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Applicant Global Privacy Notice

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Hello there and welcome to our Applicant Privacy Notice! This Notice applies to Bandwidth and its affiliates (including Voxbone, which joined Bandwidth as of November 2nd, 2020) applicants. A reference to “**Bandwidth**,” “**we**,” “**us**,” or “**our**” is a reference to Bandwidth Inc. and its affiliates and subsidiaries.

As used in this Privacy Notice, “**personal data**” means any information that relates to, describes, or could be used to identify an individual, directly or indirectly. This does not include anonymous or de-identified data, which does not relate to an identified or identifiable natural person or cannot be linked to or identify an individual.

This Applicant Privacy Notice covers how we use, store, and share personal data about you as an applicant for employment. This Notice does not cover your use of any Bandwidth product or service or any Bandwidth website.

This Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third-parties, and when we may transfer your personal data outside of your home jurisdiction. This Notice also describes your rights regarding the personal data that we hold about you including how you can

access, correct, and request erasure of your personal data. We will only process your personal data in accordance with this Notice, unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is relevant, not excessive, and processed for limited purposes.

This Notice is not intended and shall not be read to create any express or implied promise or contract for employment, or for any benefit. Nothing in this Notice should be construed to interfere with Bandwidth's ability to process applicant information for purposes of complying with its legal obligations, or for investigating alleged misconduct or violations of law, subject to compliance with internal policy and local legal requirements. Bandwidth's processing of personal data is in all cases subject to the requirements of local law and internal policy. To the extent this Notice conflicts with local law in your jurisdictions, local law shall control.

Please read this Privacy Notice carefully to understand how we handle your personal data.

Personal data that we collect

- **Personal Details.** Such as, your name, email address, address, phone number, gender (voluntary), race or ethnicity (voluntary), social media account names/profiles (as voluntarily provided by you or, if public – only applicable to US), personal website (as voluntarily provided by you or if public), desired salary, applicant visitor badge photo ID, usernames for the online application system, the information contained in your resume or CV (and other documents related to the application process, such as, cover letter, referrals, job history, performance history), details of how you heard about the position you are applying for, veteran status (voluntary), disability status (voluntary), and citizenship or immigration information for right to work, willingness to relocate.
- **Background Information.** Such as, reference contact information and reference check, social security number, government-issued identification numbers, birth date, work history, credit history (certain positions), criminal records data (to the extent required for background check in accordance with applicable law).
- **Educational Details and Training Information.** Such as, academic and professional qualifications and memberships, educational history, transcripts, certifications, skills, licenses, and in-house training attendance.
- **Security Information.** Such as, CCTV or security footage, applicant visitor badge information when you visit our offices, and information that you submit or input into our systems through completion of forms.
- **Other information.** Such as, other information you may choose to voluntarily submit to us in connection with your job application (e.g. information disclosed in an interview, phone screenings, or information you volunteer regarding your compensation history,

personal situations, etc.).

- **Device Information Collected Automatically.** Such as, IP Address, the browser you use, the pages that you visited to refer you to the application or Bandwidth website, the pages that you visited on the Bandwidth websites, and the date/time of your application.
- **Cookies and Similar Technologies.** The Bandwidth websites use cookies (small files placed on your device) and similar technologies (i.e. web beacons, tags, JavaScript, alone or in conjunction with cookies) to distinguish you from other visitors and compile information about the usage of the Bandwidth websites. See the [Bandwidth Privacy Notice](#) for more information.

[How we collect your personal data](#)

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** We will receive most of this personal data from you directly through the application process.
- **Third parties or publicly available sources.** We may also receive this information from third parties, public sources, social media (including Facebook, Instagram, Twitter, LinkedIn, along with others – only applicable to US), analytics providers, advertising networks, references, and online searches. We also may conduct lawful background screenings, through a third party vendor(s) for information about your education, employment history, credit history (for certain positions), and background check.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the application process and onboarding. You will be responsible for omissions or delays in communicating the required information.

