

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, update and process personal data from individuals who wish to be considered for employment. This Privacy Notices applies to job applicants only.

Please see the “Contact Us” section below for information on who at Appgate you can contact if you have questions about this notice. This Privacy Notice may change from time to time.

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;
- Employment details such as your resume, CV, or profile, as well as work experience or other experience;
- Education details such as education history, certifications and licenses, or courses taken;
- Interests or preferences such as job openings you wish to be considered for or other information you may choose to provide; 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, veteran’s status, or sexual orientation, unless the candidate has voluntarily chosen to provide such information. In certain jurisdictions, we may perform background checks with the candidate’s consent as required by law.

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 to 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. These service providers may be located outside of your home jurisdiction.

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.

Due to the global nature of our operations, your personal data may be transferred to and shared with authorized entities in jurisdictions outside your home country. Any such transfers are subject to data transfer agreements designed to ensure the confidentiality and security of your personal data, or some other legal mechanism 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.

Accessing and Correcting your Personal Information

If you would like to access, correct, or modify the personal information you have shared with us, including your contact and application information, or to exercise a right that may be available under applicable law, please contact us at privacy@appgate.com with your request. Any such request must be in writing. Please note that we will not delete any data that is required by law to fulfill our legal or regulatory obligations or if the data is necessary to exercise our legal rights.

In addition, below we provide supplemental notice about rights available in certain jurisdictions.

Residents of Argentina. You may lodge a complaint with The Agency of Access to Public Information, in its role as enforcing authority of Law 25.326.

Residents of Brazil. All sensitive personal information collected will be processed only to comply with legal or regulatory obligations (including Lei Geral de Proteção de Dados – LGPD (Law nº 13.709/2018)) or based on the consent given by you. You may withdraw your consent at any time by contacting us at privacy@appgate.com.

Residents of California. You may have an authorized agent make a request to access or correct your information, 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 CCPA and implementing regulations. Accordingly, the right to limit use and disclosure of sensitive personal information does not apply.

Residents of Colombia. In order to process your personal information, the data controller for Colombia will always obtain consent as required by applicable law. In the case that we collect sensitive information, note that providing sensitive information is optional.

Residents of the United Kingdom or European Economic Area. To the extent that processing is based on consent, you may withdraw your consent at any time. In limited circumstances, you may object or ask us to restrict the processing of your personal data. You also have the right to lodge a complaint with your local supervisory authority. You can find information about your data protection authority [here](#).

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: November 3, 2025