



## Global Professionals Privacy Notice

**Last Updated:** October 23, 2024

This Global Professionals Privacy Notice (“Privacy Notice”) explains how Qumulo, Inc. and its affiliates and subsidiaries (collectively, “**Qumulo**,” “**we**,” “**our**,” or “**us**”) collects, uses, discloses, and otherwise processes personal data about our job applicants and prospective employees (“**applicants**”), as well as current and former employees, officers, directors, contractors, freelancers, contingent workers, consultants, and other outsourced and temporary workers (collectively, “**professionals**”). It also explains how we collect, use, disclose, and otherwise process the personal data of our professionals’ family members or other individuals about whom we process personal data as a result of the relationships those individuals have with professionals (collectively, “**related persons**”). It is the responsibility of our professionals to make this Privacy Notice available to their related persons.

This Privacy Notice is not a contract and does not create any legal rights or obligations. This Privacy Notice also is not intended to replace other notices or disclosures we may provide to professionals in connection with their role in our organization, which will supersede any conflicting disclosures contained in this Privacy Notice.

### DATA CONTROLLER

Qumulo is the data controller of your personal data, and references to "Qumulo", "we" or "us" in this Privacy Notice are references to the Qumulo entity by which you are employed or otherwise engaged via a service contract. As the controller of your personal data, Qumulo is responsible for determining the purposes and means of data processing as described in this Privacy Notice. The table in [Annex 1](#) sets out the Qumulo entities.

### OUR COLLECTION AND USE OF PERSONAL DATA

#### Personal Data of Applicants and Professionals

##### *Collection of Personal Data*

In connection with an individual’s job application or role as one of our professionals, we collect the following professional or employment-related personal data:

- **Contact Information:** such as full name, email address (personal and work), home address, business address, telephone number and emergency contact information.
- **Background Check and Reference Check Information:** to the extent permitted by applicable law, we may choose to conduct a background check and/or a reference check in connection with an individual’s employment such as to verify professional and educational

history and qualifications or identify criminal history that may be relevant for a position with us. The results of the background check and/or reference check may include personal data we do not already have about the individual who is the subject of the check.

- **Identification Materials:** passport number, driver's license number, Social Security number or other government-issued identification number.
- **Education & Training Information:** such as employment history, education, professional qualifications, information that may be recorded on a resume/CV or application form, language abilities.
- **Financial Information:** such as salary information, financial information related to credit checks, bank details for payroll.
- **Benefits Information:** such as eligibility for benefits, information about family members and other related persons under the individual's benefits, and claims relating to the individual's benefits.
- **Demographic Information:** such as age, race, ethnicity, national origin, citizenship, sex, sexual orientation, religion, disability or accommodation request, or marital or veteran status when an individual chooses to provide it, but it will not be used in employment-related decisions unless specifically permitted by law.
- **Security Information:** such as work or applicant-related accounts and passwords, technical details about the individual's use of work-related devices and information systems (including, for example, device, logs, analytics data, IP address, and general location information derived from such IP address), the content of communications sent through work-related devices and information systems, access to physical and electronic work-related locations, audio recordings and photographs, videos and other visual images of the individual.
- **Other Information:** we also collect any personal data the individual chooses to share with us, such as in our communications with the individual, during the interview process, if the individual signs up for a contest or survey, information the individual posts to our Intra-Qumulo sites or makes publicly available, or that we receive from a third party in connection with the individual's work for us, a grievance the individual is involved in, an agreement the individual enters into with us or additional roles the individual takes on as a part of our organization.
- **CCTV Footage:** Qumulo may monitor its premises using CCTV cameras.

Although we often collect the personal data described above directly from the individual, we also collect this information from supervisors, colleagues, customers, vendors, publicly available sources, and other third parties the individual may interact with as a professional. In addition, we may also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, payroll providers and benefits providers.

Please note that some of the personal data described above may also be classified as "sensitive" or "special category" under certain privacy laws. For more information, please see the [Sensitive Information](#) section below.

#### *Use of Personal Data*

We use the personal data we collect about our applicants and professionals to:

- Conduct organizational planning and development, including budget planning and administration;

- Open and maintain applicant records;
- Process and assess your application, including assessing your suitability for a role;
- Analyze and monitor compliance with our policies and practices;
- Administer recruiting, onboarding, staffing, leave, evaluations, promotions, performance management, training, discipline, participation in available activities, or programs, and any other processing in connection with work-related purposes;
- Authorize, grant, administer, monitor (including by video surveillance) and terminate access to or use of company systems, facilities, records, property, and infrastructure;
- Communicate with and between applicants and professionals, as well as with designated emergency contacts;
- Support and manage applicants and professionals, including providing resources needed for the performance of their roles with us;
- Facilitate compensation, payroll, and benefit planning and administration (e.g., salary, tax withholding, insurance);
- Conduct performance reviews and evaluations, as well as make decisions about promotions and job mobility;
- Manage business travel (e.g., car service/rentals, flights, hotels) and expenses (e.g., reimbursement, corporate credit card).
- Operate our business, including marketing our professionals to customers, facilitating the work of our professionals and providing the products and services made available to our customers;
- Investigate, document and report work-related injuries, illness or grievances;
- Conduct internal investigations, audits, compliance, risk management, problem resolution, and security operations;
- Fulfill contractual obligations to professionals and other third parties;
- Comply with applicable law, rule, regulation, legal proceedings, and government investigations, including relating to tax reporting and immigration.