[How we use your personal data](#)

- **Identifying and evaluating job applicants.** To assess skills, qualifications, and interests for the purposes of determining suitability for the position for which you have applied. Verify your information, background, and reference checks, where applicable, subject to your consent where required by applicable law. Communicating with you about the application process. Keeping records related to our hiring process. Analyzing and improving our application and onboarding process. In addition to using your personal data for the position for which you have applied, we may retain and use your personal data to inform you about other positions that may be appropriate for you, provided we obtain your prior consent (if required by applicable law). You will not be subject to hiring decisions based solely on automated data processing without your prior consent.
- **In the performance of a contract with you, offer letter, or other commitments we have**

made to you. For the purpose of fulfilling our obligations under your offer letter, employment contract (as applicable), other commitments we have made to you or in order to take steps at your request prior to entering into a contract or commitment. If you are offered and you accept employment with Bandwidth, the information collected during the application process will become part of your employment record.

- **Legitimate business purposes.** When necessary for legitimate purposes, such as general business management and operations, evaluate or conduct an asset transfer or M&A activity (merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some of all of Bandwidth's assets), disclosures for auditing and reporting purposes, management of network and information systems security and administration, prevent fraud, and physical security. We may also process your personal data to investigate potential violations of law or breaches of our internal policies.
- **Legal obligations.** To comply with laws, regulations, and other corporate governance requirements, including collecting and disclosing personal data as required by law (such as for minimum wage, working time, tax, health and safety, and anti-discrimination laws), in accordance with employment law specifically (e.g. for the purpose of tax calculation and salary administration) or to exercise or defend the legal rights of Bandwidth.
- **Consent.** In limited circumstances, when we received your consent. In the event our processing is based on your consent, you have the right to withdraw your consent at any time. To withdraw your consent, please use the [DATA SUBJECT RIGHT REQUEST FORM](#). Please note that withdrawal of your consent will not affect the lawfulness of the processing before the withdrawal.
- **Vital Interests.** In very exceptional circumstances, e.g. in case of a severe accident or incident, we may process your personal data when we consider it a matter of life and death.

There may be more than one ground that forms the basis of our use of your personal data. We will only use your personal data for the purposes outlined in this notice or such purposes as may be reasonably compatible with the original purpose for which it was collected or if there is an alternative legal basis for further processing.

[Collection and use of special categories of personal data](#)

The following special categories of personal data are considered sensitive under the laws of some jurisdictions and may receive special protection. We may collect and process the following special categories of personal data when you voluntarily provide them, or we receive them from a third party with your consent, when relevant for a particular position to carry out our obligations under employment law, or as applicable law otherwise permits:

- Physical or mental health condition or disability status to determine appropriate workplace accommodations and evaluate fitness for a particular position.

- Previous criminal charges or conviction where relevant for the position.

We may use sensitive personal data to comply with anti-discrimination laws and government reporting obligations. Where we have a legitimate need to process special categories of personal data about you for purposes not identified above, we will only do so after providing you with notice and, if required by law, obtaining your prior, express consent.

[How we share your personal data](#)

We will only share your personal data with third parties where required by law, or to our employees, contractors, consultants, designated agents, Bandwidth entities, or third-party service providers who require such information to assist us with administering the application and onboarding, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification, background checks, and data storage and hosting. These third-party service providers may be located outside of the country in which you live or work, or the country where the position you have applied for is located. We require our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. We only permit our third-party service providers to process your personal data for specified purposes in accordance with our instructions. If we transfer personal data to a different country, we will take appropriate measures to transfer the personal data in a legally compliant manner. We may share your personal data:

- To enable third parties or Bandwidth entities to provide services to us or act on our behalf;
- To comply with legal obligations, regulations, contracts, in response to lawful requests by public authorities;
- To seek legal advice from external lawyers and advice from other professional advisers, such as: accountants, auditors, etc.;
- As necessary to establish, exercise or defend against potential, threatened or actual litigation;
- During emergency situations or where necessary to protect the safety of persons;
- Where necessary to protect Bandwidth, your vital interest, or those of another person;
- Where the personal data is publicly available (only relevant to the US);
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Bandwidth's assets (includes potential purchaser and its legal and professional advisors);
- To protect the rights, property, or safety of our business, our employees, or others;
- and

- Otherwise in accordance with your consent, where such consent is required by law.

