

Globant

Applicant Privacy Notice and Notice at Collection

Last Updated: April 22, 2024

This Applicant Privacy Notice ("Notice") describes how Globant S.A., its affiliates, and subsidiaries, ("Globant," "we," "us," "our") collects and uses Personal Information relating to our external job applicants and potential candidates and is intended to satisfy our notice at collection and privacy policy requirements under applicable privacy regulations.

The information in this Notice is intended to provide an overall description of our processing of Applicant Personal Information. The Personal Information that we collect, use, and disclose may vary depending on the circumstances, such as the position(s) or location(s) for which you apply and the associated qualifications and responsibilities. In addition, if you visit one of our offices or locations, we may collect Personal Information as part of our onsite security.

We may provide Applicants additional notices about our data practices, such as those covered by other laws. We encourage you to carefully read this Notice, together with any other notices we may provide you. If you are a California resident, please review our [California Notice at Collection and Privacy Rights](#).

1. Scope

This Notice applies, generally, to the Applicant Personal Information that we collect and otherwise process about Applicants in the context of reviewing, assessing, considering, managing, storing, or processing their applications or otherwise considering them for a position with us. Your use of our website or submission of an application or other information through our website is subject to our terms, which include terms governing limitations on liability and the resolution of disputes.

In this Notice, "Personal Information" is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you.

This Notice does not apply to the Personal Information we collect from contractors or employees, which is subject to different privacy notices, or to the Personal Information we collect about our customers, which is subject to the Globant Privacy Policy (<https://www.globant.com/privacy-policy>).

2. Personal Data We Collect

While the personal data we collect varies depending upon our interactions with you, we may collect personal data from you, from third-party sources, and automatically in the following circumstances:

Personal Data Collected Directly from You. We may collect the following personal data from you:

- **User account.** When you create an account to access our Career Site, we may collect your username, contact information, age, gender (if you choose to disclose), CV, educational and professional background, reference information, information regarding any accessibility requests you may choose to make, as well as other information you choose to disclose.
- **Application process.** When you contact us to send us a job application, we may collect your contact information, educational and professional background, performance information, professional membership records, referrals, assessment records, resumes, cover letters, and work history, conduct information (including disciplinary and grievance records), legally required background checks (including OFAC sanctions checks) and termination data.

- **Communications and Interviews.** We collect the information you provide such as contact information and records of our communications as well as records of our interviews with you.
- **Surveys.** When you fill out a survey, we collect your response, which depends on the type of survey, but may include contact information and your satisfaction with the process.
- **Events.** We also collect personal data related to your registration for and participation in events we host or sponsor.
- **Image / video recording and transcripts.** Your image may be captured and/or recorded on video security/monitoring systems when you enter Globant premises, and/or audio video recording and transcription during meetings.
- **Other Information.** We may collect other personal data that you consent to or would reasonably expect based on the nature of the circumstances.

Personal Data Collected from Third Parties. We may collect personal data about you from third party sources such as recruiters, recruiting and social media platforms, referrals and references, former employees, other employees, publicly available information and data brokers, service providers, representatives, agents, affiliates, and subsidiaries.

Personal Data Collected Automatically. When you visit our Sites or Services, we and third parties may collect personal data including through the use of cookies, pixel tags, and other similar technologies such as:

- **Device and Browsing Information.** When you visit our Site, we may collect information, which may be considered personal data under certain laws, such as IP address, browser type, domain names, access times, date/time stamps, operating system, language, device type, unique or online identifier, Internet service provider, referring and exiting URLs, clickstream data, and similar device and browsing information.
- **Activities and Usage.** We also collect activity information related to your use of the Site, such as information about links clicked, searches conducted, features used, items viewed, time spent on certain pages, your interactions with us, log file information, and other activity and usage information.
- **Location Information.** We may also collect or derive general location information about you, such as through your IP address.

For more information please review [Section 7 Cookies and Other Tracking Mechanism](#) and our [cookie policy page](#).