The table in [Annex 2](#) sets out further detail about the categories of personal data we collect about you and your Related Persons and how we use that information. The table also lists the legal bases we rely on to process each category of personal data.

## **Personal Data of Related Persons**

### *Collection of Personal Data*

At times, we receive identifiers and other personal data about our professionals' family members and other related persons in connection with emergency contacts and the benefits and services we provide. These identifiers and other personal data include:

- **Contact Information:** such as full name, email address, home address, business address, telephone number and emergency contact information.
- **Other Identification Materials:** such as image, Social Security number or other national identification number, passport number, or driver's license number.
- **Benefits and Services Information:** we also collect personal data necessary to extend benefits and benefit-related services, including insurance-related information, claims-related information, and disbursement-related information.

Although we often collect the personal data described above directly from our professionals, we also may collect this information directly from the related person, and from our benefit administrators. In addition, we may also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers. Please note that some of the personal data described above may also be classified as “sensitive” under certain privacy laws. For more information, please see the [Sensitive Information](#) section below.

#### *Use of Personal Data*

We use the personal data we collect about related persons to:

- Communicate about eligibility benefits and services, events or activities that are happening, or in the event of an emergency;
- Administer benefits and services;
- Respond to requests and inquiries;
- Conduct internal investigations, audits, compliance, risk management, problem resolution, and security operations;
- Fulfill contractual obligations;
- Comply with applicable law, rule, regulation, legal proceeding, and government investigations, including relating to tax reporting and immigration.

The table in [Annex 2](#) sets out further detail about the categories of personal data we collect about you and your Related Persons and how we use that information. The table also lists the legal bases we rely on to process each category of personal data.

## **OUR DISCLOSURE OF PERSONAL DATA**

We may share the categories of personal data outlined above with the following third parties for the purposes described below:

- **Within the Qumulo family of companies:** We share personal data relating to professionals and related persons within our family of companies for internal administrative purposes and uses that are consistent with this Privacy Notice. For example, the Qumulo entity responsible for payroll may receive personal data about professionals employed by another Qumulo entity in order to determine the proper compensation to be provided.
- **Displaying to Other Individuals:** When you post content to the Intra-Qumulo Site(s), other individuals may be able to see some information about you, such as your name and/or picture in addition to the content you post. We are not responsible for the practices of the individuals who view and use your information.
- **Benefit Administrators:** In order to provide our professionals and related persons benefits and services available to them, we share personal data with the third parties we engage to offer and administer benefits and services on our behalf. These third parties may also collect additional personal data directly from our professionals and their related persons in connection with these benefits and services, which will be subject to the relevant third party’s own privacy policies and notices.
- **Compensation, Payroll and Tax Providers:** We share personal data with third parties who assist us in processing our payroll and other compensation-related obligations, including our tax withholding and reporting obligations.

- **Other Vendors, Partners, and Service Providers:** In addition to the third parties identified above, we engage other third parties to perform certain functions on our behalf in connection with the uses of personal data described in the [Our Collection and Use of Personal Data](#) section above, including assisting us with our resource management, benefits and services offerings and other related business operations. Depending on the function the third party serves, the service provider may process personal data on our behalf or have access to personal data while performing functions on our behalf. Please see [Annex 3](#) regarding third-party service providers processing your personal data on our behalf.
- **Customers:** We share personal data about our professionals with prospective and actual customers in connection with the marketing, negotiation, sale, delivery, and provision of the products and services we make available. For example, we may share the images and contact information for the team of professionals who will be responsible for handling a specific customer's account.
- **Public Disclosure:** We may disclose certain personal data about our professionals, such as name, job title, work-related contact information and experience, publicly in connection with our recruiting and business operations.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal data to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- **Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
  - o in connection with the establishment, exercise, or defense of legal claims;
  - o to comply with laws and regulations or to respond to lawful requests and legal process;
  - o to protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
  - o to detect, suppress, or prevent fraud;
  - o to reduce credit risk and collect debts owed to us;
  - o to protect the health and safety of us, our professionals, their related persons, our customers, or any person; or
  - o as otherwise required by applicable law.
- **Otherwise With Consent or Direction:** We may disclose personal data about our professionals or their related persons to certain other third parties or publicly with their consent or direction.

## CONSENT

We are not required to obtain your consent for most of the processing activities that we undertake in respect of your personal data.

Subject to applicable law, we may, however, need your consent in limited circumstances for some uses of certain personal data. For instance, in certain circumstances, we may need your consent to use certain sensitive information, such as information about your health or ethnicity, in particular ways.

If we need your consent, we will notify you separately of the personal data we intend to use and how we intend to use it.

You will never be obliged to give us this consent. Where you have given us consent to collect, use or disclose your personal data in a certain way, you may withdraw your consent at any time. If you wish to withdraw any consent that you have given us, please contact the Qumulo People Team.

