employment (the "Privacy Notice") contains information about how Broadcom Inc. and each of its controlled subsidiaries (together, the "Company") collects, stores, discloses, and uses your Personal Data during the recruitment process.¹

General Background

The Company is a "data controller," which means that it determines the purposes and means of the Processing of Personal Data. In some circumstances, the Company, or one of the legal entities within the Company, may also act as a "data processor," meaning that it Processes Personal Data on behalf of a data controller (for example, another legal entity within the Company).

For the purposes of conducting its business, performing its duties and complying with applicable laws and to the extent necessary to those effects, the Company will collect, store, hold, process, use, record, consult, disclose, erase, make decisions based upon, destroy and, in some instances, transmit Personal Data about you (the "Data Subject"). These activities are referred to as "Process/Processing".

This Privacy Notice is provided in compliance with, including but not limited to, the European Union's General Data Protection Regulation ("GDPR"). It concerns your Personal Data, which is any information relating directly or indirectly to an identified or identifiable natural person, as well as special categories of data (e.g. Personal Data revealing racial or ethnic origin, or data concerning health), together referred to as "Data" in this Privacy Notice. It describes how the Company collects and uses Data about you, during and after your application process, and indicates the types of Data the Company holds and the Processing activities the Company undertakes. It also describes when your Data may be transferred to third parties or between legal entities within the Company and the justifications for doing so.

This Privacy Notice will not form part of any contract of employment or other contract to provide services. The Company provides a separate Privacy Notice where required under applicable local law.

It is important that you read this Privacy Notice, together with any other complementary or supplemental privacy notice the Company may provide on specific occasions when collecting

¹ Personal Data is any information relating directly or indirectly to an identified or identifiable natural person. For the purposes of this Notice, the term Personal Data encompasses the similar and substantially equivalent concepts of Personal Information and Personally Identifiable Information as defined in certain countries' applicable laws.

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or Processing Data about you, so that you are aware of how and why the Company is collecting and using such information.

Responsible for overseeing data protection compliance issues within the Company is the Company's Global Privacy Office ("GPO"). The contact information for the GPO can be found in the [Global Privacy Policy](#). If you have questions about this Privacy Notice, you may contact the GPO.

Data Protection Principles

The Company complies with the following principles relating to the Processing of Personal Data, to ensure that your Personal Data held by the Company is:

- Used lawfully, fairly, and in a transparent way;
- Collected only for valid purposes that are clearly explained, and not used in any way that is incompatible with those purposes;
- Adequate and relevant to the purposes the Company has disclosed to you, and limited only to those purposes;
- Accurate and kept up to date to the extent necessary;
- Kept only for as long as necessary for the purposes the Company has disclosed to you; and
- Kept securely, with protection against unauthorized or unlawful Processing.

Types of Personal Data Held by the Company

In order to employ you or contract with you, to administer the recruitment process with you, and to fulfill all its employment related obligations (if applicable) under applicable local regulations and within the permissions of locally applicable laws, the Company will need to collect, generate, store, use, process and retain the following categories of Personal Data about you during the recruitment process: (examples listed for certain categories may not be exhaustive):

- Personal contact details, such as name, title, addresses, telephone numbers, and personal email addresses;
- Date and place of birth;
- Citizenship;
- Government issued ID;
- Bank account details for purposes of expense reimbursement;
- Recruitment information (including copies of right to work documentation or immigration status documents and passports, references, and other information included in a Curriculum Vitae (CV) or cover letter or obtained as part of the application process);
- Employment records (including job titles, work history, working hours, training records and professional memberships and information from your named referees);
- Photographs and profiles;
- Visa number

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In certain cases and for specific purposes including regulatory compliance, and subject to the legal requirements applicable in the country where you are located, the Company may also need to Process or collect Data that is more sensitive and falls within the definition of special categories of Data. The types of special categories of Data, which require a higher level of protection, may include (but are not limited to):

