

TD SYNnex Applicant Privacy Statement and Terms of Use

Your engagement with the TD SYNnex Career Website is subject to this Privacy Statement and the applicable Terms of Use. Children under the age of 16 are not eligible to receive career services information. By using the functionalities on the TD SYNnex Career Site managed by TD SYNnex Corporation, Delaware, you acknowledge and agree to the processing as described in this Privacy Notice including the processing of your personal data in the US, the purposes and transfer of personal data to countries outside your country and to third parties.

Terms of Use

By using the TD SYNnex career site application tool, you agree to be bound by our Terms of Use as outlined herein. TD SYNnex reserves the right to make changes to the Terms of Use at any time.

By using the TD SYNnex career site and application tool, you expressly agree

- that the materials and information you find on this Career Site and application tool are provided "AS IS", basis without warranty of any kind, either express or implied, including without limitation any warranty for information, services or products and any implied warranties of merchantability or fitness for a particular purpose. Some States or countries do not allow the exclusion of implied warranties, so the above exclusion may not apply to you;
- to use the sites for only lawful purposes. You agree to do nothing that could compromise the security of the sites, render the sites inaccessible or otherwise cause damage to the site or their content.

Under no circumstances will TD SYNnex Corporation and its operating groups, subsidiaries and affiliates, designees, officers, directors, employees, attorneys, agents, insurers, successors or assignees be liable for any direct, indirect, special or consequential damages that result from your use of or inability to use the TD SYNnex Career Site and application tool, including but not limited to your reliance on information obtained from this website that results in mistakes, omissions, interruption, deletion or corruption of files, viruses, delays in operation or transmission or any failure of performance.

TD SYNnex Applicant Privacy Statement

Introduction

TD SYNnex Corporation and its operating groups, subsidiaries and affiliates, ("the Company", "TD SYNnex" or "we") are committed to protecting the privacy and security of personal data of all individuals including job applicants. Ownership of any information you provide will be held by TD SYNnex. We do not sell or otherwise disclose your personal data for monetary consideration or a business purpose to any third parties.

This Privacy Statement applies to the processing of personal data collected in connection with your use of the TD SYNnex Career Website, your employment application at TD SYNnex, our recruitment process and, if successful, the pre-employment/onboarding process.

TD SYNnex has certified to the US Department of Commerce that it adheres to the EU-US Data Privacy Framework Principles (EU-US DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-US DPF Principles and the UK extension to the EU-US DPF. TD SYNnex has certified to the US Department of Commerce that it adheres to the Swiss-US Data Privacy Framework Principles (Swiss-US DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-US DPF. If there is any conflict between the terms in the privacy statement and the EU-US DPF Principles and/or the Swiss-US DPF Principles, the Principles shall govern. For more information on our participation, click [here](#). To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Information specific upon the geolocation of applicants can be found in the **Supplementing Privacy Information** in **EXHIBIT 2** to this Privacy Statement.

Which personal data do we collect?

During the recruitment process we collect a range of personal data about you. This includes:

- Name, address and contact details, including email address and telephone number, country of residence, citizenship;
- Job preference and work availability;
- Gender
- Ethnicity and personal data qualifying as health data upon your consent or where the collection and processing of such personal data is otherwise permissible or required by law;
- Education, qualifications, experience, employment and career history, academic qualification certificates and professional affiliations;
- Job related information, such as compensation, employment status, entitlement to work, work or residency permits and visas;
- Skills inventory (including by way of skills assessments you may take part in, as permitted by applicable law, as part of any application process);
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
- Reference and background check information, including relevant criminal history and credit history;
- Video/photo images or audio recordings (e.g., via virtual interviews and/or CCTV footage (where applicable));
□ Conflicts of interest with TD SYNEX;
- In some regions -voluntary self-disclosure information regarding military service, demographic, veteran, and disability status for reporting purposes;
- Calendar availability;
- Results of the selection process;
- Other personal data, voluntarily provided by you during the recruitment and hiring process, for example in your CV.

In certain circumstances and depending on the country in which you are located, the Company may collect additional types of Personal data as required or permitted by law (e.g., tax identification number).