## **STORING AND TRANSFERRING YOUR PERSONAL DATA**

**Security.** We implement appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss, change or damage. Personal data we collect will be stored securely.

**International Transfers of your Personal Data.** The personal data we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third-party service providers have operations. Your personal data may be processed outside of the UK and EU, including in the United States. We will ensure that these international transfers of your personal data are made pursuant to appropriate safeguards, such as:

- ensuring that the personal data is only transferred to countries recognised as offering an equivalent level of protection as compared to the level of protection in the country you are located; or
- the transfer is made pursuant to appropriate safeguards, such as the standard contractual clauses adopted by the European Commission or terms approved by the UK Secretary of State (as applicable).

[Annex 4](#) sets out in detail the provisions for international transfers of your personal data to the United States.

If you wish to enquire further about the safeguards we use, please contact the Qumulo Legal Team, using the contact details at the end of this privacy notice.

**How Long We Keep Your Personal Data.** We retain personal data only for as long as is reasonably necessary to fulfill the purpose for which it was collected. However, if necessary, we may retain personal data for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so in accordance with legal, tax, and accounting requirements set by a legislature, regulator, or other government authority.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting and other applicable obligations.

Once retention of the personal data is no longer necessary for the purposes outlined above, we will either delete or de-identify the personal data or, if this is not possible (for example, because personal data has been stored in backup archives), then we will securely store the personal data and isolate it from further processing until deletion or deidentification is possible.

Additional details regarding the duration of the retention of personal data relating to professionals is available in [Annex 2](#).

## SENSITIVE INFORMATION

In limited circumstances, we may need to process special categories of personal data ("sensitive information") about you for specific purposes, including the following:

- **If you are a resident in the EU or UK:**
  - Demographic information: including information about your race or ethnicity, religious beliefs and sexual orientation.
  - Health information: including information about your health, and disabilities. We use this information to assess if we need to make reasonable adjustments for any disabilities, keep a record of any absences and fulfill other obligations under applicable law.
  - Workplace Information: trade union membership.
- **If you are a resident in the USA,** demographic information and health information as listed above as well as:
  - Account name and password;
  - Financial account, debit card, or credit card number in combination with any required security or access code;
  - Government identification numbers (such as social security number, driver's license number, state ID card number, or passport number); and
  - The contents of a data subject's communications.

We use this sensitive information for the purposes set forth in the [Our Collection and Use of Personal Data](#) section above.

We do not sell sensitive information, and we do not process or otherwise share sensitive information for the purpose of targeted advertising. However, subject to certain legal limitations and exceptions, you may be able to limit our processing of sensitive information (as described in the [Your Privacy Choices](#) section below).

## SALES, SHARING OR TARGETED ADVERTISING

We do not sell personal data about individuals acting in their capacity as professionals, and except as otherwise described in our [Privacy Notice](#) in connection with professionals acting in their capacity as website visitors, we do not share or otherwise disclose personal data about individuals acting in their capacity as professionals to third parties for the purpose of displaying advertisements that are selected based on personal data obtained or inferred over time from an individual's activities across businesses or distinctly-branded websites, applications, or other services (otherwise known as "targeted advertising" or "cross-context behavioral advertising").

## YOUR PRIVACY CHOICES

Depending on your country, province or state of residence, certain rights may apply to you. Please refer below for disclosures that may be applicable to you:

### ***For Professionals Located in the European Economic Area, Switzerland or UK:***

In accordance with applicable privacy law, you have the following rights in respect of your personal data that we hold:

- **Right of access.** You have the right to obtain:
  - confirmation of whether, and where, we are processing your personal data;



- o information about the categories of personal data we are processing, the purposes for which we process your personal data and information as to how we determine applicable retention periods;
  - o information about the categories of recipients with whom we may share your personal data; and
  - o a copy of the personal data we hold about you.
- **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal data we hold about you without undue delay.
  - **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal data without undue delay if the continued processing of that personal data is not justified.
  - **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal data if the continued processing of the personal data in this way is not justified, such as where the accuracy of the personal data is contested by you.
  - **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal data you have provided to us in a structured, commonly used, machine-readable format that supports reuse, or to request the transfer of your personal data to another person.
  - **Right to withdraw consent.** Where we rely on your consent for processing your personal data, you have the right to withdraw that consent at any time. Withdrawing consent shall not affect the lawfulness of processing carried out on the basis of that consent before it was withdrawn.
  - **Right to object.** You also have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your personal data, and we will assess and inform you if that is the case.

If you wish to exercise one of these rights, please contact the Qumulo Legal Team, using the contact details at the end of this privacy notice.

We will not charge you a fee for complying with your request to exercise one of these rights, other than where the request is manifestly unfounded or excessive (such as if you submit a number of repeated requests), in which case we may charge you a reasonable fee to cover our administrative costs.

You also have the **right to lodge a complaint** to a national supervisory authority:

- If you are based in the EEA, information about how to contact your local data protection authority is available [here](#).
- If you are based in the UK, information about how to contact your data protection authority is available [here](#).
- If you are based in Switzerland, information about how to contact your data protection authority is available [here](#).

For more information on the choices you may have and how to exercise them, please contact us as set forth below or fill out our Privacy Rights Requests Form available [here](#).