- Information about your gender, race, religion, ethnic or national origin
- Trade union membership;
- Information about your health, including any physical or mental condition or disability, health and sickness records, and doctor notes, including medical reports or requests for accommodations;
- Information related to your use of personal social media, in particular information that you have manifestly made public; and
- Information about criminal convictions and offences, which may include civil litigation and conduct checks, credit checks.
- Information on individuals holding or having held national security clearances and access to classified government information for employment roles with such requirements
- Military or veteran status

The Company will only collect and Process information relating to criminal convictions or offenses where it is:

- For the protection of corporate values, interests and assets
- necessary to fulfil the Company's legal obligations;
- relevant for your role with the Company;

Data is collected directly from you or through you from the information you provide as part of your application or interview, or from an employment agency or background check provider. The Company may sometimes collect additional information from third parties, including former employers and referees or credit reference agencies.

Should the Company need to collect any additional Data not listed in the above categories, specific supplemental notice will be provided prior to or at the time of collection.

The Company's Data Processing

After receiving your CV and other application information, the Company will review it to determine whether to proceed further in the hiring process. If you are offered a role with Broadcom, the Company may process elements of your Data to the extent they are relevant to, and necessary for, the following categories of purposes:

- **Hiring and staffing:**
 - Making decisions about your recruitment or engagement;
 - Making hiring decisions, resource planning, skills allocation;
 - Undertaking employment screening to assess your suitability for a role;
 - Checking of references
 - Verifying the accuracy of the claims you make about your qualifications
 - Checking that you are legally entitled to work;

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- Communicating with you during the recruitment process
- Determining the terms and conditions of your employment or engagement;
- Liaising with benefit providers, pension providers, insurers or agents;
- Making decisions about salary and compensation
- Assessing qualifications for a particular job or task,
- Complying with health and safety regulations;
- Compliance with contractual or regulatory requirements

From time to time, specific elements of your Data may be extracted and processed to derive aggregated or non-identifiable statistical information for the purposes of conducting data analytics studies to review and better understand employee retention and attrition rates, and to conduct equal opportunities monitoring and reporting.

The Company will Process Data about you on the grounds of “Lawful Bases” under the GDPR or equivalent local laws and regulations (discussed further below), as well as where such Processing is otherwise required or permitted by law.

Legal Grounds for the Company’s Processing of your Personal Data

Under the GDPR or equivalent local laws and regulations, data controllers are only permitted to Process Personal Data on the grounds of pre-defined “Lawful Bases”. Set out below is each Lawful Basis that may apply to the Company’s Processing of your Personal Data, depending on the context and purpose of the Processing activity:

- Where you have voluntarily provided your information and explicitly consented to its processing
- To decide whether the Company wants to enter into a contract with you;
- Where the Company needs to comply with a legal obligation;
- Where the Company needs to protect your vital interests (or someone else’s vital interests); and
- Where the Processing is necessary for the Company’s or a third party’s legitimate interests (see further explanation below) and your interests and fundamental rights do not override those interests.

The Lawful Bases upon which the Company will Process special categories of Data as and where necessary are:

- The Company’s regulatory compliance obligations, in particular with health and safety regulations;
- The Company’s regulatory obligations and specific rights as a data controller in the field of employment;
- Legally defined public interest, such as for equal opportunities monitoring or in relation to the Company’s occupational pension scheme, or where it is needed to assess your working capacity on health grounds; and
- In exceptional and limited circumstances and only where applicable, your explicit consent.

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Less commonly, the Company may process special categories of Data where it is needed in relation to legal claims or to protect your vital interests (or someone else's vital interests – for example, health and safety) while you are not capable of giving your consent, or where you have already made the information public.

The Company's Legitimate Interests

As noted above, one Lawful Basis for the Processing of Personal Data is when such Processing is necessary for the Company's "legitimate interests." These include in particular:

- Deciding whether to make an offer or employment to you
- The furtherance of the Company's business operations, including human resources, IT, finance, and other administrative functions and initiatives;
- The pursuit or defense of any claims, rights, or litigation;
- The detection or investigation of criminal activities affecting the Company;
- Accounting or auditing functions and reporting duties;
- Ensuring the security of the Company's information networks and systems;
- The protection of the Company's intellectual property rights, confidential information, security or product development;
- Monitoring and ensuring compliance with policies, processes and procedures, such as security, fraud prevention, employee benefits, and training.

