

Appgate Applicant Privacy Notice

Scope and Overview

Appgate is committed to protecting the privacy and security of your personal data. This Applicant Privacy Notice describes how we collect, use, share, and update personal data from individuals who wish to be considered for employment. It is intended to comply with state, federal, and international privacy laws, including the EU General Data Protection Regulation (GDPR), the UK GDPR (tailored by the UK Data Protection Act 2018), and the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CPRA).

Please see the “Contact Us” section below for information on who at Appgate you can contact if you have questions about this notice.

Personal Data We Collect

For purposes of this Privacy Notice, personal data means any information that identifies or can be used to identify an individual. Personal data excludes anonymous or de-identified data that is not associated with a particular individual.

To carry out our recruitment activities, we collect, store, and process the following categories of personal data (and any additional personal data that you may supply to us):

- Identifiers such as name and contact information, including home address, phone number, and email address;
- Your resume, CV, or profile that includes your employment history, previous and relevant work experience or other experience, and education history;
- Job openings you wish to be considered for;
- Cover letter, if you choose to submit one; and
- Verification information such as citizenship, work permit status, government-issued identification, and date and place of birth.

Certain personal data elements we collect are considered “sensitive” under laws of certain jurisdictions in which we operate. Those include government identification numbers (e.g., Social Security and driver’s license numbers). We collect and use these data elements consistent with the permitted business purposes under applicable law.

Appgate does not collect information from job applicants regarding race or ethnic origin, political affiliation or opinions, religious or philosophical convictions, trade union membership, physical or mental health, marital or family status, or sexual orientation, unless the candidate has voluntarily chosen to provide such information.

How We Collect Personal Data

We collect the personal data that we process directly from you. In limited circumstances third parties may provide your personal data to us, such as former employers and other third parties that assist us with recruitment activities.

Use of Personal Data

Appgate processes various categories of personal data for the purposes discussed below and identified in this section. Our legal basis for doing so will vary with the type of data processing activity involved, and will typically include the following:

- Where necessary for Appgate to carry out its responsibilities under the employment relationship which we are discussing and/or negotiating with you;
- Where necessary for Appgate to pursue its legitimate interests or those of our clients, provided that those interests are not overridden by your interests, fundamental rights and freedoms;
- Where necessary for Appgate to comply with its legal obligations; or
- On the basis of your consent, where permitted or required by law (see below).

In particular, we use this information to assess and compare your skills, qualifications, and experience against other candidates and consider your candidacy for employment at Appgate; communicate with you about the recruitment process, your application, recruitment events, and other potential career opportunities at Appgate; inform our internal analysis and reporting on our hiring practices and make improvements to our application and recruitment process; for security and fraud detection purposes; and to comply with legal obligations.

As part of our recruitment process, we may also request verification information such as citizenship, work permit status, government-issued identification, and date and place of birth. We will use this information to verify your information and identity; conduct background checks; confirm your eligibility to work at a particular Appgate office; confirm that there are no potential conflicts of interest issues in hiring you; and begin the on-boarding process if you are hired by Appgate. In addition, where requested by you, we will use this information to assist you with obtaining an immigrant visa or work permit, if required.

Data Disclosures

We disclose your personal data with our employees, contractors, designated agents, or service providers who require such information to assist us with recruitment. Service providers may include, but are not limited to, employment background check providers, recruiting partners, and other service providers that help us manage our recruitment activities. When we contract with these entities, we do not permit them to use or disclose your information for any purpose other than the work they are doing on our behalf or as required by law.

We may also disclose your personal data to comply with legal obligations or valid legal processes, to protect the rights and property of Appgate, or for emergency/safety reasons. If a business transfer or change in ownership occurs, we may disclose information, if necessary, to complete the transaction.

For Applicants Based Outside the US: Due to the global nature of our operations, if you reside outside the U.S., your personal data may be transferred to and shared with authorized entities in the U.S. and other jurisdictions outside your home country. Any such transfers are protected by means of international data transfer agreements that incorporate the Standard Contractual Clauses approved by the European Commission or rely on other available data transfer mechanisms under applicable law.

Data Security

We have implemented appropriate physical, technical and organizational measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In

addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

Data Retention

We will retain your information in accordance with our internal records retention and management policies and procedures, including as necessary for purposes of managing our recruiting process, or as long as necessary to comply with our legal obligations. If your application for employment is successful, we will transfer some or all of the personal data we have collected about you to your Human Resources file.

Individual Rights

The rights you have depend on where you live. If you would like to exercise any of these rights, please contact us at privacy@appgate.com. We will process such requests in accordance with applicable laws, taking into consideration any relevant exceptions that may limit such rights. If there is an applicable exception, we will notify you of such exception in our response. We will not retaliate against you in any way for exercising any of these rights. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

If you live in the United Kingdom or European Economic Area, you have the following rights:

- i. Right of Access. You can ask us to give you information about our collection and use of your personal information. Specifically, you can request that we (1) confirm we are processing your information and (2) provide you one or more of the following: the purposes for the processing, the categories we process, the categories of recipients who we share your information with, and the retention period. You can also ask that we provide you, or another party you designate, a copy of your information in a commonly used, machine-readable format.
- ii. Right to Erasure. You can ask us to delete your personal information.
- iii. Right to Rectification. You can ask us to correct any inaccurate or incomplete personal information that we have about you.
- iv. Right to Restriction of Processing. You can request that we stop certain processing of your information because (1) you contest the accuracy of it or believe our processing is unlawful or (2) we only need the information for our legal claims or are evaluating your objection request.
- v. Right to Object. You can object to our processing of your personal information that we undertake for tasks in our legitimate interests.
- vi. Right to Withdraw Consent. Where you have provided your consent to the collection and processing of your personal data, you may have the legal right to withdraw your consent under certain circumstances. To do so, if applicable, contact us at privacy@appgate.com.

You also have the right to lodge a complaint with your local supervisory authority. You can find information about your data protection authority [here](#).

If you live in California, you have the following rights:

- i. Right to Know. You can ask us to give you information about our collection and use of your personal information. Specifically, you can request that we provide you one or more of the following: the categories of personal information we collected about you; the categories of sources from which we collected your personal information; our purposes for collecting your personal information; the categories of third parties to whom we disclose your personal

information; and the specific pieces of personal information we collected about you. You can also ask that we provide you, or another party you designate, a copy of your information in a commonly used, machine-readable format.

- ii. Right to Delete. You can ask us to delete your personal information that we collected from you.
- iii. Right to Correct. You can ask us to correct any inaccurate or incomplete personal information that we have about you.

You may have an authorized agent make a request on your behalf, but we will require proof of authorization from the agent and you must verify your identity with us and confirm that you gave the agent permission to submit the request on your behalf.

Appgate does not sell personal data or use it for targeted advertising (a concept known as “sharing” under California law). Accordingly, the right to opt-out of sale/sharing does not apply. Also, Appgate does not use sensitive personal information for any business purpose other than those permitted under the CPRA and implementing regulations. Accordingly, the right to limit use and disclosure of sensitive personal information does not apply.

Changes to this Privacy Notice

We reserve the right to update this Applicant Privacy Notice at any time, and we will post the latest version on our careers website at www.appgate.com/careers. If we make changes to this Applicant Privacy Notice during your recruitment process that, in our sole discretion, has a material impact on your rights with respect to how we process your personal data, we will notify you via email to the email address you provided to us. By continuing the recruitment process after those changes become effective, you agree to be bound by the revised Applicant Privacy Notice.

Contact Us

If you have any questions about our processing of your personal data or would like to make a request, please contact: privacy@appgate.com.

Effective Date: December 15, 2022