## For Professionals Located in California

As a California resident, you may be able to exercise the following rights (subject to certain limitations at law):

<b><i>The Right to Know</i></b>	<p>The right to confirm whether we are processing personal data about you and, under California law only, to obtain certain personalized details about the personal data we have collected about you, including:</p> <ul style="list-style-type: none"><li>• The categories of personal data collected;</li><li>• The categories of sources of the personal data;</li><li>• The purposes for which the personal data were collected;</li><li>• The categories of personal data disclosed to third parties (if any), and the categories of recipients to whom the personal data were disclosed;</li><li>• The categories of personal data shared for cross-context behavioral advertising purposes (if any), and the categories of recipients to whom the personal data were disclosed for those purposes; and</li><li>• The categories of personal data sold (if any), and the categories of third parties to whom the personal data were sold.</li></ul>
<b><i>The Right to Access and Portability</i></b>	<p>The right to obtain access to the personal data we have collected about you and, where required by law, the right to obtain a copy of the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.</p>
<b><i>The Right to Correction</i></b>	<p>The right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data.</p>
<b><i>The Right to Control Over Sensitive Information</i></b>	<p>The right to exercise control over our collection and processing of certain sensitive information.</p>
<b><i>The Right to Deletion</i></b>	<p>The right to have us delete the personal data we maintain about you.</p>

You also have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights.

### *Submitting Privacy Rights Requests*

To submit a request to exercise one of the privacy rights identified above, please:

Complete our [online form](#); or

Call 1-844-786-8567

Before processing your request, we will need to verify your identity and confirm you are a resident of the State of California. In order to verify your identity, we will generally either require the successful authentication of your work-related account, or the matching of sufficient information you provide us to the information we maintain about you in our systems. As a result, we require requests to include: relationship to Qumulo, address, first and last name, and email. We may at times need to request additional personal data from you, taking into consideration our relationship with you and the sensitivity of your request.

In certain circumstances, we may decline a privacy rights request, particularly where you are not a resident of the State of California or where we are unable to verify your identity.

#### *Submitting Authorized Agent Requests*

In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent's authority to act on your behalf. In order to verify the authorized agent's authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

## **UPDATES TO THIS PRIVACY NOTICE**

We will update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the "Last Updated" date at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify you by email, by prominent posting on the Workplace Practices and Policies page available on the company intranet, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification.

## **CONTACT US**

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to [dataprivacyoffice@qumulo.com](mailto:dataprivacyoffice@qumulo.com).

## ANNEX 1

### QUMULO ENTITIES AND CONTACT

Entity	Country	Contact
Qumulo, Inc	USA	dataprivacyoffice@qumulo.com.
Qumulo Australia PTY	Australia	dataprivacyoffice@qumulo.com
Qumulo GmbH	Germany	dpo.support@gdprlocal.com
Qumulo Japan K.K.	Japan	dataprivacyoffice@qumulo.com
Qumulo Ltd.	UK	dpo.support@gdprlocal.com
Qumulo International Ltd.	Croatia, France, Ireland	dpo.support@gdprlocal.com
Qumulo Singapore Pte. Ltd.	Singapore	dataprivacyoffice@qumulo.com
Qumulo Storage Canada Ltd.	Canada	dataprivacyoffice@qumulo.com

## ANNEX 2

### PERSONAL DATA WE COLLECT

#### A. INFORMATION WE COLLECT ABOUT APPLICANTS

Category of personal information	How we use it	Legal basis for the processing	Data retention period
<p><b>Personal contact details</b>, such as your name, phone number, address and e-mail address.</p>	<p>We use this information to open and maintain applicant records.</p>	<p>The processing is necessary for our legitimate interests, namely managing job applications for positions with Qumulo.</p>	<p><b>For unsuccessful candidates:</b> Up to 12 months from the date of interview, depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 9 months after the decision to not hire is made and communicated.</p> <p>Generic information (such as the name and specific position applied for and the date of rejection) may be retained for up to 6 years.</p> <p><b>For successful candidates:</b> We will retain this information as part of your HR file in accordance with the retention period set out in Annex 2B below.</p>
	<p>We use this information to communicate with you as part of the recruitment process.</p>	<p>The processing is necessary for our legitimate interests, namely communicating with applicants and managing job applications for positions with Qumulo.</p>	

<p><b>Job application information</b>, such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience, and other information contained in your CV.</p>	<p>We use this information to process and assess your application, including assessing your suitability for a role.</p>	<p>The processing is necessary for our legitimate interests, namely assessing the suitability of candidates for roles at Qumulo.</p>	<p><b>For unsuccessful candidates:</b> Up to 12 months from the date of interview, depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 9 months after the decision to not hire is made and communicated.</p> <p>Generic information (such as the name and specific position applied for and the date of rejection) may be retained for up to 6 years.</p> <p><b>For successful candidates:</b> We will retain this information as part of your HR file in accordance with the retention period set out in Annex 2B below.</p>
	<p>We use this information to calculate proposed salary and assess eligibility for certain benefits.</p>	<p>The processing is necessary for our legitimate interests, namely assessing and preparing job offers.</p>	
<p><b>Results of background checks, where allowable by local statute</b>, such as verification of education and employment history.</p>	<p>We use this information to assess your application, including assessing your suitability for a role.</p>	<p>The processing is necessary for our legitimate interests, namely assessing the suitability of candidates for roles at Qumulo.</p>	<p>Information is retained for the duration of your engagement with Qumulo.</p>
<p><b>Results of basic criminal records checks</b></p>	<p>Where relevant for your role, and where permitted under applicable law, we use this</p>	<p>The processing is necessary for our legitimate interests, namely assessing the</p>	<p>Information is retained for the duration of your engagement with Qumulo.</p>