We further ask you to provide additional personal data in the context of the pre-employment – onboarding process, which may include (depending on local requirements) bank information, passport copies, social security numbers, bank information, National ID or other information as outlined in the offer letter.

From your usage of our Career Website we further collect

- Area of interest;
- LinkedIn Profile URL, the publicly available sections of your LinkedIn profile URL, if you provide it to us, and other professional websites you provide to us;
- Sector experience;
- Website, device and mobile app usage, and similar information collected via automated means, such as cookies and similar technologies;
- Any other information you choose to share via our TD SYNEX Career Website functionalities.

We collect your personal data in a variety of ways. For example, personal data might be contained in application forms, CVs, your passport or other identity documents, or collected through interviews or other forms of assessment. We may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers or recruiting companies as well as publicly available information accessible via the Internet and third-party websites, including LinkedIn. Where required by law, we will obtain your consent prior to requesting personal data from third parties.

For example, we may request personal data from third parties in connection with your application, references, and background checks (including criminal checks) and other purposes as appropriate or permitted by law.

Children's Data

TD SYNEX does not provide career services to children under the age of 16. Further, TD SYNEX does not knowingly collect information from children as defined by local law and does not target websites or career services to children.

For which purposes and on which legal basis do we process your personal data?

For applicants from countries other than Member States of the European Union, European Economic Area, Switzerland, United Kingdom, Serbia, we typically rely on your consent to the processing as described in this Privacy Notice unless our legal basis for the processing is compliance with a legal obligation or preparation of a contract/employment relationship.

We process your personal data to enable you to create a candidate profile and to administer your application with TD SYNEX via the tool. We further manage the recruitment process, including communication with you, the assessment, screening, and interview process and assess you against established criteria and other applicants in order to find the best fit for a current or future position. We also process your personal data for any subsequent job offer as well as subsequent pre-boarding to enter into an employment relationship with a confirmed candidate.

Where we process special categories of personal data, such as information about ethnic origin, health or religion or belief, we do so for equal opportunities reporting purposes, where required by law or to support the analysis and internal reporting of our diversity and inclusion initiatives in relation to recruitment, for example, we anonymize your personal data for assessing application and hiring statistics and trends based on your consent or, where permissible, our legitimate interest to support equal opportunity initiatives.

We may process health related information where we need to make reasonable adjustments to the recruitment process for applicants who have a disability, or to consider such information in regard to our obligations under disability laws.

We have to verify candidate's eligibility to work in a specific country or region before employment starts. We need to process candidate personal data and keep records of the application process to respond to and defend against potential legal claims.

We will not use your personal data for any purpose other than in the context of the recruitment process for a job offering for which you have applied, your account, as necessary for your usage of the TD SYNEX Career Website and the pre-employment phase, where applicable, except where you have asked us to do so or provide your consent. For example, when you issue a request for access to or deletion of your personal data (see **Your Rights**), we process your personal data if necessary to address this request. With your consent, we retain your personal data and match your profile with future job opportunities.

Purposes and legal basis for processing personal data

The legal basis for our processing may vary depending on the country in which you are located. Although you will not find consent listed for each processing activity below, we rely on consent for all or most of processing activities in those countries or regions where consent is the only or most appropriate legal basis for the processing of personal data.

The below overview references the Articles of the European data protection framework (GDPR) - the adequate equivalent in national/domestic Privacy Laws applicable to your personal data applies accordingly.

Purpose	Lawful basis	GDPR
Create a candidate profile and administer your application with TD SYNEX	Contract/preparation of an employment relationship Legitimate interest (to provide an effective solution addressing the needs and flexibility for a modern workplace environment and manage incoming applications efficiently in the course of the recruiting process)	Art. 6 (1) b Art. 6 (1) d
Process your application, manage the recruitment process, including the assessment, screening, and interview process and assess you against established criteria and other applicants	Contract/preparation of an employment relationship Legitimate interest (necessary to hire new employees and to maintain and develop a skilled and diverse workforce to support our business)	Art. 6 (1) b Art. 6 (1) d

