



Cloudflare Limited Candidate Privacy Notice

When you apply to work with Cloudflare Limited ("Cloudflare, Ltd." or "we") will collect the personal data contained in your application. In this case, we are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

This notice provides applicants (whether for an employee, worker or contractor position) with information about the personal information we collect, how and why your personal data will be used, and how long we will retain it. It also provides you with certain information that we are required to provide you with under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Your personal data will be processed for the purposes of managing our recruitment related activities, which include setting up and conducting interviews and tests for applicants, evaluating and assessing the results thereto, and as is otherwise needed in the recruitment and hiring processes. We process your information as necessary for our legitimate interests (that is, the solicitation, evaluation, and selection of applicants for employment) or (a) where we have your consent to do so.

1. Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

2. Information we collect.

In connection with your application for work with us, we will collect your personal information from you, from recruitment agencies (who may provide us with information such as CVs, and your named references. We gather, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including but not limited to name, title, address, telephone number, personal email address, date of birth, gender, employment history, and qualifications.
- Any information you provide to us during an interview.
- Test results (if applicable to the role), work sample

In some cases, we may perform a background and/or credit check. When we do that, we may collect the following categories of information from a background check provider: name, title, address, telephone number, personal email address, date of birth, employment history, national ID, references, education.

- Section 4, below, provides more information about the "special categories" of more sensitive personal information we may collect, store, and use.

3. How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to a role as it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract of employment or contract for services with you.

If you fail to provide personal information

If you fail to provide information when requested, and that information is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

4. Sensitive information we may collect, and how we use it

We may collect the following "special categories" of more sensitive personal information: information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, if you choose to give us that information and which we will hold for the purposes of diversity and equal opportunities. We will use sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

5. We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

In addition, we will collect, store, and use information about your criminal convictions history if we perform a background check. Typically, we perform background and/or credit checks if we would like to offer you the role. Such an offer is usually conditional on checks and any other conditions, such as references, being satisfactory. We are entitled to ask you to apply for a basic criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. Every role at Cloudflare requires a high degree of trust and integrity and therefore requires a criminal background check.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

6. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

7. How we may share your personal information with third parties

We share your personal information with third-party service providers with whom we have contracted for the purposes of processing your application. These service providers help us manage our recruiting and hiring processes, communicate with applicants, schedule interviews, and, when appropriate, conduct background checks. The service providers we use include:

- Greenhouse Software, Inc., a cloud services provider located in the United States of America and engaged by Controller to help manage its recruitment and hiring process on Controller's behalf.
- Talent Wall, a cloud services provider located in the United States of America and engaged by Controller to help facilitate the recruitment process on Controller's behalf.
- Interview Scheduler, a cloud services provider located in the United States of America and engaged by Controller to help manage interview scheduling on Controller's behalf.
- Hire Right, a cloud services provider located in the United States of America and engaged by Controller to help manage background checks on Controller's behalf.

When you submit your personal information to Cloudflare, Ltd., your personal data will be transferred to Cloudflare, Inc. in the United States. This transfer will be subject to appropriate additional safeguards under either the standard contractual clauses or the Privacy Shield.

All our third-party service providers and other entities in the Cloudflare group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. How we secure your data

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from privacyquestions@cloudflare.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. How long we keep your information

We will retain your personal information for a period of up to 3 years after we have communicated to you our decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with internal policies and procedures.

10. Your rights of access, correction, erasure, and restriction

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please send your request to sar@cloudflare.com in writing.

You also have the right to object to our processing of your data where we are processing such data in our legitimate interests, or to withdraw your consent for processing where our processing is based on having received your consent. To object or withdraw your consent, please contact us at sar@cloudflare.com.

11. Data protection officer

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at dpo@cloudflare.com.