	information to identify potential risk of unlawful behavior.	suitability of candidates for roles at Qumulo.	
<b>Results of anti-financial crime checks</b> , which include checks against sanctions lists and politically exposed persons lists.	Where relevant for your role, and where permitted under applicable law, we use this information to identify and manage our risk and exposure to bribery and corruption, money laundering, tax evasion facilitation and negative publicity, as well as complying with US government restrictions on contracting with sanctioned individuals.	<p>The processing is necessary for our legitimate interests, namely assessing the suitability of candidates for roles at Qumulo.</p> <p>-----</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject.</p>	Information is deleted at the end of the recruitment process, unless the information is relevant to an ongoing employment relationship, then up to 3 years from the end of your engagement with Qumulo.
<b>Nationality, citizenship and right to work information</b> , such as country of birth, government identification documents (including passports and residency permits) and, where relevant, visa information.	<p>We use this information to determine your eligibility to work.</p> <p>-----</p> <p>We use this information to fulfill our obligations to relevant government authorities, including obtaining an immigration visa or work permit for you (where required and where requested by you).</p>	<p>The processing is necessary for compliance with a legal obligation to which we are subject.</p> <p>-----</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject.</p>	<p><b>For unsuccessful candidates:</b></p> <p>Up to 12 months from the date of interview, depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 9 months after the decision to not hire is made and communicated.</p> <p>Generic information (such as the name and specific position applied for and the date of</p>

			<p>rejection) may be retained for up to 6 years.</p> <p><b>For successful candidates:</b> We will retain this information as part of your HR file in accordance with the retention period set out in Annex 2B below.</p>
<p><b>Interview evaluation and appraisal information</b>, such as comments and notes made by interviewers or other employees in connection with your application.</p>	<p>We use this information to process and assess your application, including assessing your suitability for a role.</p>	<p>The processing is necessary for our legitimate interests, namely assessing the suitability of candidates for roles at Qumulo.</p>	<p><b>For unsuccessful candidates:</b> Up to 12 months from the date of interview, depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 9 months after the decision to not hire is made and communicated.</p> <p>Generic information (such as the name and specific position applied for and the date of rejection) may be retained for up to 6 years.</p> <p><b>For successful candidates:</b> We will retain this information as part of your HR file in accordance with the retention period set out in Annex 2B below.</p>
	<p>We use this information to calculate proposed salary and assessing eligibility for certain benefits.</p>	<p>The processing is necessary for our legitimate interests, namely assessing and preparing job offers.</p>	
	<p>We use this information to monitor and improve our application process.</p>	<p>The processing is necessary for our legitimate interests, namely assessing and managing applications for positions with Qumulo.</p>	
<p><b>Any other data provided by you in the course of the application</b></p>	<p>We use this information to process and assess your</p>	<p>The processing is necessary for our legitimate interests,</p>	<p><b>For unsuccessful candidates:</b> Up to 12 months from the date of</p>



<p><b>process</b>, including electronic communications with you in relation to the application process.</p>	<p>application, including assessing your suitability for a role.</p>	<p>namely assessing the suitability of candidates for roles at Qumulo.</p>	<p>interview, depending on jurisdiction shorter periods may apply, <i>e.g.</i>, with respect to Germany up to 9 months after the decision to not hire is made and communicated.</p>
	<p>We use this information to respond to your enquiries and to monitor and improve our application process.</p>	<p>The processing is necessary for our legitimate interests, namely managing applications and improving the application process.</p>	<p>Generic information (such as the name and specific position applied for and the date of rejection) may be retained for up to 6 years.</p> <p><b>For successful candidates:</b> We will retain this information as part of your HR file in accordance with the retention period set out in Annex 2B below.</p>

## B. INFORMATION WE COLLECT ABOUT PROFESSIONALS

Category of personal information	How we use it	Legal basis for the processing	Data retention period
<p><b>Identity and contact details</b>, such as your name, title, gender, phone number, address, e-mail address, date of birth and photograph.</p>	<p>We use this information to open and maintain human resources records.</p>	<p>The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.</p>	<p>During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, <i>e.g.</i>, with respect to Germany up to 3 years from the end of your engagement with Qumulo.</p>

	We use this information to communicate with Team Members for internal business purposes or emergencies.	The processing is necessary for our legitimate interests, namely communicating with Team Members.	
	We use this information to issue payslips and process payroll.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.	
	We use this information to grant you access to our premises and/or internal computer systems.	The processing is necessary for our legitimate interests, namely providing Team Members access to company resources.	
	We use this information to maintain an internal directory of Team Members.	The processing is necessary for our legitimate interests, namely facilitating communication and collaboration between our Team Members.	
<b>Payment information</b> , such as your credit card or bank account details and billing address.	We use this information to pay salaries and other benefits to Team Members.	The processing is necessary for the performance of a contract.	During employment and for 6 years after employment ceases.  General wage lists, wage tax, and certain other tax-related documents depending on the jurisdiction could be stored up to 10 years.