Data subject rights

You have certain rights regarding our processing of your personal data under applicable data protection laws. This section describes these rights and how you can exercise them. Please note these laws may provide limitations or exceptions that apply to these rights. We have described these rights generally, without noting all applicable jurisdictions, limitations, or exceptions. When you make a request to exercise any of these rights, we may provide more detailed information regarding any exceptions or limitations that apply.

- **Right to know.** You have the right to ask us to confirm whether or not we process your personal data, the categories of personal data we have collected and the sources from which we collect it, our purposes for collecting your personal data, the categories of third parties to whom we disclose your personal data, and the specific pieces of personal data we have collected about you.
- **Right to access.** You have the right to request a copy of your personal data and supplementary information.
- **Right to correction/rectification.** You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete information you believe is incomplete.
- **Right to erasure/deletion.** You have the right to request that we erase your personal data, under certain circumstances and subject to certain exceptions.
- **Right to restriction of processing.** You have the right to restrict the processing of your personal data, under certain circumstances, including, depending on applicable law and the jurisdiction in which you reside or are located, opting out of disclosures of personal information to an unaffiliated third party who does not serve as our agent or service provider, if any, or (b) use of personal information for a purpose other than the purpose for which it was originally collected or subsequently authorized if any such use occurs.
- **Right to data portability.** You have the right to receive personal data you have provided to us in a structured, commonly used and machine-readable format that allows you to transmit the data to another controller without hindrance. You also have the right to request that we transmit this data directly to another controller.
- **Right to withdrawal of consent.** Provided that the processing is based on your consent, you have the right to withdraw such consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to object to processing.** You have the right to object to the processing of your personal data at any time, under certain circumstances.
- **Right to opt out of our processing, “sale,” or sharing of personal data for targeted or cross-context behavioral advertising.** You have the right to opt out of our processing, “sale”

(as that term is broadly defined in the California Consumer Privacy Act), or sharing of your personal data for targeted or cross-context behavioral advertising, which means displaying advertising to you based on personal data obtained or inferred from your activities over time across different websites, applications, and other online services we do not operate. As detailed in the Cookies section above, you may exercise this right by visiting our [Cookie Preferences](#) to disable targeting cookies when you visit our web properties. You may also opt out of the processing or sharing of your personal data for targeted or cross-context behavioral advertising in a frictionless manner through the use of an opt-out preference signal such as Global Privacy Control. Please see the Cookies section above for additional details on how to implement these settings and other advertising preferences. Please note that even if you opt out of allowing us to use or disclose your personal data for targeted or cross-context behavioral advertising, you may still see our ads on other websites, applications, and online services, and we may still base aspects of our advertising on your interactions with us and our websites.

- **Non-Retaliation.** You have a right not to receive discriminatory treatment for exercising the rights described above.

Data controller of the applicant and onboarding personal data varies based on the country in which you reside:

US employees - Bandwidth Inc., 2230 Bandmate Way, Raleigh, North Carolina, 27607, USA

Spain employees - Bandwidth Iberia SL., Avenida de Bruselas, 15, 2ª planta, Oficina 234, Alcobendas, Madrid

UK employees - UK Bandwidth Limited, 3rd floor 1 Ashley Road, Altrincham, Cheshire, WA14 2DT, United Kingdom

Romania - Voxbone SA Bruxelles Sucursala Bucuresti, Str. Rosetti C.A. Nr. 17 București, Sect.2, 020011

Belgium, Ireland, Singapore employees - Voxbone S.A, Avenue Louise 231, 1050, Brussels, Belgium

Turkey employees - Voxbone Telekomünikasyon ve İletişim Ticaret Limited Şirketi, Armada İş Merkezi. Eskişehir Yolu No: 6 Kat: 11 Söğütözü 06520 Yenimahalle/Ankara

[Exercising your rights](#)

Except as otherwise noted above, to exercise any of the above rights or if you have any questions about this Privacy Notice, please submit them through our [DATA SUBJECT RIGHT REQUEST FORM](#). US residents may also call us toll-free at 866-824-2792.

