

Global Applicant Privacy Notice

What does this policy cover?

The Dropbox Group has prepared this Global Applicant Privacy Notice for applicants across the globe. When we say “Dropbox,” “we” or “us” in this document, we mean the Dropbox entity to which you are applying. You will see a number of references to the “Dropbox Group,” which includes all other Dropbox entities. Details of these different entities can be obtained from privacy@dropbox.com. We may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

What personal data does Dropbox collect/use about me?

Dropbox will collect, process and use the following categories of personal data about you in connection with your application:

Applicant Data

Category	Examples
Identification data	Name, signature, photograph, date of birth, passport, government issued identification documents or identification numbers
Contact details	Home address, telephone or cellular number, email address
Education and work experience	Contact details for your current or former employer, information about your educational background, your work experience, and other related and applicable experience.
Other application data	Information included in your application form/resume/CV, such as skill sets, licensure, certifications, accomplishments, social media, personal websites, and leadership experience
Information collected as part of the interview process	Notes or recordings taken from your interview(s) or information provided from recruitment agencies or other third parties, and interview test results

These categories together are considered your “Applicant Data.” We collect this applicant data when you apply for a role with Dropbox or during the course of the recruitment process. We may also collect your personal data on-line to the extent that you have chosen to make this information publicly available. For example, we may find your profile on professional social media websites (such as LinkedIn and XING) and contact you about open roles for which you and your skill set may be suitable and a good prospect for success with Dropbox.

In addition to the use of your Applicant Data, Dropbox collects, processes and uses the following special categories of “Sensitive Applicant Data.”

Sensitive Applicant Data

Category	Examples
Health and medical data	Information on disability for purposes of accommodating your application and interview, and to comply with legal obligations.
Race or ethnicity data	Information contained in your passport, citizenship documents, applicable visa and right to work documentation; information of your race, ethnicity, and gender for legal obligations (provided on a voluntary basis).
Background screening	Also known as a background check, this is information pertaining to your history and suitability for hire.

We may collect Sensitive Applicant Data about a candidate to the extent permitted to do so by applicable laws (for example, US equal opportunity laws) in order to facilitate our hiring process and to support our efforts to create an inclusive and diverse workplace. We may also collect Sensitive Personal Applicant Data to the extent that a candidate chooses, without being asked, to voluntarily disclose during the recruiting process.

Background Checks and Screenings

If you are in serious consideration for a role, we may then conduct a background check or instruct a third party to do so on our behalf. These background checks may include criminal history verification to the extent permitted by the FCRA and all other applicable laws. The results of any background checks will be considered part of your Sensitive Applicant Data.

Our legal basis for background screening is our legitimate interest to assess your suitability for employment by making an informed decision to make an employment offer. If a background screening is required, you may be contacted by a background screening service provider to request authorization for the release of your information, and at that time you will be provided with further information about the process and what personal data it might involve.

Why does Dropbox need to use this information about me?

Dropbox collects and uses this Applicant Data and Sensitive Applicant Data for a variety of reasons linked to processing your application for a role with us. To provide you with a better understanding, we have a list of reasons why we collect and use this data (the “**Processing Purposes**”) along with a few examples:

Processing Purposes	Type of Data
To administer and process your application, including processing a job offer should your application be successful	Identification data, contact details, information about your qualifications and employment history, information obtained during your interview, and information contained in your application/resume/CV.
To determine your eligibility for the role for which you applied	Identification data, contact details, information about your work and education experience, information obtained during your interview, and information contained in your application/resume/CV.
To communicate with you, including informing you of future opportunities with Dropbox	Identification data, contact details, information about your work and education experience.
To comply with and administer employment related requirements, such as income tax, national insurance deductions, and labor, employment, immigration and/or corporate compliance laws in or outside of your home country.	Identification data, contact details, information collected as part of the interview process, health and medical data, race or ethnicity data, background screening data.
To respond to and comply with valid legal requests from regulators or other authorities in or outside of your home country	Identification data, contact details, information collected as part of the interview process, health and medical data, race or ethnicity data, background screening data.
To comply with corporate financial responsibilities, including audit requirements (both internal and external) and cost/budgeting analysis and control	Identification data, contact details, information collected as part of the interview process.