3. How We Use Personal Data

Subject to applicable legal restrictions, we generally collect, use, disclose, and process Applicant Personal Information for the following purposes:

- **Creating and managing your account to access our Career Site:** to create your account and grant you access to our Career Site, manage your access to the Site and provide support regarding your access to the Site.
- **Recruiting, hiring, managing, and evaluating Applicants:** to review, assess, recruit, consider, or otherwise manage Applicants, candidates, and job applications, including related to:
 - o scheduling and conducting interviews,
 - o identifying candidates, including by working with external recruiters,
 - o reviewing, assessing, and verifying information provided, and otherwise screening or evaluating Applicants' qualifications, suitability, and relevant characteristics,

- o contacting Applicants' references of prior work experience,
 - o extending offers, negotiating the terms of offers, and assessing salary and compensation matters,
 - o satisfying legal and regulatory obligations,
 - o communicating with Applicants regarding their applications and about other similar position(s) for which they may be interested,
 - o maintaining Applicant Personal Information for future consideration, and
 - o in support of our equal opportunity employment policy and practices.
- ***Security and monitoring:*** to monitor and secure our resources, network, premises, and assets, including related to:
 - o detecting, preventing, investigating and responding to security and privacy incidents,
 - o managing physical and technical access controls,
 - o maintaining and reviewing access and activity logs and records, and
 - o ensuring the security and functioning of our systems and assets by securing our offices, premises and physical assets, including through the use of electronic access systems and video monitoring.
 - ***Contacting you about potential positions:*** to identify other positions for which an Applicant may be suited or interested and to contact Applicants about such positions. (If you do not wish to be contacted about potential positions, please let us know using the contact information below.)
 - ***Defending and protecting rights:*** to protect and defend our rights and interests and those of third parties, including to manage and respond to Applicant and other legal disputes.
 - ***Complying with legal obligations:*** relating to compliance with applicable legal obligations (such as hiring eligibility, background check requirements, responding to subpoenas, and court orders), assessments, reviews and reporting relating to legal obligations including under employment and labor laws and regulations, Social Security, immigration and tax laws.

4. Disclosures of Personal Data

In general, we disclose and make available personal data to third parties in the following ways:

- **Corporate Affiliates.** We may disclose personal data to corporate affiliates as part of our global business operations and for purposes and uses that are consistent with this Policy.
- **Processors and Service Providers.** We may disclose personal data to our service providers who perform services on our behalf such as recruiting agencies, vendors providing HR or recruiting services, IT service providers, hosting providers, email service providers, chat bot providers, call centers, etc.
- **Third Parties, Platforms, and Services.** We may disclose or make available personal data to third-party platforms and providers that we use to provide or make available certain features or portions of the Site and Services, or to facilitate communications with you, and as necessary to respond to your requests.
- **Third-Party Analytics Providers.** We may also engage third-party analytics companies to collect information about how you access and use our Site and Services, to improve our Sites and Services, and for other research and analytical purposes.
- **Compliance, governance and legal requirements.** We may disclose personal data to comply with legal and compliance obligations and to respond to legal process and related to legal

proceedings. For example, we may disclose personal data in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement. We may also disclose information, including personal data, related to litigation and other legal claims or proceedings, for our internal accounting, auditing, compliance, recordkeeping, and legal functions.

- **Business Transfers.** We may disclose personal data as part of commercial transactions (e.g., mergers, acquisitions, bankruptcy, or other similar business transactions) and in contemplation of such transactions (e.g., due diligence).
- **Business partners or clients.** We may disclose your personal data with partners or clients when necessary in order to staff a specific project.
- **Other Disclosures.** We may disclose your personal data for other purposes, which we will notify you of and/or obtain your consent when required.

Aggregate and/or Deidentified Data. We may use and disclose aggregate, deidentified, and other non-identifiable data related to our business, recruiting processes and the Services for quality control, analytics, research, development and other purposes. Where we use, disclose, or process deidentified data we will maintain and use the information in deidentified form and not to attempt to reidentify it except where permitted by law.

5. International Data Transfer

Given Globant's international presence, your personal data may be transferred within and out of the European Economic Area (EEA). Any international transfers of your personal information will be made in compliance with applicable laws and regulations regarding personal data protection as well as complying with all legal confidentiality and security obligations. Your personal data will not be shared with any third parties that do not have authorization for their processing.

To efficiently provide services, some of our service providers (data processors) are located in countries out of the EEA, or if located in the EEA, they may share information with entities out of the EEA.

When we transfer personal data outside of the EEA, to be processed by companies hired by Globant or affiliates or subsidiaries of Globant, we will comply with the EU General Data Protection Regulation and all applicable data transfer regulations. Specifically, all data transfers will comply with appropriate safeguards.