	We use this information to process expenses claims.	The processing is necessary for the performance of a contract.	
<b>Nationality, citizenship and right to work information</b> , such as country of birth, government identification documents (including passports and residency permits), national insurance number or social security number and, where relevant, visa information.	We use this information to determine your ongoing eligibility to work.	The processing is necessary for compliance with a legal obligation to which we are subject.	During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, <i>e.g.</i> , with respect to Germany up to 3 years from the end of your engagement with Qumulo.
	We use this information to fulfill our obligations to relevant government authorities, including obtaining an immigration visa or work permit for you (where required and where requested by you).	The processing is necessary for compliance with a legal obligation to which we are subject.	
<b>Current job role information</b> , such as position held, location of role, job description, responsibilities and assignments, years of service, and previous roles at Qumulo.	We use this information to maintain human resources records.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.	During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, <i>e.g.</i> , with respect to Germany up to 3 years from the end of your engagement with Qumulo.
	We use this information to allocate resources.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.	
	We use this information to assess, forecast and make	The processing is necessary for our legitimate interests,	

	business decisions about our human resources.	namely managing our resources and informing our marketing and business development.	
	We use this information to determine the tasks and responsibilities assigned to you.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.	
	We use this information to maintain an internal directory of Team Members.	The processing is necessary for our legitimate interests, namely facilitating communication and collaboration between our Team Members.	
<b>Job application information</b> , such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience, and other information contained in your CV.	We use this information to make ongoing salary decisions and decisions relating to eligibility for certain benefits.	The processing is necessary in order to take steps prior to entering into a contract with you.	During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, <i>e.g.</i> , with respect to Germany up to 3 years from the end of your engagement with Qumulo.
	We use this information to monitor and allocate human resources.	The processing is necessary for our legitimate interests, namely managing our human resources.	
	We use this information for assessing suitability for certain	The processing is necessary for our legitimate interests,	

	tasks, promotions, job moves and staff restructuring.	namely managing our human resources.	
<b>Recruitment information</b> , such as comments and notes made by interviewers or other Team Members in connection with your application.	We use this information to make ongoing salary decisions and decisions relating to eligibility for certain benefits.	The processing is necessary in order to take steps prior to entering into a contract with you.	12 months from the date of interview or for the duration of the employment relationship, whichever is longer..
	We use this information to monitor and allocate human resources.	The processing is necessary for our legitimate interests, namely managing our human resources.	
	We use this information to assess your suitability for certain tasks, and to assess suitability for, and to process promotions, job moves and staff restructuring.	The processing is necessary for our legitimate interests, namely managing our human resources.	
<b>Benefits information</b> , such as salary details, bonus payments, pension details, share option details, medical and dental insurance, and any salary sacrifice benefits.	We use this information to maintain human resources records.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.	During employment and for 6 years after employment ceases.  General wage lists, wage tax, and certain other tax-related documents depending on the jurisdiction could be stored up to 10 years.
	We use this information to provide and administer benefits for which you are eligible.	The processing is necessary for the performance of a contract.	

	We use this information to allocate resources.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.	
	We use this information to assess, forecast and make business decisions in relation to financial and other obligations to Team Members and third parties (such as tax authorities and beneficiaries) in relation to any benefits owed to Team Members.	The processing is necessary for our legitimate interests, namely managing our resources.	
	We use this information to report to tax authorities.	The processing is necessary for compliance with a legal obligation to which we are subject.	
<b>Details of partners, dependants, beneficiaries.</b>	We use this information to process benefits (including governmental tax and social benefits) to which Team Members' partners, dependents or other beneficiaries may be entitled.	The processing is necessary for the performance of a contract.	For the duration of your employment.
<b>Next of kin</b>	We use this information to contact the designated	The processing is necessary for compliance with a legal	For the duration of your employment.

	contacts in the case of an emergency.	obligation to which we are subject.	
<b>Results of background checks</b> , namely whether you passed any background checks conducted during the application process.]	[We use this information to verify your suitability for certain tasks and for other roles at Qumulo, and to determine whether additional checks are required to assign you to other roles.]	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.	For the duration of your employment.
<b>Performance and development records</b> , such as training records, records of courses and training undertaken, performance reviews and assessments.	We use this information to conduct performance appraisals and to assist with career planning and skills monitoring.	The processing is necessary for our legitimate interests, namely managing our human resources and fulfilling our professional and contractual obligations to third parties.	During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, <i>e.g.</i> , with respect to Germany up to 3 years from the end of your engagement with Qumulo.
	We use this information to assess suitability for, and to process promotions, job moves and staff restructuring.	The processing is necessary for our legitimate interests, namely managing our human resources and monitoring the qualifications and experience of our staff.	
	We use this information to provide references for future applications.	The processing is necessary for your legitimate interests, namely in connection with your application to a new position.	



