

SANDISK APPLICANT PRIVACY NOTICE

Last Updated: November 12, 2024

Introduction

Sandisk Technologies, Inc. and its subsidiaries and affiliates (together “**Sandisk**,” “**we**,” “**us**” or “**our**”) is committed to protecting the privacy and security of your personal information. This Privacy Notice (“**Notice**”) describes what personal information we collect from Sandisk job applicants, the purposes for the collection, and to whom we may disclose your personal information.

This Notice applies only to the personal information of job applicants and candidates of employment, as well as those who may participate in recruiting programs and events. This notice does not form part of any contract of employment or other contract to provide services. For information about how we collect and use your information as a consumer, please review our [Privacy Statement](#) at Sandisk.com.

To submit a profile for a position with Sandisk, you must read this Notice and, depending on the applicable data protection laws where you reside, either acknowledge that you have received and understood it or consent to the terms of this Notice. If you do not either acknowledge that you have received and understood it or consent to this Notice, you will not be able to submit a profile for a position.

As used in this Notice:

- “Processing of personal information” means any operation performed on personal data, such as the collection, recording, storing, using, reviewing, disclosing, transferring, or deleting of personal information.
- “Personal information” means information relating to an identified or identifiable Sandisk applicant insofar as that information has been obtained by Sandisk in the context of the Sandisk’s applicant’s potential working relationship with Sandisk. The personal information we may process about you are detailed in the section “The Personal Information That Sandisk Collects”.

If you have any questions, you can reach out Sandisk’s Data Protection Officer (DPO) by email at privacy@sandisk.com.

The Entity That Is Collecting Your Personal Information

The data controller of your personal information is the Sandisk entity you are interacting with as part of your application (i.e. either Sandisk Technologies, Inc. or one of its subsidiary or affiliate).

How Sandisk Collects Your Personal Information

Sandisk collects your personal information from a variety of sources, but mainly from you. You provide us your personal information when you apply for a job, and when you work for Sandisk as employee. For example, you create personal information when you interact with our information and communication systems. We will also receive personal information about you from your manager, co-workers, People Support, and other functions.

Sandisk also collects personal information about you from third parties but only if authorized or required by applicable local law. For example, and depending on the applicable local law where you reside, Sandisk may collect your personal information: recruiters, consumer reporting agencies, service providers, vendors, contractors, credit agencies, or service providers who provide services on our behalf.

Where legally permissible, we collect your personal information as part of a background check. Sandisk may verify your personal information and conduct reference checks and/or conduct background checks (if and to the maximum extent permitted by applicable local law) if you are offered a job.

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The Personal Information That Sandisk Collects

As part of the application process and unless prohibited by applicable local law, Sandisk requests and processes the following categories of personal information about you:

- Personal details, such as your full name, preferred name, and any names you may have used in the past, date of birth and age, nationality, photograph (optional);
- Contact information, such as your home address, personal phone number, personal email address;
- Personal information included in your resume or CV, cover letter, and interview notes;
- Employment-related information, such as the position you are applying for, your previous employer information, your previous work history, your education and training history, the languages you speak, qualifications and certifications, and your current compensation information (where provided by you at your sole discretion), as well as your compensation expectations salary or wage expectations;
- Your references;
- Background check information (where legally permissible);
- Your immigration status and whether you need work authorization (if applicable);
- Characteristics protected under California, EU and UK laws unless prohibited by applicable local law, such as your race, ethnicity, national origin, gender, gender identity/expression, sexual orientation, disability (including disability access and special related needs), and military or veteran status where relevant;
- Where permitted or required by applicable local law, we may collect personal information related to criminal convictions;
- Internet and other electronic network information (in case of online job application), such as your IP address, log files, login information, information relating to your usage and activities on Sandisk's websites and information collected from cookies. Please refer to our Cookie Statement available on Sandisk's websites for more information on how we use cookies and other similar technologies, including how to exercise your rights to opt out of cookies; and
- Any other relevant personal information for assessing your professional skills in view of the job position you are applying for.

You may also voluntarily submit and attach documents for Sandisk to consider.

Sandisk may collect your personal information that belongs to special categories of data such as:

- race, ethnicity, and/or religion, only where required by applicable local law;
- immigration status, only where required by applicable local laws;
- disability access and special needs, where strictly necessary and permitted by applicable local law;
- information about criminal convictions, only when required by applicable local law.

The provision of certain personal information may be necessary or optional. Mandatory data will be marked as such at the moment of collection of your personal information. If you refuse to provide mandatory data, you will not be able to submit a profile for a position.

The Nature of Sandisk's Processing Activities

Sandisk processes your personal information in compliance with applicable data protection laws and where there is a legitimate purpose for doing so.