Dropbox will obtain your express consent (opt-in) if any sensitive data is to be (i) disclosed to a third party or (ii) used for purposes other than those for which it was originally collected or subsequently authorized by you.

Our legal bases for processing your Applicant Data and Sensitive Applicant Data include:

- compliance with legal and regulatory obligations;
- the legitimate interests of Dropbox, our affiliates, or other third parties (such as business partners, suppliers, governmental bodies, or courts);
- your consent, where it is applicable, meets the requirements of data protection law, and has been separately obtained;
- protection of the vital interests of you or of other applicants; and
- establishing, exercising or defending a legal claim.

When we talk about legitimate interests of Dropbox or third parties, these can include:

- assessing your suitability for employment/engagement with Dropbox;
- implementation and operation of a group-wide organizational structure and group-wide information sharing;
- prevention of fraud, misuse of company IT systems, or criminal activity;
- protecting and ensuring Dropbox's legal rights and compliance;
- physical security, IT, and network security; and
- internal investigations.

When relying on these legitimate interests, we will balance the reason for processing your personal data with your rights to ensure it is appropriate for us to proceed. We will also work to identify any additional steps we need to take to protect your rights, if applicable.

With whom might Dropbox share my personal data?

As necessary for the Processing Purposes, Dropbox may share personal data as follows:

- **Within the Dropbox Group.** Dropbox operates globally and your hiring entity will vary depending on your location and the position to which you apply. Because any Dropbox entity is part of a wider group with offices located across the globe, Dropbox may transfer your Applicant Data and Sensitive Applicant Data to, or otherwise allow access to such data by, other entities within the group and with the Directors of the Dropbox Group for any of the following purposes:
 - administer and process your application;
 - communicate information about the Dropbox Group;
 - monitor and assure compliance with applicable policies, procedures, laws, and regulations; and
 - respond to requests and legal demands from regulators and other legal authorities, including authorities in the US, UK, EU, and other applicable jurisdictions.
- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes identified above, personal data may be transferred to regulators, courts, and other legal authorities (e.g., tax and law enforcement authorities), independent external advisors or auditors, Dropbox insurance providers, pensions and benefits providers, and internal compliance and investigation teams (including external legal advisers appointed to conduct internal investigations).
- **Data processors.** Your personal data may also be shared with one or more third parties to process personal data under our instructions ("Data Processors"). These Data Processors

will carry out Dropbox instructions related to recruitment, background screening, workforce administration, IT system support and maintenance, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate security measures to safeguard your personal data. These Data Processors will process your personal data only to perform tasks on Dropbox's behalf and according to our instructions, and we will remain responsible for their handling of your information.

We will not sell your information to advertisers or third parties. For additional information on the Dropbox Group entities and any who receive, process, and use your personal data, you may contact us at privacy@dropbox.com.

Transfers outside the European Union, the European Economic Area, the United Kingdom, or Switzerland.

If you are located and applying for a position within the European Union ("EU"), the European Economic Area ("EEA"), the United Kingdom, or Switzerland, some of the recipients with whom Dropbox may share your personal data (e.g., Applicant Data and Sensitive Applicant Data) may be located in countries outside of those locations. For such transfers, Dropbox relies upon a variety of legal mechanisms such as Standard Contractual Clauses, the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, the Swiss-US Data Privacy Framework, and the European Commission's adequacy decisions about certain countries, as applicable.

What about the Data Privacy Framework?

Dropbox, Inc. complies with the EU-U.S. and Swiss-U.S. Data Privacy Frameworks, as well as the UK Extension to the EU-U.S. Data Privacy Framework, as set forth by the U.S. Department of Commerce regarding the processing of personal data transferred from the EU, the EEA, the United Kingdom, or Switzerland to the United States. Dropbox, Inc. has certified to the U.S. Department of Commerce that it adheres to the Principles of these Data Privacy Frameworks with respect to such data. If there is any conflict between this Privacy Policy and the Data Privacy Framework Principles, the Principles shall govern. In accordance with the Data Privacy Framework Principles, Dropbox, Inc. shall remain liable for onward transfers if a processor processes personal data in a manner inconsistent with the Principles. To learn more about the Data Privacy Frameworks, and to view our certification, visit <https://www.dataprivacyframework.gov>.