- **Making a Request; requests by others on your behalf.** Only you, or someone legally authorized to act on your behalf (this includes an authorized agent), may make a verifiable consumer request related to your personal data using the methods described above. The response we provide will also explain the reason we cannot comply with a request, if applicable.
- **Fees.** You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- **Information we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights, such as your first and last name, email address, mailing address, telephone number, or other information necessary to verify your identity or that your representative is authorized to act on your behalf. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to assist with our response. Any personal data provided to us for verification and fraud-prevention purposes will only be used for that purpose and such information will be deleted as soon as practical after processing your consumer request.
- **Timing.** We try to respond to all legitimate requests within one month of receipt of the request. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- **Appeals.** If we refuse to take action on your request, you may appeal that refusal by contacting us through our [DATA SUBJECT RIGHT REQUEST FORM](#) or calling us toll-free at 866-824-2792

You may also make a complaint about our processing of your personal data to a relevant data protection supervisory authority. We would, however, appreciate the opportunity to address your concerns before you do so.

[International data transfers](#)

Bandwidth is a global organization, with legal entities, business practices, and technical systems that operate across borders. Your personal data may be collected, transferred to, and stored by us in the United States and by our subsidiaries and/or third-party service providers that are in other countries. Therefore, your personal data may be transferred and processed outside your jurisdiction and in countries that may not provide for the same level of data protection as your jurisdiction, such as the European Economic Area (“**EEA**”). Where applicable law requires us to utilize a data transfer mechanism, we rely on adequacy decisions as adopted by the European Commission; standard contractual clauses issued by the European Commission; or pursuant to established derogations for

specific situations.

[How long we retain your personal data](#)

We will retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for. 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, regulatory, tax, accounting or other requirements. We reserve the right to use such anonymized information (so that it can no longer be associated with you), in which case we may use this information indefinitely without further notice to you.

[How we protect your personal data](#)

Bandwidth takes precautions including administrative, technical, and physical measures to help safeguard against the accidental or unlawful destruction, loss, alteration and unauthorized disclosure of, or access to, the personal data we process or use. Please note, though, that no company can guarantee security, especially when providing services that rely on the public internet. You are solely responsible for protecting your account password(s), limiting access to your devices, and signing out of websites after your sessions. You are responsible for any activity conducted using your credentials or passwords. We ask you not to share your password with anyone and to take care when using public Wi-Fi. If you believe your password to any Bandwidth website or system has been compromised, please notify us immediately at security@bandwidth.com.

[Linked websites](#)

For your convenience, hyperlinks may be posted on our Bandwidth websites that link to other websites (“**third-party sites**”). We are not responsible for the privacy practices of any third-party sites or of any companies that we do not own or control. This Privacy Notice does not apply to third-party sites. Third-party sites may collect information in addition to that which we collect on the Bandwidth websites. We do not endorse any of these third-party sites, the services or products described or offered on such third-party sites, or any of the content contained on the third-party sites. We encourage you to read the privacy notice of each third-party site that you visit to understand how the information that is collected about you is used and protected.

[Changes to this Privacy Notice](#)

This Privacy Notice does not form part of any contract and we may update it at our discretion from time to time. When we do so, we will post the updated Privacy Notice on our careers website and update the Privacy Notice’s Effective Date at the beginning of the notice. We may

also notify you by other means prior to the changes taking effect, such as by sending you a notification or by placing a prominent notice on our careers website. We encourage you to periodically review this Privacy Notice.

[How to contact us](#)

If you have questions about this Privacy Notice, please contact the Bandwidth Privacy Team at privacy@bandwidth.com. To contact us in writing, please use:

Bandwidth Inc.
Attn: Legal – Privacy
2230 Bandmate Way
Raleigh, NC 27607 USA