Where the Company relies on legitimate interests to Process your Data for the above specified purposes, the fair and appropriate balance between such legitimate interests and the interests and fundamental rights and freedoms of employees may be established through a privacy assessment and protected by adequate safeguards, including as the case may be through consultation with employees or their representatives.

Consent to Process your Data

In general, as long as the Company is using your Data as set out in this Privacy Notice, your consent to the Processing is not required. In limited circumstances, the Company may request your specific consent to Processing your Data for optional purposes that are to your benefit, or to allow the Processing of certain particularly sensitive Personal Data. If the Company does so, it will provide full details of the information requested and why it is needed, so that you can carefully consider whether to give consent. You should be aware that it is not a condition of any employment offer that you agree to any request for consent.

Sharing Data within the Company and with Third Parties

Your Data may be shared between legal entities within the Company. In addition, the Company may share your Data with third parties, including service providers. The Company does not engage in Processing your Data for commercial purposes or in selling it.

Data Sharing Between Company Entities

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Your Data may be shared with and Processed by different legal entities within the Company. For example, your Data may be transferred between the entity that employs you and a different Company entity so that it can be maintained in the Company's global human resources information system of records (e.g. Workday). This could result in your Data being Processed outside of the European Economic Area ("EEA"). For more information, please see below.

Your Data may also be shared between Company legal entities as part of the Company's regular reporting activities on Company performance, human resources matters, in the context of a business reorganisation or corporate restructuring exercise, or for system maintenance support and hosting of Data.

Data Sharing With Third Parties

The Company will only share your Data with third parties outside of the Company where:

- It is required by law;
- It is necessary to administer the recruitment process; and/or
- There exists another specific legitimate interest to do so.

In particular, the Company will share specific subsets of your Data with select third parties, as necessary and relevant to the recruitment purposes, to the extent that the corresponding Processing is carried out by those third party service providers, or where sharing the data with the third party is required to comply with the Company's legal obligations, or for the furtherance of the Company's legitimate interests.

- Accounting, human resources, benefits and payroll services;
- Legal services;
- Recruitment;
- Travel services;
- Works Councils and Unions

The recipients of the Data will typically be, as relevant:

- The Company's human resources information systems providers (e.g. Workday);
- Legal counsel and other authorised legal representatives appointed by the Company;
- Competent industry and public regulators and professional bodies;
- National, government or statutory bodies competent in labor matters;
- Recruiters or reference checking agencies;
- Criminal records or other background checking agencies;
- Payroll and benefits providers;
- Pension providers, insurers, or other insurance providers (including brokers);
- Occupational health providers;
- Medical practitioners, clinicians, doctors, other health providers and consultants;
- Cloud service providers hosting Data and IT applications used for the Company's business purposes;

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- Clients or customers (where necessary for the purposes of assessing suitability for a project or specific piece of work);
- Training providers or organisations;
- Travel agencies;
- Consultants or contractors and providers of professional services working on the Company's behalf; as well as
- Employment agencies and
- Works Councils and Unions

All legal entities and third parties to whom Data is transferred are required to take appropriate security measures to protect your Data, in line with the Company's policies. They are only permitted to Process your Data for specified purposes and in accordance with the Company's written instructions.

Where local legislation requires your consent to disclose your data to third parties, your consent deemed given by your employment agreement, including acceptance of the Company's policies and procedures.

International Data Transfers

In order to perform its obligations as an employer and to work with the third parties, including but not limited to, Company entities mentioned above, the Company may engage in international transfers of your Data. To ensure that your Data receives the same level of protection when engaging in international transfers, the Company has put in place the following protective measures:

- EU Standard Contractual Clauses for the international transfer of personal Data (controller to processor transfers);
- Intercompany Agreements, with EU Standard Contractual Clauses for the international transfer of personal Data (controller to controller transfers);

You may request a copy of the applicable safeguards by contacting the GPO.