<p><b>Disciplinary, capability and conduct records</b>, such as details of warnings, details of grievances submitted by and in relation to the individual and other records relating to conduct.</p>	<p>We use this information to assess and take action in relation to disciplinary, capability, grievance and conduct issues.</p>	<p>The processing is necessary for the performance of a contract.</p>	<p>During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, <i>e.g.</i>, with respect to Germany up to 3 years from the end of your engagement with Qumulo.</p>
	<p>We use this information to maintain employment records, monitor and improve our human resources procedures and processes.</p>	<p>The processing is necessary for our legitimate interests, namely managing our human resources, and ensuring compliance with internal policies and procedures, and risk management.</p>	
	<p>We use this information to comply with legal obligations to which we may be subject.</p>	<p>The processing is necessary to comply with a legal obligation to which we are subject, such as workplace bullying and harassment and anti-discrimination legislation in the UK and EU.</p>	
<p><b>Absence records.</b> Records relating to time away from employment, including holiday, illness and paternity/maternity leave.</p>	<p>We use this information to monitor absence and sickness, to make corresponding decisions relating to human resource allocation, and to address any other issues that may arise from absences.</p>	<p>The processing is necessary for our legitimate interests, namely managing our human resources and ensuring compliance with internal policies and procedures.</p>	<p>During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, <i>e.g.</i>, with respect to Germany up to 3 years from the end of your engagement with Qumulo.</p> <p>For maternity, paternity, shared parental leave and other family leave</p>

	We use this information to meet statutory requirements with regards to illnesses, accidents and absences.	The processing is necessary to comply with applicable law relating to workplace health and safety, and for carrying out obligations and exercising specific rights in the field of employment insofar as it is authorized by law.	records, these will be retained for the duration of employment and up to 3 years after the end of the tax year in which the maternity, paternity, shared parental leave or other family leave period ends; in Germany up to 2 years from the end of any maternity leave the Employee has taken.
<b>Information collected in exit interviews and employee surveys and/or contests.</b>	We use this information to monitor, assess and improve our employee development and company culture.	The processing is necessary for our legitimate interests, namely informing our employees and business development.	12 months from the date of interview.
<b>Disability and health records</b> , such as information relating to any disability or health condition that is relevant to an individual's job role.	We use this information to address legal obligations to Team Members, including making reasonable adjustments to enable or assist Team Members to perform their role.	The processing is necessary to comply with applicable law relating to equality and non-discrimination, and for carrying out the obligations and exercising specific rights in the field of employment insofar as it is authorized by law.	During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 3 years from the end of your engagement with Qumulo.
	We use this information to determine whether a Team Member is fit to undertake	We will process this personal data in this way only to the extent that you have given us your explicit consent to the	

	tasks required by their job role.	processing of this personal data.	
<b>Equal opportunities information</b> , such as information relating to gender, race and ethnicity, disability, and veteran status.	We use this information to conduct equal opportunity and diversity monitoring where permitted or required by law.	We will process this personal data only to the extent that you have given us your explicit consent to do so.	For the duration of your employment and 1 year after.
	We use this information to conduct equal opportunity and diversity reporting where permitted or required by law.	The processing is necessary for compliance with a legal obligation to which we are subject.	
<b>Health and safety records</b> , including information relating to health and safety in the workplace, accidents and near misses.	We use this information to address legal obligations to Team Members in relation to health and safety in the workplace.	The processing is necessary for carrying out obligations and exercising specific rights in the field of employment insofar as it is authorized by EU or Member State law.	6 years after the date of the report or termination of employment (whichever is later); depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 3 years from the end of your engagement with Qumulo.
<b>Access logs and CCTV.</b> We may directly collect CCTV recordings at our premises or collect such recordings from the security providers at our premises].	We use this information to monitor compliance with internal rules, policies and your employment agreement.	The processing is necessary for our legitimate interests, namely enforcing compliance with our policies.	72 hours after the date on which CCTV footage was recorded.
	We use this information to monitor access to our premises for security purposes.	The processing is necessary for our legitimate interests, namely ensuring the safety and security of Team Members and assets.	

<p><b>Any other data provided by the Team Member that is stored on employer's equipment and computer systems</b>, including electronic communications, information relating to use of the computer systems, documents stored on company hardware.</p>	<p>We use this information to monitor compliance with internal rules and policies.</p>	<p>The processing is necessary for our legitimate interests, namely enforcing compliance with our policies.</p>	<p>During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 3 years from the end of your engagement with Qumulo.</p>
	<p>We use this information to investigate security breaches and misuse of computer equipment and systems, and to maintain and back-up records in accordance with back-up and disaster recovery plans.</p>	<p>The processing is necessary for our legitimate interests, namely providing internal computer systems and hardware, and ensuring the security and integrity of those systems.</p>	
<p><b>Data collected through monitoring of Team Members' communications and use of employer equipment</b>, such as registration and login times and dates, internet domain names visited using Qumulo IT equipment, software used, account status and other equipment use metrics.</p>	<p>We use this information to investigate reported or suspected breaches of compliance with internal rules and policies.</p>	<p>The processing is necessary for our legitimate interests, namely monitoring and enforcing our rights.</p>	<p>During employment and for up to 6 years after employment ceases, depending on jurisdiction shorter periods may apply, e.g., with respect to Germany up to 3 years from the end of your engagement with Qumulo.</p>
	<p>We use this information to identify and investigate security breaches and misuse of computer equipment and systems.</p>	<p>The processing is necessary for our legitimate interests, namely providing internal computer systems and hardware, and ensuring the security and integrity of those systems.</p>	