Match your skills and qualifications against future job openings	Your consent Legitimate interest (necessary to hire new employees and to maintain and develop a skilled and diverse workforce to support our business)	Art. 6 (1) a Art. 6 (1) d
Pre-employment activities	Contract/preparation of an employment relationship	Art. 6 (1) b
Equal opportunities reporting purposes (or to support the analysis and internal reporting of our diversity and inclusion initiatives in relation to recruitment, for example, we anonymize your personal data for assessing application and hiring statistics and trends.	Legal obligation Your consent Legitimate interest (necessary to ensure equal rights and diversity in our workplace)	Art. 9 (2) b Art. 9 (2) a Art. 6(1) d
To make reasonable adjustments to the recruitment process for applicants who have a disability	Legal obligation Your consent	Art. 9 (2) b Art. 9 (2) a
To verify candidate's identity and eligibility to work in a specific country or region before employment starts	Legal obligation Legitimate interest (necessary to ensure the integrity of our workforce and to avert financial and reputational damage to TD SYNEX)	Art. 6 (1) c Art. 6(1) d
To perform pre-employment / background screenings	Your consent Legal obligation Legitimate interest (necessary to ensure the integrity of our workforce and to avert financial and reputational damage to TD SYNEX)	Art. 6 (1) a Art. 9 (2) a Art. 6 (1) c Art. 6(1) d
Video interviews	Your consent Legitimate interest (necessary to streamline the hiring process and to select suitable candidates for the job profile)	Art. 6(1) a Art. 6 (1) d
Staffing decisions, financial planning and budgeting	Contract/preparation of an employment relationship Legitimate interest (necessary to maintain and develop an effective workforce)	Art. 6 (1) b Art. 6 (1) d
Make improvements to and further develop our recruitment process, practices, and websites	Legitimate interest (to provide an effective solution addressing the needs and flexibility for a modern workplace environment and manage incoming applications efficiently in the course of the recruiting process)	Art. 6 (1) d
Ensure the safety and security of our systems	Legal obligation	Art. 6 (1) c Art. 6 (1) d
	Legitimate interest (necessary to avert financial and reputational damage to TD SYNEX and applicants) We, or a third party, have a legitimate interest in carrying out the processing activity.	
Perform auditing, research, and analysis including candidate experience surveys	Your consent Legitimate interest (necessary to maintain, protect, and improve the recruitment experience in our processes and on our sites)	Art. 6 (1) a Art. 6 (1) d
Respond to and process your inquiries, complaints, disputes	Contract/preparation of an employment relationship Legitimate interest (necessary to maintain, protect, and improve the recruitment experience on our sites)	Art. 6 (1) d
Respond to you executing your rights under applicable privacy laws	Legal obligation	Art.6 (1) b
Perform aggregated data analyses (including anonymization of personal data) to evaluate engagement, trends, forecasts, gaps (where permitted by and in compliance with local law)	Your consent Legitimate interest (necessary to maintain, protect, and improve the recruitment experience on our sites)	Art. 6 (1) a Art. 6 (1) d
Comply with applicable legal requirements, industry standards and our internal policies	Contract/preparation of an employment relationship Legal obligation Legitimate interest (necessary to hire new employees and to maintain and develop a skilled and diverse workforce to support our business)	Art. 6 (1) c Art. 6 (1) b Art. 6(1) d
Contact you via email with personalized communication and notifications about job opportunities, upcoming professional or career-related events and programs, some of which may be tailored based on your profile and/or designated interests	Your consent	Art. 6 (1) a
Personalize your interactions and experience with our recruiting and career websites	Your consent	Art. 6 (1) a

Register you and manage your account settings on the TD SYNEX Career Site and/or career-related events.	Your consent	Art. 6 (1) a
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Specific processing activities

TD SYNEX Career Site

Communication functionalities. When you subscribe to or use communication functionalities on the TD SYNEX Career Site and provide your consent to receive personalized communications and alerts regarding job opportunities and recruiting events at TD SYNEX, we ask you to provide certain personal data, such as your name, email address, phone number, location, area of interest, LinkedIn profile URL, sector experience, CV/resume and any other additional information you decide to provide (such as information included in your CV/resume).