Where local legislation requires your consent to perform international data transfers, your consent is deemed given by your employment agreement, including acceptance of the Company's policies and procedures.

Data Security and Data Breaches

A Data breach is a breach of security leading to the accidental, unauthorized, or unlawful access, disclosure, destruction, loss, or alteration of Personal Data. The Company has put in place appropriate security measures to prevent Data breaches. Details of these security measures may be obtained from the GPO. In addition, the Company limits access to your Data to those employees, contractors and third parties who have a business need to access it. Such parties will only process your Data on the Company's instructions and/or are subject to a duty of confidentiality.

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The Company has put in place procedures to respond to a Data breach and will notify you and any applicable regulator of a breach without undue delay where legally required or deemed relevant.

Data Retention

The Company will keep your Data for no longer than is necessary for the purposes for which it is collected or processed. The criteria used to determine retention periods or whether Data can be purged will depend, among other things, on the ongoing need for the information as well as the legally mandated retention periods, and whether the information is subject to a document preservation order due to current or anticipated litigation or other legal claims. In general, Data will be removed in accordance with our Record Retention and Destruction Policy, if it has been superseded by more relevant or up to date information, or if it is out of date, irrelevant, or no longer necessary

In some circumstances the Company may anonymise Data so that it can no longer be associated with you, in which case the Company may use such Data without further notice to you.

Your Rights In Relation to your Data

Under the circumstances laid down by the applicable laws and regulations, you have the right to:

- **Obtain confirmation** as to whether your Data is being processed by the Company, and, if so, obtain information related to this Processing (commonly known as a “Data Subject Access Request”).
- **Receive a copy** of your Data, where the rights and freedoms of others are not adversely affected, and unless you already possess a copy of that data.
- **Request erasure** of your Data where lawful grounds apply. This enables you to ask the Company to delete or remove Data where:
 - It is no longer necessary for the purposes for which it was collected or otherwise processed;
 - You withdraw consent (if this is the basis on which your Data was or is being processed);
 - It is unlawfully processed;
 - The Company is obligated to do so in order to comply with applicable laws;
 - You have successfully exercised your right to object to Processing (see below).
- **Request correction** or rectification of inaccurate or incomplete Data.
- **Object to further Processing** of your Data where the Company is relying on a legitimate interest for Processing, unless such interest is so compelling as to override your objection.

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- **Request restrictions on the Processing** of your Data when lawful grounds to do so apply (e.g. the Company no longer needs the Data for its business purposes, but it is legally obligated to retain it).

If you would like to review, verify, correct, or request erasure of your Data, object to its Processing, or request that the Company transfer a copy of your Data to another party, please submit a request using the Company's [Data Subject Request Portal](#). Should that not be available or applicable to you, please contact the GPO in writing. The Company may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

You also have the right to lodge a complaint about the Company's Processing of your Data with the supervisory authority of your country of residence. However, before lodging a complaint with authorities, you are encouraged first to raise your concerns with the Company's GPO who will help seek an acceptable resolution.

Providing Up-to-Date Data


You are required to provide the Company with certain Data. If you fail to provide requested Data accurately and in a timely manner, this may impact the Company's ability to comply with its legal obligations or it may prevent the Company from moving forward in the application/hiring process.

Changes to this Privacy Notice

The Company reserves the right to update this Privacy Notice at any time, and will post an updated Privacy Notice when substantial changes are made.

Approved By:

Date:

Ilias Chantzios Global Privacy Officer	<div>DocuSigned by:  19C712194CF34AD...</div>	May-19-2023
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Privacy Notice and Policy for Candidates of Employment**Revision History**

Revision	Date	Change Description
1	03/12/2021	Updated terms to adjust to regulatory developments since previous version of May 2018.
2	05/19/2023	Updated title, clarified scope and international data transfers and added some smaller amendments