6. Legal Bases

We are entitled to use your personal data based on (i) our legitimate interest such as to ensure that we recruit the appropriate employees, to protect our legal rights and interests, to the extent that your interests or your fundamental rights are not overridden; (ii) your consent to do so for a specific purpose; or (iii) to process your data to comply with a legal obligation.

7. Cookies and Other Tracking Mechanisms

We and other third parties use cookies, pixel tags, and other similar tracking mechanisms to automatically collect information about browsing activity, device type, and similar information within our Site and Services. We use this information to, for example, analyze and understand how you access, use and interact with our Site and Services; to identify and resolve bugs and errors in our Site and Services; to assess, secure, protect, optimize, and improve the performance of our Site and Services; for marketing, advertising, measurement and analytics purposes; and to personalize content on our Site and Services. We may also deidentify or aggregate such information to analyze trends,

administer our Site and Services, gather broad demographic information for aggregate uses and for any other lawful purpose.

Cookies. “Cookies” are alphanumeric identifiers used for tracking purposes. Some cookies allow us to make it easier for you to navigate, while others are used to enable a faster log-in process, support the security and performance of the Site, or allow us to track activity and usage data within the Site and across websites.

Pixel Tags and Similar Technologies. Pixel tags (sometime called web beacons or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. We may use these tracking technologies to understand users’ activities, help manage content and compile usage statistics, and in emails to let us know when they have been opened or forwarded so we can track response rates and gauge the effectiveness of our communications.

Third Party Analytics. We use third party tools, such as Google Analytics, which are operated by third party companies to evaluate usage of our Site. These third-party analytics companies use cookies, pixels, and other tracking technologies to collect usage data about our Site to provide us with reports and metrics that help us evaluate usage of our Site, improve our Site, and enhance performance and user experience. To learn more about Google’s privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

8. Security

No data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot guarantee or warrant the security of any information collected through our Site and Services. You use our Site and Services and provide us with your personal data at your own risk.

9. How Long We Retain Your Personal Data

Globant retains the Personal Information we collect as reasonably necessary for the purposes described above or as otherwise disclosed to you at the time of collection. For example, we will retain your Personal Information as necessary to comply with our tax, accounting, and recordkeeping obligations, to consider you for additional positions, and as necessary to protect, defend or establish our rights, manage potential claims, prevent fraud, address security issues, and comply with our legal obligations. If you request we delete your personal data from our databases, please note we may still retain your personal data as necessary to comply with our legal obligations, regulatory requests, resolve disputes, and enforce our agreements.

10. Your Privacy Choices

Recruiting and job offers. We may send periodic promotional emails or other similar communications to you regarding potential job offers. You may opt-out of these communications by following the instructions provided to you in the communication, such as using the “unsubscribe” option. If you opt-out of receiving promotional content from us, we may still send you communications about your account or any Services you have requested or received from us.

Industry Ad Choice Programs. You can also control how participating third-party ad companies use the information that they collect about your visits to our Site and those of third parties, in order to display more relevant targeted advertising to you. If you are in the U.S., you can obtain more information and opt-out of receiving targeted ads from participating third-party ad networks at

aboutads.info/choices (Digital Advertising Alliance). You may also download the DAA AppChoices tool in order to help control interest-based advertising on apps on your mobile device.

Cookie Settings. You can adjust your cookie settings by clicking “Cookie Preferences” in the footer of our website. Visitors to our Site who disable cookies will be able to browse the Site, but some features may not function. If you come to our Site from a different device or from a different browser on the same device, you will need to apply your cookie settings for that browser and/or device as well.

Browser Signals. To the extent required by applicable law, if our Site detects that your browser is transmitting an opt-out preference signal, such as a “global privacy control” (or GPC) signal, we will apply that signal to opt that particular browser on your device out of targeting cookies on our Site. If you come to our Site from a different device or from a different browser on the same device, you will need to apply GPC for that browser and/or device as well. We do not respond to do not track signals.

11. Personal Data of Minors

We provide a general audience Site. The Site and Services are not designed for minors, and we do not knowingly collect personal data from minors.

12. External Links

Our Sites and Services may contain links to third-party websites or features. Any access to and use of such linked websites or features is not governed by this Policy, but instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third parties, including their collection of your personal data. You should review the privacy policies and terms for any third-party websites before proceeding to those websites or using those features.