Your Interactions with the TD SYNEX Career Site. When you visit our websites, we may collect certain information via automated means such as cookies and similar technologies. This includes your IP address, information on actions you have taken on the website, dates and times of those actions, and methods of accessing the website. We use this information to personalize your interactions and experience with our Career Site, to match your Career Site profile with future job opportunities and improve the website by assessing how many users access or use our website, which content, products, and features of our website most interest our visitors and how our service performs from a technical point of view.

We ask for your consent to place cookies and similar technologies that aren't strictly necessary for making the website work. You can manage your cookie preferences and you'll find more information about the cookies used at any time using the 'Manage Cookies' tool located at the bottom of the webpage. Your browser may also tell you how to be notified or and opt out of having certain types of cookies placed on your device. Please note, however, that you may not be able to use all the features of our websites, apps or online services, for example the chat bot functionality without enabling certain cookies.

Based upon your subscriptions on the TD SYNEX Career Site, we send you personalized communications and provide you with information about upcoming professional and/or career-related events and programs via email and text message, send you job alerts that you signed up for, and notify you of job openings at TD SYNEX that could be a good fit based on your Career Site profile.

Pre-employment -/Background Screening

Where it is permissible or required by law, or based on your consent, we may perform background checks and verification of the information provided by you once a provisional offer has been made to you. Depending on your country and the function and management level of a job offering, background screening involves verification of your identity, education, certifications, former employment. It may further include conduct search or criminal background check, checks against foreign or local sanctions lists, and checks to ensure compliance with applicable legislation on export controls, anti-money laundering and terrorism financing, trade compliance and enforcement check, social media research and director screening. For some job functions and countries, we have a legal obligation to seek information about certain criminal convictions and offences.

You can ask your recruiter for more information if and which type of pre-employment screening is relevant for the job offering you are applying for. Prior to any screening, our background screening provider will provide you with additional information about background screening including types of screening activities, personal data concerned and ask you for your consent.

Our legal basis for pre-employment screening/background checks is your consent which we obtain prior to any screening activity. However depending on function, responsibilities and management level of the job offering for which you apply as well as your country/region, background checks may be necessary for TD SYNEX complying with a legal obligation to pursue workforce due diligence, or to serve our legitimate interests to ensure the integrity of our workforce and to avert financial and reputational damage to TD SYNEX.

Video Interviews

Depending on the function and management level of job offering, we may ask you to conduct a self-recorded video interview, for Company to pre-select applicants. Our legal basis for processing the video recording personal data is - depending on your country/region – your consent or our legitimate interest.

Automated Decision Making

We do not envisage that any decisions having significant impact on you are taken based only on using automated means. There is always human intervention into decisions based on automated processing – if applicable – such as for example automated analytics, testing and profiling. However we will notify you if and where this position changes, or if there is a need and lawful base to do so.

Artificial Intelligence (AI)

TD SYNEX sometimes uses your personal data in the context of AI, for example personalizing marketing content, for data loss prevention, training and powering an AI algorithm.

Who has access to personal data?

Within the TD SYNEX organization. We share or disclose your personal data with internal recipients and other legal entities in the TD SYNEX Group where necessary for the purposes outlined above. This includes HR IT functions, HR, Talent Management, Hiring Managers and their superiors. TD SYNEX maintains centralized recruiting functions which are supporting and coordinating the recruitment process on a regional level and centrally from India and have access to application data. Only limited regional recruiting personnel together with local or regional HR, will have access to pre-employment screening results and video recordings on a need to know basis to evaluate the relevance for a job offering in view to function, responsibilities, management level.

We may share your personal data outside TD SYNEX with government authorities and/or law enforcement officials if required by law or if required to protect our legitimate interests provided we are allowed to do that by law.

Service Providers. TD SYNEX retains service providers to assist with the recruitment process or to provide IT related services and they are given access to your personal data if necessary to provide these services. You find a list of our most relevant service providers in **EXHIBIT 1**. All our service providers and partners are required to enter into contracts with us that include privacy and security terms to ensure the appropriate use and protection of personal data.