To consider your application for employment, Sandisk processes your personal information for the following purposes:

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Processing activity	Legal Basis	Data Retention period
<p>Recruit and selection of employees, which includes the acceptance of applications, the vetting of candidates, the management of interviews, deciding to whom we will offer a job, maintaining records related to recruitment, right to work verifications, regulatory purposes, such diversity requirements (where required under applicable local laws).</p>	<p>Where necessary to take steps to enter into the employment contract with the employee</p>	<p>Applicant files are maintained for 3 years after the close of the requisition, unless otherwise required by applicable local law where you work</p> <p>Work authorization records are maintained for 3 years after termination of employment, unless otherwise required by applicable local law where you work</p>
<p>Verification and source checking (only if authorized or required by applicable local law), which includes verifying the information provided to us in connection with applications, speaking to references, conducting background checks (when applicable).</p>	<p>When necessary to take steps prior to entering into a contract with the applicant</p>	<p>References and background checks are maintained for 6 years after creation, unless otherwise required by applicable local law where you work</p>
<p>Communicating with applicants, which includes maintaining contact information, and communicating with applicants.</p>	<p>Where necessary to take steps to enter into the employment contract with the applicant</p>	<p>Emails are maintained for 1 year, unless stored in an employee file, in which case they are stored for 7 years, unless otherwise required by applicable local law where you work</p>
<p>Updating the talent pool of Sandisk, which includes incorporating applicants in Sandisk talent pool in order to inform them about new professional opportunities within the Sandisk.</p>	<p>To fulfill Sandisk’s legitimate interest after taking into account the purpose and need of processing, and balancing the interests of Sandisk with the rights of the applicant</p>	<p>Applicant files are maintained for 3 years after the close of the requisition, unless otherwise required by applicable local law where you work</p>
<p>Internal process and improvement, which includes assessing and improving the performance and success of our recruiting and hiring process, analysing best recruitment practices, making Sandisk a great place to work.</p>	<p>To fulfil Sandisk’s legitimate interest in improving its recruiting and hiring process</p>	<p>Applicant files are maintained for 3 years after the close of the requisition, unless otherwise required by applicable local law where you work</p>

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Processing activity	Legal Basis	Data Retention period
<p>Compliance with local laws, including equal opportunity laws, which includes diversity information if authorized or required by applicable local law. Note: When applicable, this may require Sandisk to process sensitive personal information about applicants, including their race, ethnicity, gender, or health information.</p>	To comply with legal obligations to which Sandisk is subject as employer	<p>Regulatory reporting is maintained for current year of report plus 6 years, unless otherwise required by applicable local law where you work</p> <p>Applicant files are maintained for 3 years after the close of the requisition, unless otherwise required by applicable local law where you work</p>
<p>Responding to accommodation requests, which includes assessing requests to accommodate applicants during the recruitment process, as well as post-hiring accommodations, where applicable. Note: Where authorized or required by applicable local law, this may require Sandisk to process sensitive personal information about applicants, including health information.</p>	To comply with legal obligations to which Sandisk is subject as employer	<p>Employee personnel files are maintained for up to 6 years after the termination of employment, unless otherwise required by applicable local law where you work</p> <p>Applicant files are maintained for 3 years after the close of the requisition, unless otherwise required by applicable local law where you work</p>
<p>Enforcing Sandisk's legal rights, which includes using personal information in connection with pre-litigation or litigation filed by or against Sandisk, reporting potential violations of the applicable local law with law enforcement agencies, responding to any request by law enforcement or government agencies, and responding to court orders, subpoenas, or discovery requests, whether or not these requests were made within or outside your country.</p>	To fulfil Sandisk's legitimate interest in defending its rights and interests	<p>Legal records are maintained for 10 years after the resolution of the matter, unless otherwise required by applicable local law where you work</p> <p>Applicant files are maintained for 3 years after the close of the requisition, unless otherwise required by applicable local law where you work</p>

Sandisk will process your personal information only for one or more of the purposes outlined above, for purposes sent to Sandisk employees in a separate notice, or in other ways that applicable local law may permit.

Automated Sorting of Applicants

In certain jurisdictions, Sandisk may use data analytics and algorithms to help us to review the large quantities of candidates and application data that we receive. These algorithms help us prioritize the application review process and sort candidates based on professional characteristics that suggest strengths and capabilities necessary to perform the relevant role.

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These analytical tools do not characterize an automated individual decision-making to the extent they do not determine who is and who is not given offers of employment based solely on automated processing. Rather, Sandisk considers the results in combination with other information about the applicant, and each candidate's assessment is based on human judgment. We evaluate each individual candidate on their own merits.

Who Has Access to Your Personal Information

Your personal information can only be accessed by or disclosed to Sandisk employees who have a need-to-know, and the information they have access to is limited to the personal information that they need to perform their job. Specifically, the following employees within Sandisk will have access to your personal information:

- People Support team members;
- Those responsible about making decisions about your application for employment, such as your Talent Acquisition and those with whom you have interviewed;
- Hiring managers;
- Security personnel to the extent you have had to enter a Sandisk business location;
- Professional advisors, such as lawyers; and
- Other employees who have a legitimate business reason for processing your personal information.

Your personal information may also be shared with other corporate entities associated with Sandisk in order to globally manage the human resources within Sandisk Group.

