

Avanade Recruitment and Hiring Privacy Statement

Scope and application

If you use Avanade's online career resources, we collect and process your personal data for recruiting-related purposes.

We may also use Cookies and other tracking technology and the same technologies we use for Marketing (including Customer Relationship Management (CRM) Databases, Targeted E-mail & Combining and Analyzing Personal Data) to provide individuals with a personalized online experience, to send relevant information about careers and opportunities at Avanade, and to analyze the effectiveness of our recruitment efforts and resources.

More information about how your data will be used by Avanade during the recruitment process can be found below, or at the Careers website.

Introduction / who is collecting your personal data?

When you apply for a job at Avanade, Avanade will collect and use personal data about you during the recruiting and any hiring process. As described in this Privacy Statement, your personal data may be retained and used by Avanade for the purposes set out in the section "[What will Avanade do with your personal data?](#)" below. Please see below for information that Avanade may receive about you from third parties.

"Avanade" or "we" means the specific Avanade affiliates and subsidiaries who will collect, use, and maintain your personal data in connection with your application for employment, our Recruiting, Talent Management processes, and any hiring process if you are extended an offer of employment. Any Avanade entity located outside the European Union will be represented by Avanade Inc.

A full list of Avanade entities by country and their contact can be found [here](#).

What personal data will Avanade collect?

The types of information requested from you and the manner in which that information is collected and accessed are determined by the requirements of the country in which the position is located, and not the country in which you reside.

The following categories of data will be collected by Avanade:

- Your personal details;
- Data you submit in résumés / CVs, letters, writing samples, or other written materials;
- Data generated by interviewers and recruiters, based on their interactions with you or basic Internet searches;

- Data provided by third-party placement firms, recruiters, or job-search websites, where applicable;
- Recommendations provided on your behalf by others;
- Documentation required under immigration laws;
- Data about your prior employment, education, and where applicable, credit history, criminal records or other data revealed during background screenings;
- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation, subject to legal limits on the timing of collection of such data and other applicable limitations.
- Data about race / ethnicity / religion / disability / gender and self-identified LGBT status, for purposes of government reporting where required, as well as to understand the diversity characteristics of the Avanade workforce.

One way that we collect information is through the use of cookies. Cookies are small files of information that save and retrieve information about your visit to our tools and websites. Please read our [cookies policy](#) for further information on this.

You are not required to provide any requested information to Avanade, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.

You may read this Statement at any time by logging into the system with your user name and password. By submitting your information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.

What will Avanade do with your personal data?

Avanade will use your personal data for the following purposes and on the following legal bases:

| Purpose | Legal basis |
|--|---|
| Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available. | Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees. |
| Manage your application. | Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees. |
| Facilitate communication with you. | Justified on the basis of Avanade's legitimate interests of ensuring proper communication within the organization and with you. |
| Perform administrative functions (e.g. reimburse | Justified on the basis of Avanade's legitimate |

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|--|--|
| you for interview-related expenses). | interests of ensuring that it recruits the appropriate employees. |
| Perform data analytics, including analysis of our applicant pool in order to better understand who is applying to positions at Avanade and how to attract top talent. | Justified on the basis of Avanade's legitimate interests of ensuring that it continually improves its recruitment processes. |
| In some cases, record your online interview for review by additional recruiters and hiring managers. | Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees. |
| If you register on our Careers website, we will enter you into a database to receive future mailings about Avanade positions and events. | Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees. |
| Transfer your contact information (only) to the Avanade Careers system—a site that we maintain to notify you about new positions that may be of interest to you. Your contact information will be used by the Avanade Talent Acquisition Team to send you one invitation to sign up for future position alerts and invitations to Avanade recruiting events, as well as one follow-up reminder. If you do not respond to these messages your contact information will be retained by the Avanade Talent Acquisition Team only for the purpose of ensuring that we do not contact you again. If you join the Avanade Careers system you will have future opportunities to opt-out of receiving messages and alerts if you choose. | Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees. |
| Perform any legally-required reporting, and respond to legal process. | Compliance with a legal obligation. |

Where the above states that we rely on our legitimate interests for a given purpose, we did consider your potential interests, fundamental rights and freedoms and if those could be impacted by our processing activities. We did balance your interests, rights and freedoms against our interests, taking into account the processing, the security of your data and our existing relationship with you. Based on this balancing test and with our efforts to inform you in a very transparent way of the processing activities, we are of the opinion that it does not materially impact any of your interests, rights and freedoms by processing your data. Please contact us if you wish to obtain further information on the balancing test we performed.