Other companies and their professional advisors. In the event we consider or decide to sell, buy, merge, reorganize or outsource all or part of the business, we may need to disclose certain information about you to these companies to facilitate or effect the transaction. We seek appropriate contractual protections from the prospective buyers or sellers in these situations and may also seek your consent where required by local law.

International data transfer

TD SYNEX is a global organization, headquartered in the United States, with affiliates and service providers located throughout the world. The TD SYNEX Career Site as well as our applicant data management system are hosted in the US and managed by TD SYNEX Corporation in the US. Your personal data is further stored in other IT systems and applications, including E-Mail.

For more information where we store your data with our major system provider, please see **EXHIBIT 1** to this Privacy Notice. Your personal data may be transferred internationally to other members of the TD SYNEX group like the central recruiting team in India as necessary to manage the recruitment process. Depending on the job offering, the Hiring Manager, Supervisor and the responsible regional recruiting team may be located in a country other than the country you are located in.

If the purposes listed above involve an international transfer of your personal data to recipients in regions other than the region you are resident in and/or the region where the personal data was originally collected, Company secures that such transfer is subject to appropriate safeguards and that your rights are protected in line with

applicable law. These regions may not ensure a level of protection for personal data equivalent to the laws applied in your region.

[For how long do we keep your personal data?](#)

We retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Statement or otherwise upon collection of your personal data, unless a longer retention period is required or allowed by law, to otherwise fulfill a legal obligation or when you have consented to us keeping the data for further job opportunities. If your application for employment is successful, personal data collected during the recruitment process will be transferred to your personnel file and retained during your employment with us. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For retention periods please see **EXHIBIT 1**.

[What if you do not provide personal data?](#)

You are under no statutory or contractual obligation to provide your personal data to us during the recruitment process. However, if you do not provide the personal data, then we may not be able to process your job application properly or at all.

[Your rights as data subject](#)

Depending on what data protection laws you are subject to, you may have the right to

- Access and obtain a copy of your personal data processed by TD SYNEX;
- Request rectification of your personal data, if inaccurate, outdated or incomplete;
- Delete or anonymize your personal data, unless an exception applies. For instance, we may need to keep your personal data to comply with legal obligations or for legal defense;
- Object to the processing of your personal data in certain circumstances. For instance, in the EU, you may object where we process your personal data because we have legitimate interest in doing so;
- Restrict the processing of your personal data, in certain circumstances. For instance, if you contest accuracy of your personal data you may request that we restrict processing of your personal data for the time enabling us to verify the accuracy of your personal data;
- Request data portability, in certain circumstances. For instance, in the EU, you may request us to transmit some of your personal data to another organization if the processing is based on your consent or a contract;
- Withdraw consent to the processing of your personal data. Please note that the withdrawal of your consent does not affect the lawfulness of the processing based on your consent given before its withdrawal. The withdrawal also does not affect the processing of your personal data which is being done by us on another legal basis than your consent (e.g. in particular if the processing is necessary for the performance of a contract, fulfilment of a legal obligation or due to other reasons stated in the valid legal regulation).

To exercise your rights please use our Data Subject Request tool [Individual Rights Requests](#) or contact Privacy@TDSYNEX.com.

When you exercise your rights as data subject, we may need to request information to confirm your identity and ensure your right to access or any of your other rights. Data Subject requests from applicants are handled centrally by TD SYNEX Corp, Privacy and HRIS team together with local/regional resources. We retain documentation about data subject requests as necessary to proof execution of your request. We delete any such documentation within 3 years after execution of the data subject request.

If you consider that the processing of your personal data infringes applicable data protection laws, you have the right to lodge a complaint to the competent Data Protection Authorities.

You can also contact our Privacy Office on any issue or question relating to the protection of your personal data at Privacy@TDSYNEX.com.