Sandisk will not provide your personal information to a third party unless that third party undertakes to: implement and maintain appropriate security measures; comply with applicable local laws; only use your personal information where required and for the purposes for which your personal information was provided by Sandisk; and guarantee at least the same levels of protection for your personal information as required by Sandisk. We may also share your information with former employers to obtain a reference or confirm employment history.

Sandisk stores your personal information in various business applications. Your personal information may be accessed by providers of those systems for administrative, technical and operational purposes.

Sandisk may provide your personal information to local regulators in order to comply with legal obligations. Your personal information may be provided to law enforcement agencies or to law firms in connection with any legal proceedings or in response to subpoenas or similar requests. Similarly, Sandisk may be under an obligation to disclose your personal information to regulators, courts, the police or local authorities, or in the course of litigation. It may not be possible to notify you in advance about the details of such disclosures. In such cases, Sandisk will use all reasonable efforts to disclose the minimum personal information necessary.

Finally, Sandisk may also provide your personal information to successor businesses in the event of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets.

Where Sandisk Transfers Your Personal Information (International Transfers)

From time to time, Sandisk transfers your personal information outside of your home country to its subsidiaries and affiliates, as well as third parties (e.g., service providers) in the US and elsewhere where there is a business need to do so and for the purposes described above.

Sandisk also transfers your personal information to third parties in Europe and around the world where required by law (e.g., to tax authorities), to protect its legal rights (e.g., to defend litigation, legal advice or audit requirements) or in an emergency (e.g., in a workplace accident where an employee's health or security is at risk).

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Where Sandisk transfers your personal information to a country that may not have the same level of privacy protection as your home country Sandisk will ensure that the transfer is covered by appropriate safeguards (for example, by entering into standard contractual clauses as adopted by the European Commission or the UK Data Protection Authority), and will implement measures to act in accordance with applicable data protection laws. If you want more information about the potential third countries where your personal information is transferred and obtain a copy of the associated safeguards, you can reach out Sandisk's Data Protection Officer (DPO) by email at privacy@sandisk.com.

Sandisk Security Measures

Sandisk is committed to taking appropriate technical, physical and organizational measures to protect employee personal information against the following: unauthorized or accidental destruction; alteration or disclosure; accidental loss; unauthorized access; misuse; unlawful collection/use; and damage.

Your Rights and How You Exercise Them

Depending on the laws of your jurisdiction, you may have certain rights with respect to your personal information:

Your rights	Scope
Right to access	You have the right to request (i) the confirmation on whether Sandisk processes your personal information or not, (ii) a copy of such personal information, and (iii) information on the use of your personal information by Sandisk (as provided in this Notice).
Right to rectification	You have the right to request the rectification of your personal information if your personal information is obsolete, inaccurate or incomplete.
Right to delete	Under certain circumstances, you have the right to request the deletion of your personal information.
Right to restriction of processing	Under certain circumstances, you have the right to request the restriction of the processing.
Right to portability	Under certain circumstances, you have the right to request a copy of your personal information in a structured, commonly used and machine-readable format and also can request their transmission to another data controller where technically feasible.
Right to object	Under certain circumstances, you have the right to object to our processing of your personal information.
Right to withdraw your consent	You have the right to withdraw your consent when it has been obtained.

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Automated individual decision-making	You have the right not to be subject to a decision based solely on automated processing including profiling, which produces legal effects on you or similarly significantly affects you.
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Depending on your country of residence, you may have additional local rights with respect to our processing of your personal information. For example, if you are based in France, you can [define either](#) general or specific guidelines regarding your personal information in the event of your death (e.g. their deletion or transmission to any person of your choice).

You also have the right to lodge a complaint before your national data protection authority. For those in Europe and the UK, please see the list and the contact of the data protection authorities [here](#). Sandisk does not prohibit applicants from lodging a complaint with the relevant government office if a Sandisk applicant has any concerns with the processing of their personal information. Please feel free to directly contact Sandisk before discussing with regulators, so that any issue may be resolved in cases of mistakes.

If you have any questions or wish to exercise your rights, you can reach out Sandisk's Data Protection Officer (DPO) by email at privacy@sandisk.com.

Under certain circumstances, Sandisk may ask you for specific information in order to confirm your identity and ensure the exercise of your rights. This is another appropriate security measure to ensure that personal data is not disclosed to an individual who does not have the right to receive it.

We will not discriminate or retaliate against you for exercising any of your privacy rights identified in this Notice.

Changes To This Notice

We may update this Notice from time to time. When we make changes to this Notice, we will change the date at the beginning of this Notice. If we make material changes to this Notice, we will notify you by email to your registered email address, by prominent posting on our websites, or through other appropriate communication channels as required by applicable local law. All changes shall be effective from the date of publication unless otherwise provided in the notification.

Questions

To ask any questions related to this Notice or Sandisk applicant and recruitment privacy practices, or to exercise any legal rights that you have related to your personal information, please contact Sandisk's Data Protection Officer (DPO) by email at privacy@sandisk.com.

You may also contact Human Resources with requests for access or regarding any complaints related to your personal information.