Where you previously provided consent, we will process your personal data for the purposes mentioned in the table above on your prior consent, to the extent such consent is mandatory under applicable law.

Avanade will not use your personal data for purposes that are incompatible with the purposes listed in this Privacy Statement, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

From what sources will Avanade obtain your personal data?

Avanade may obtain data about you from the following sources:

- From you, when you submit resumes or other information online;
- From other Avanade affiliates;
- From conversations with recruiters and interviews with hiring managers and other Avanade personnel or representatives, some of which may be recorded as well as from Internet searches that these individuals may perform, or data that they may obtain from job search or professional networking websites (e.g. monster.com, LinkedIn, etc.) where you may have made data about yourself publicly available;
- From previous employers;
- From third-party recruiters, staffing companies, or websites where you are introduced to Avanade through one. Avanade does not accept unsolicited resumes from 3rd party recruitment agencies, but does sometimes use such agencies subject to a written agreement. Any resume or other candidate information submitted outside of established candidate submission guidelines (including through the Careers website or via email to any Avanade employee) and without a written agreement or otherwise will be deemed to be provided for Avanade's use, and no fee will be paid should the candidate be hired by Avanade; and
- From background checks, as applicable. Where permitted by law, Avanade may contract with a third party to perform a pre-employment background screening. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. You will receive more information about the nature of such a background check before it begins. Where required by applicable local law, you may be asked to provide certain background check information, (which may include sensitive data) directly to Avanade.

These sources are private sources, unless where the source is expressly stated to be "public". Note that these sources may have been holding your personal data both inside and outside the EU.

Who will have access to your personal data? Where are they located?

In general, access to your personal data will be restricted to minimize the number of people in Avanade's global organization who need it for the purposes set out in this Privacy Statement, which may include your potential future managers and their designees, personnel in HR, IT, Compliance, Marketing, Legal, Finance and Accounting and Internal Audit.

As a global organization with global IT systems, your personal data may be transferred to other Avanade offices in Avanade's worldwide organization. Avanade has internal policies to ensure an equivalent level of protection is in place across Avanade's worldwide organization. Any transfers of your personal data to other Avanade offices (including transfers from within the European Economic Area (EEA) to outside the EEA) will be governed by Avanade's inter- company data transfer agreements. A list of the Avanade offices that may process your personal data, and their contact information, can be found [here](#).

Furthermore, where there is a need, Avanade may share your personal data with third parties, such as third party service providers (including Adobe) and public authorities. Before doing so, Avanade takes steps to protect your personal data. Any service providers and professional advisors to whom your personal data are disclosed, are expected and required to protect the confidentiality and security of your personal data and may only use your personal data in compliance with applicable data protection laws. The following categories of third parties will have access to your personal data:

- Recruiters working with the country where the position you are applying for is based. Such individuals may be based in a different country;
- Hiring managers and other interviewers. Often these individuals will be based in the country where the position is based, but in some cases, they may be located in other countries;
- The global Avanade Talent Acquisition team, consisting of a limited number of individuals based in several countries;
- Individuals performing administrative and IT support functions;
- Authorized personnel at our service providers, including:
 - Those tools that currently or in the future hosts and supports the Avanade Talent Acquisition System and/or the Avanade Careers system;
 - Companies contracted to perform background screenings, where applicable. These companies may be based in another country, and may obtain data from other countries where you have lived, worked or studied, as may be relevant as part of a background check. You will receive more information about any such check before it begins;
- Government officials where legal reporting requirements may exist, or law enforcement agencies or private litigants in response to valid law enforcement process (warrant, subpoena, or court order); and
- A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Avanade business, assets or stock (including in connection with any bankruptcy or similar proceedings). A third party in connection with any proposed or actual client project.