13. California Notice at Collection and Privacy Rights

This section of the Policy (the “California Notice at Collection and Privacy Rights”) provides additional information for California residents (“you”) and describes our information practices pursuant to applicable California privacy laws, including the California Consumer Privacy Act and the regulations issued thereto, each as amended (the “CCPA”).

In this section, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This section does not address or apply to our handling of publicly available information or Personal Information that is otherwise exempt under the CCPA. This Notice does not address or apply to our collection of Personal Information that is not subject to the CCPA, such as consumer credit reports and background checks, publicly available data, or other information that is exempt under the CCPA.

Categories of Personal Information Collected and Disclosed

The table below identifies, generally, the categories of Personal Information about Applicants that we collect and have collected in the prior twelve (12) months, as well as the categories of third parties to whom we may disclose this information for a business or commercial purpose. In some cases (such as where required by law), we may ask for consent or give you certain choices prior to collecting or using certain Personal Information. For more information, please see Section 3 How We Use Personal Data and Section 4 Disclosures of Personal Data sections above.

Categories	Description	Third Party Disclosures for Business or Commercial Purposes

Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, and other identifiers, username.	<ul style="list-style-type: none"> • regulators, government entities, and law enforcement • affiliates, advisors, and agents • data analytics providers • social networks • internet service providers, operating systems, and platforms • others as permitted by law
	Driver's license number, passport number, and other government identifiers.	<ul style="list-style-type: none"> • regulators, government entities, and law enforcement • affiliates, advisors, and agents • others as permitted by law
Internet or Other Electronic Network Activity Information	Internet or other electronic network activity information including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet website or application, physical and network access logs and other network activity information related to your use of any Globant device, network or other information resource.	<ul style="list-style-type: none"> • affiliates, advisors, and agents • regulators, government entities, and law enforcement • internet service providers, operating systems, and platforms • others as permitted by law
Geolocation Data	Location information derived from a device.	<ul style="list-style-type: none"> • affiliates, advisors, and agents • internet service providers, operating systems, and platforms • others as permitted by law
Characteristics of Protected Classifications Under California and Federal Law	Gender identity (if you choose to disclose), age, and other characteristics of protected classifications under California or federal law.	<ul style="list-style-type: none"> • affiliates, advisors, and agents • regulators, government entities, and law enforcement • data analytics providers • internet service providers, operating systems, and platforms • others as permitted by law
Audio, Electronic, Visual, Thermal, or Similar Information	Audio, electronic, visual, or similar information such as, video footage, photographs, call recordings, and other audio recordings (e.g., recorded webinars or interviews), and thermal screenings.	<ul style="list-style-type: none"> • affiliates, advisors, and agents • regulators, government entities, and law enforcement • advertising networks and data analytics providers • social networks • internet service providers, operating systems, and platforms • others as permitted by law
Professional or Employment-related Information	Performance information, professional membership records, references, assessment records, resumes, cover letters, and work history, conduct	<ul style="list-style-type: none"> • affiliates, advisors, and agents • regulators, government entities, and law enforcement • data analytics providers

	information (including disciplinary and grievance records), and termination data.	<ul style="list-style-type: none"> • social networks • internet service providers, operating systems, and platforms • others as permitted by law
Education Information	Degrees earned, educational institutions attended, transcripts, training records, and other information about your educational history or background that is not publicly available personally identifiable information as defined under the Family Educational Rights and Privacy Act.	<ul style="list-style-type: none"> • affiliates, advisors, and agents • regulators, government entities, and law enforcement • advertising networks and data analytics providers • social networks • internet service providers, operating systems, and platforms • others as permitted by law
Sensitive Personal Information	Such as: (a) driver's license, state identification card, passport, or other government identifiers; (b) financial account and payment information; and (c) health information (e.g., as necessary to provide reasonable accommodations).	<ul style="list-style-type: none"> • regulators, government entities, and law enforcement • affiliates, advisors, and agents • others as permitted by law

Sales and Sharing of Personal Information.

The CCPA defines “sale” as disclosing or making available personal information to a third-party in exchange for monetary or other valuable consideration, and “sharing” includes as disclosing or making available personal information to a third-party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, we may “sell” or “share” the following categories of personal information: identifiers and Internet and network activity information. We may disclose these categories to third-party advertising networks, data analytics providers, or social networking sites for purposes of marketing and advertising and to improve and measure and analyze our ad campaigns. We do not knowingly sell or share: Sensitive Personal Information or Personal Information about individuals under sixteen.