EXHIBIT 1

Scope	Service Provider	Data Center	Standard retention period*	Relevant countries/ regions
Applicant data	Workday Inc	US	6 months after notice of rejection	Austria, Croatia, Czech Republic, Denmark, Germany, Hungary, Ireland, Italy, Netherlands, Norway, Portugal, Romania, Serbia, Slovakia, Slovenia, Switzerland, United Kingdom
			2 years retention after notice of rejection	Belgium, Finland, France, Poland, Spain, Sweden, Turkey
			3 years unless other retention periods apply on national level	United States, Latin America, Canada, Asia Pacific
Pre-employment/Background Screening	Sterling Inc.	US	6 months	European Union, European Economic Area, Switzerland, United Kingdom, Turkey
			5 years	United States, Latin America, Canada, Asia Pacific

* applies unless a longer retention period is required or allowed by national law, the data is necessary to fulfill a legal obligation, for legal defense or when you have consented to us keeping the data for further job opportunities.

EXHIBIT 2 - SUPPLEMENTING PRIVACY INFORMATION REGARDING THE COLLECTION OF PERSONAL DATA FOR**A) CALIFORNIA JOB APPLICANTS**

The Company collects personal data of job applicants in connection with its recruitment and hiring activities. The Company does not sell or otherwise disclose this personal data for monetary consideration or a business purpose to any third parties. The Company is committed to complying with the California Consumer Privacy Act (CCPA) and all data privacy and laws in the jurisdictions in which it recruits and hires employees. Job applicants with disabilities may access this notice in an alternative format by contacting Accommodation@SYNNEX.com. The Company collects the information as described in the Privacy Notice to hire the best qualified applicants and to comply with applicable employment laws. If you have any questions or concerns regarding this Privacy Statement, or the collection of your personal data, please contact Privacy@TDSYNNEX.com.

If a California resident needs to submit a request for access, correction, deletion, or to opt-out of the sale or share of personal data, the request may be submitted here. Under this portal, you will be prompted to identify your request and any additional information you wish to provide. Upon submitting the request, you will receive a confirmation email that we received the request. If an authorized agent is submitting the request on behalf of a California resident, the request may be submitted through the previously mentioned portal. We will request documentation verifying your legal authority to act on behalf of the California resident.

B) JOB APPLICANTS FROM CHINA

If you are located in mainland China, you understand that we transfer the Personal data we collect about you to (or have data collected from) recipients in countries or regions other than mainland China, including in the United States, TD SYNNEX Corporation and to other affiliates. When we conduct international transfers of personal data, we will comply with requirements stipulated under applicable laws. By applying for a position with us, you will be deemed as having consented to our processing of your personal data as described in this Privacy Statement and to your personal data being stored in and shared with recipients in countries or regions other than mainland China in accordance with this Privacy Notice.

C) JOB APPLICANTS FROM MEMBERSTATES OF THE EU, EEA, UK, Switzerland, Serbia and Turkey

Data Controller

TD SYNEX Corporation, Delaware is controller for the personal data processed on the TD SYNEX Career Site and the applicant data management system together with the hiring entity or, if the hiring entity is not determined at the time of publishing the job offering, the legal entity of the hiring manager who seeks to fill the job position.

TD SYNEX Corporation and its Group Companies entered into an arrangement to duly reflect the respective roles and relationships of the joint controllers vis-à-vis the data subjects. Irrespective of the terms of the arrangement you may exercise your rights in respect of and against each of the controllers.

If you would like to learn more about which TD SYNEX entity, operating group, subsidiary and affiliate acts as data controller in connection with a job offering, which entities or third parties are involved in the processing please contact us by sending an email through to Privacy@TDSYNEX.com.

International Data Transfers

TD SYNEX complies with the EU-US Data Privacy Framework and the UK extension to the EU-US DPF, and the Swiss-US Data Privacy Framework. If personal data is transferred from the EEA, UK, or Switzerland to the US, TD SYNEX relies upon these frameworks to secure your personal data. If personal data is transferred from a member state of the European Economic Area, UK, Turkey and Switzerland to a region deemed to not provide an adequate level of protection according to European Commission, we implement appropriate contractual safeguards, such as Standard Contractual Clauses, with third parties and for intragroup transfers or apply other appropriate safeguards as approved by the European Commission and as required to secure your personal data. Further, if such third parties engage sub-processors in support of our agreement with them, the third party will be required to implement the same standards and safeguards with their sub-contractors.

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