Unless you are otherwise notified, any of your personal data from within the European Economic Area to third parties outside the European Economic Area (EEA) will be based on an adequacy decision or are governed by the standard contractual clauses. Any other, non-EEA originating, international transfers of your personal data, will take place in accordance with the appropriate international data transfer mechanisms and safeguards.

How long will Avanade retain my personal data?

If you are given and accept an offer of employment by Avanade, personal data collected during your pre-employment period will become part of your Avanade personnel records, to be retained throughout and for a period after your employment with Avanade. If Avanade does not employ you, Avanade may nevertheless continue to retain and use personal data collected during the recruitment process in order to consider you for new positions, and, if appropriate, to refer back to an earlier application if you submit a resume or other information to Avanade again in the future, as well as for system administration, to perform research and analysis, and to invite you to join the Avanade Careers system.

Avanade determines the retention period of your information based on the following retention criteria:

- Avanade retains your personal data as long as it has an ongoing relationship with you;
- Avanade retains your personal data where it is required to do so by a legal obligation to which it is subject;
- Avanade retains your personal data where this is advisable to safeguard or improve Avanade's legal position (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

How Avanade protects your personal data.

Avanade employs organizational, technical, and physical security measures in order to protect your data from loss or misuse. Where we contract with third-party suppliers to provide services that may enable them to access your personal data we require them by contract to have similar security controls in place.

How to obtain a copy of Avanade's internal Privacy Policy, request access to your personal data or contact us with questions or feedback.

If you have a question, comment, or complaint, wish to obtain more details on Avanade's Global Data Privacy Policy, you may contact us at AvanadeDPO@avanade.com.

If you want to exercise any of your rights in relation to your personal data please contact SubjectAccessRequest@Avanade.com

You have the right (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- request access to your personal data: this right entitles you to request access to personal data we process about you, as well as to certain information on such processing;
- request rectification of your personal data: this right entitles you to request the rectification or completion of any of your personal data that would be inaccurate or incomplete;
- request erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes;
- object to the processing of your personal data: this right entitles you to request that we no longer process your personal data;

- request the restriction of the processing of your personal data: this right entitles you to request that we only process your personal data in limited circumstances, including with your consent;
- request a copy or the portability of your personal data: this right entitles you to receive a copy of personal data that you have provided to us.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting Avanade's data protection team at AvanadeDPO@avanade.com. Please note that this will not affect Avanade's right to process personal data obtained prior to the withdrawal of your consent, or its right to continue parts of the processing based on other legal bases than your consent.

If, despite Avanade's commitment and efforts to protect your personal data, you believe that your data protection rights have been violated, you have the right at all times to lodge a complaint with a supervisory authority, either in the country where you live, the country where you work or the country where you deem that data protection law has been infringed.

You may also contact our Data Protection Officer at AvanadeDPO@avanade.com.

For job seekers from other countries:

This Privacy Statement is also available in the following languages:

- Bahasa Malaysia
- Brazilian Portuguese
- Chinese
- Dutch
- French
- German
- Italian
- Japanese
- Spanish
- Polish

In the event of any conflict between the English version and any translations of this Privacy Statement, the English version of this Privacy Statement shall prevail.