Sources of Personal Information

In general, we may collect the Applicant Personal Information identified in the table above from the following categories of sources: directly from you, recruiters, recruiting and social media platforms, referrals and references, former employees, other employees, publicly available information and data brokers, service providers, representatives, agents, affiliates, and subsidiaries.

Retention

Globant retains the Personal Information we collect as reasonably necessary for the purposes described below or as otherwise disclosed to you at the time of collection. For example, we will retain your Personal Information as necessary to comply with our tax, accounting, and recordkeeping obligations, to consider you for additional positions, and as necessary to protect, defend or establish our rights, manage potential claims, prevent fraud, address security issues, and comply with our legal obligations.

How We Use Personal Information

As more fully described in the [Section 3 How We Use Personal Data](#), we collect, use, and otherwise process the above categories of Personal Information for recruiting and hiring purposes, to respond to and fulfill your requests, as otherwise directed or consented to by you, and for the following business and commercial purposes: to provide Services and support, communications, analytics and improvement, customization and personalization, marketing and advertising, events, research and studies, security and the protection of rights, legal proceedings and obligations, and general business and operational support.

Sensitive Personal Information

We use and disclose Sensitive Personal information about Applicants as reasonably necessary and proportionate: to perform our services requested by you; to prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and/or confidentiality of stored or transmitted Personal Information; to resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for those actions; to ensure the physical safety of natural persons; to verify or maintain the quality and safety of our services; for compliance with our legal obligations; and for purposes other than inferring characteristics about you.

Your CCPA Rights

California Applicants have certain rights under the CCPA with respect to their Personal Information, subject to certain limitations and exceptions.

- **Know/Access**: the right to know what Personal Information we have collected, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected.
- **Deletion**: the right to request deletion of the Personal Information that we have collected about you.
- **Correction**: the right to request correction of inaccurate Personal Information that we maintain about you.
- **Opt-Out of Sales and Sharing**: You have the right to opt-out of “sales” and “sharing” of your Personal Information, as those terms are defined under the CCPA. To exercise your right to opt-out of the “sale” or “sharing” of your Personal Information, please visit our Cookie Preferences link at the bottom of our Site. Please note that submitting an opt out request will only opt you out of disclosures that are considered “sales” or “sharing” under the CCPA and will not opt you out of other disclosures, such as to our service providers.

You also have the right to opt-out of “sales” and “sharing” of your personal information through the use of an opt-out preference signal. If we detect that your browser or device is transmitting an opt-out preference signal, such as the “global privacy control” or “GPC” signal, we will opt that browser or device out of cookies that result in a “sale” or “sharing” of your personal information. If you come to our website or use our services from a different device or from a different browser on the same device, you will need to opt-out or use an opt-out preference signal for that browser and/or device as well.

- **Limit Use and Disclosure of Sensitive Personal Information:** the right to request we limit certain uses and disclosures of Sensitive Personal Information. However, we do not use Sensitive Personal Information for purposes that would trigger this right.

Submitting CCPA Requests. Applicants may be able to exercise many of these rights themselves by logging into the Applicant portal. Otherwise, you or your authorized agent may submit a request via email to privacy@globant.com.

We will take steps to verify your request by matching the information provided by you with the information we have in our records.

In some cases, we may request additional information in order to verify your request or where necessary to process your request. Authorized agents may initiate a request on behalf of another individual through one of the above methods; authorized agents will be required to provide proof of their authorization, and we may also require the relevant Applicant to directly verify the identity and the authority of the authorized agent.

14. Brazilian Privacy Statement

Data collected and/or processed in Brazil, or other data processed in relation to people and/or Services located in Brazil, shall be also subject to the provisions of Brazilian General Data Protection Law (Law nr. 13.709/2018 – Lei Geral de Proteção de Dados Pessoais or LGPD). Any requests regarding data protection in Brazil shall be directed to the email privacy@globant.com. Our person “in charge” (encarregado, in accordance with Art. 41, §1º, LGPD) is Mr. Bryan Longo, lawyer at Clasen & Casado Filho Sociedade de Advogados.

15. Contact Us About This Notice

For additional details, or if you have questions regarding our use of your personal information as described in this Notice, you may contact us at privacy@globant.com.