## ANNEX 3

### SERVICE PROVIDERS

<b>Service Providers</b>	<b>Service Provided</b>
ADP	Payroll
Axa	UK private health coverage (optional)
BambooHR	Employee record management
Box	Document storage
Brain Payroll	UK Payroll
BreatheHR	Employee record management
Coupa	Expense reimbursement
Veremark	Background Checks
Globalization Partners	Corporate services
Google Workspace	Document storage
Greenhouse	Applicant management
PsychCom	Employee Assistance Program
Rapport	UK Pension
Zedra	Corporate services

## ANNEX 4

### PROVISIONS FOR INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA TO THE UNITED STATES

We comply with the EU-U.S. Data Privacy Framework (“**EU-U.S. DPF**”), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“**Swiss-U.S. DPF**”) as set forth by the U.S. Department of Commerce. We have certified to the U.S. Department of Commerce that we adhere to the EU-U.S. Data Privacy Framework Principles (“**EU-U.S. DPF Principles**”) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. We have certified to the U.S. Department of Commerce that we adhere to the Swiss-U.S. Data Privacy Framework Principles (“**Swiss-U.S. DPF Principles**”) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles (collectively, the “**DPF Principles**”), the DPF Principles shall govern. To learn more about the Data Privacy Framework (“**DPF**”) program, and to view our certification, please click [here](#).

The Federal Trade Commission has jurisdiction over our compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

#### **Complaints per the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF**

In compliance with the EU-U.S. DPF, and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, we commit to resolve DPF Principles-related complaints about our collection and use of your personal data. EU, UK and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF should first contact us using the details referenced in the Contact Us section of the Privacy Policy. EU, UK and Swiss individuals may, under certain circumstances, invoke binding arbitration with respect to complaints about our collection and use of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. See DPF Annex 1 here.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, we commit to cooperate and comply with the advice of the panel established by the EU data protection authorities (“**DPAs**”), the UK Information Commissioner’s Office (“**ICO**”) and the Gibraltar Regulatory Authority (“**GRA**”) and the Swiss Federal Data Protection and Information Commissioner (“**FDPIC**”) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

#### **Onward transfers to third parties**

In the event that we disclose your personal data to third parties to perform certain services on our behalf as “agents” (as such term is utilized under the DPF), we will do so only for limited and specified purposes consistent with any notice provided to you or your choices regarding processing and disclosure. These companies perform services at our instruction and pursuant to contracts which require they provide at least the same level of privacy protection as is required under the DPF and notify us if they are no longer able to provide such protections, at which point we will take reasonable

remedial steps. We may also disclose personal data to our affiliates in order to support business operations as disclosed in paragraph 9 of this privacy notice.

Our accountability for personal data that we receive under the DPF and subsequently transfers to a third party is described in the DPF Principles. In particular, we remain responsible and liable under the DPF Principles if third-party agents that we engage to process the personal data on our behalf do so in a manner inconsistent with the DPF Principles, unless we prove that we are not responsible for the event giving rise to the damage.

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

### **Option to limit certain onward transfers to third parties**

You have the opportunity, in certain circumstances, to opt out of sharing your personal data with third parties other than our agents or before we use it for a purpose other than which it was originally collected or subsequently authorized. To limit the use and disclosure of your personal data under the DPF, please submit a written request using the contact details at the end of the privacy notice, indicating as such.

We will not disclose your sensitive personal data to any third party without first obtaining your opt-in consent.

In each instance, please allow us a reasonable amount of time to process your response.

### **Your DPF rights**

Upon request to us, we will confirm whether we are processing your personal data pursuant to the DPF and provide you with applicable data in a reasonable amount of time. You also have the right to correct, amend, or delete the personal data processed pursuant to the DPF where it is inaccurate or has been processed in violation of our privacy disclosures to you, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated. We may require payment of a non-excessive fee to defray our expenses in this regard. Please allow us a reasonable amount of time to respond to your inquiries and requests.

### **Personal data retention**

We will retain the personal data processed pursuant to the DPF in a form that identifies you pursuant to the retention policy described in the privacy notice. We may continue processing such personal data for longer periods, but only for the time and to the extent such processing reasonably serves the purposes of archiving in the public interest, journalism, literature and art, scientific or historical research and statistical analysis, and subject to the protection of our privacy disclosures. After such time periods have expired, we may either delete your personal data or retain it in a form such that it does not identify you personally.

### **How we protect your data**

We will implement reasonable and appropriate security measures to protect your personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in processing and the nature of such data.

If you wish to enquire further about these safeguards used, please contact us using the contact details at the end of the privacy notice.