List of Avanade entities and their contact information

Further information on Avanade (and, if relevant, its representative) can be found below. Any Avanade entity located outside the European Union will be represented by Avanade Inc.

| Country of Incorporation | Legal Name | Address |
|--------------------------|---|---|
| Australia | Avanade Australia Pty Ltd | 48 Pirrama Road, Pyrmont, NSW, 2009 |
| Austria | Avanade Österreich GmbH | 4030 Linz, Dauphinenstraße 5, Austria |
| Belgium | Avanade Belgium SPRL | Medialaan 38 B-1800 Vilvoorde |
| Brazil | Avanade do Brasil Ltda. | Rua Bonnard, 980, Bloco 10, Andar 6. Alphaville -- CEP 06.465-134 City of Barueri, Sao Paulo, Brazil |
| Canada | Avanade Canada Inc. | 200 Wellington St. W., 10th Fl. Toronto, ON M5V 3C7 |
| Canada | Infusion Development Inc. (Canada) | c/o Avanade Canada 200 Wellington St. W., 10th Fl. Toronto, ON, M5V 3C7 |
| China | Avanade (Guangzhou) Computer Technology Development Co, Ltd | Unit 7, 10th Floor, HNA Tower, No. 8., Linhe Zhong Lu, Tianhe District Guangzhou Municipality People's Republic of China |
| Denmark | Avanade Denmark A/S | Arne Jacobsens Allé 15 DK-2300 København S Denmark |
| Finland | Avanade Finland Oy | Porkkalankatu 5 00180 Helsinki Finland |
| France | Avanade France SAS | Imm. Bords de Seine 1- 3, esplanade du Foncet, 92130 Issy les Moulineaux |
| Germany | Avanade Deutschland GmbH | Campus Kronberg 7 D-61476 Kronberg im Taunus Germany |
| Hong Kong | Avanade Hong Kong Limited | Room 1202, Unit 1, 12/F, International Commerce Centre 1 Austin Road West, Kowloon Hong Kong |
| Ireland | Avanade Ireland Limited | 3 Grand Canal Plaza, Grand Canal Street Upper, Dublin 4 |

| Country of Incorporation | Legal Name | Address |
|--------------------------|------------------------------------|---|
| Italy | Avanade Italy Srl | Via Roberto Lepetit 8/10, 20124 Milano, Italy |
| Japan | Avanade Japan K.K. | MFPR Roppongi Azabudai Building, 1-8-7, Roppongi, Minato-ku, Tokyo 107-8672, Japan |
| Malaysia | Avanade Malaysia Sdn. Bhd. | Suite 22.01, Level 22, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia |
| Netherlands | Avanade Netherlands B.V. | Orteliuslaan 1000 3528 BD Utrecht |
| Norway | Avanade Norway AS | Rolfsbuktveien 2, 1364 Fornebu, Norway |
| Poland | Avanade Poland sp. zo. o. | ul. Lubicz 23 A, 31-503 Kraków |
| Singapore | Avanade Asia Pte Ltd | 250 North Bridge Road #33-00 Raffles City Tower Singapore 179101 |
| Spain | Avanade Spain, S.L.U | Passeig Sant Gervasi, núm. 51 Planta 4, Modulo B 08022, Barcelona Spain |
| Sweden | Avanade Sweden AB | Alstromergatan 12 Box 12502 SE-102 29 Stockholm |
| Switzerland | Avanade Schweiz GmbH | Richtistrasse 11 8304 Wallisellen, Switzerland |
| United Kingdom | Avanade Europe Holdings Limited | 30 Cannon Street, London, EC4M 6XH |
| United Kingdom | Avanade Europe Services Ltd | 30 Cannon Street, London, EC4M 6XH |
| United Kingdom | Avanade UK Limited | 30 Cannon Street, London, EC4M 6XH |
| United Kingdom | Infusion Development UK Limited | c/o Avanade UK: 30 Cannon Street, London, EC4M 6XH |
| United States | Avanade Holdings LLC | Corporation Trust Center, 1209 Orange Street, City of Wilmington, County of Newcastle, DE 19801 |

| Country of Incorporation | Legal Name | Address |
|--------------------------|----------------------------|---|
| United States | Avanade International Corp | Corporation Trust Center, 1209 Orange Street, City of Wilmington, County of Newcastle, DE 19801 |
| United States | Avanade Inc. (US) | 818 Stewart Street, Suite 400 Seattle, WA 98101 |
| United States | InfusionDev LLC (US) | c/ Avanade Inc. 818 Stewart Street, Suite 400 Seattle, WA 98101 |