Dropbox, Inc. is subject to oversight by the U.S. Federal Trade Commission. In compliance with the Data Privacy Framework Principles, Dropbox commits to resolve complaints about our collection or use of your personal data. For EU, EEA, UK, and Swiss-based applicants with inquiries or complaints regarding our Data Privacy Framework compliance we ask that you first contact us at privacy@dropbox.com. If you are not satisfied with our response, you can contact the competent data protection authority for the country where you reside. As set forth in Annex 1 to the Data Privacy Framework Principles, you may be entitled to binding arbitration to determine whether Dropbox has complied with its obligations under the Principles when processing your personal data.

Dropbox, Inc. is committed to cooperating with panels established by the EU data protection supervisory authorities (EU DPA's), the Swiss Federal Data Protection and Information Commissioner ("FDPIC"), and the UK Information Commissioner, as applicable based on your location, and will comply with their guidance with regard to personal data, including human resources data, transferred from the EU, EEA, the UK, or Switzerland in the context of our application.

How long will Dropbox keep my personal data?

Dropbox will not keep personal data for longer than is necessary. We may, for example, keep your personal data for a reasonable time after your application process is completed, in case we have future job opportunities for which you are suited. Where personal data is kept, the retention period will be determined based on applicable law.

What are my rights with respect to my personal data?

You have a number of rights in relation to your personal data (including both your Applicant Data and your Sensitive Applicant Data). These can differ by country or location, but can be summarized in broad terms as follows:

1. Right of access

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing, and the recipients or categories of recipients. Privacy and other applicable laws require that prior to providing you this right of access, Dropbox will take into account and balance the interests of other persons who may be impacted by your access; therefore, the right of access is not absolute and may result in redaction or withholding of certain information not directly related to your personal data. If you want to request more than one copy, Dropbox may charge a fee.

2. Right to rectification/correction

You have the right to rectify inaccurate or incomplete personal data.

3. Right to erasure (right to be forgotten)

You may have the right to ask us to erase personal data concerning you.

4. Right to restriction of processing

In limited circumstances, you may have the right to request that we restrict processing of your personal data; however, your request may be overridden by our legitimate interests in processing that data.

5. Right to data portability

You have the right to receive personal data which you have provided to Dropbox in a structured, commonly used, and machine-readable format and you have the right to transmit that data to another entity.

6. Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we may be required to stop processing your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

7. Right to a digital legacy

In certain countries within the EEA, you have the right to issue general or specific directives about the disposal of your personal data after your death. This right is most often related to personal data of a successful applicant who is hired by Dropbox and amasses a digital legacy of personal data over the course of tenure with a company.

8. Right to Limit and Disclosure

We do not use or disclose employee sensitive personal information for purposes except as set forth in the Privacy Notice (and as permitted pursuant to Cal. Code Regs. tit. 11, § 7027(l) (2022)).

Dropbox won't discriminate against you for exercising any of the rights available under the California Consumer Privacy Act ("CCPA"), the EU General Data Protection Regulation ("GDPR"), or other applicable laws. In regard to personal data covered by the Privacy Notice, we don't have actual knowledge that we sell or share the personal data of individuals under 16 years of age.

Exercising Your Rights.

If you would like to exercise your rights, you may do so by emailing privacy@dropbox.com with your request. You may also designate someone as an authorized agent to submit requests and act on your behalf. To do so, you must provide us with written permission that allows the authorized agent to act on your behalf and verify your identity at Dropbox's request.

The Final Wrap for all Applicants

For questions about how Dropbox handles your personal data in relation to the processing of your personal data or to submit questions or concerns about this notice, please contact privacy@dropbox.com. Dropbox has also established a Data Protection Office. This function is led by our Data Protection Officer and is responsible for oversight of privacy at Dropbox. You may direct questions and/or complaints about the processing of personal data to the Data Protection Officer at privacy@dropbox.com.

If you are not satisfied with the Dropbox response to your inquiry or request to exercise your right in relation to the processing of your personal data, you also have the right to lodge a complaint with the competent data protection supervisory authority. Please contact privacy@dropbox.com to obtain contact information for the appropriate authority.