



SNOWFLAKE COMPUTING, INC.

EUROPEAN ECONOMIC AREA ("EEA") RECRUITMENT PRIVACY NOTICE

Scope of privacy notice

This Recruitment Privacy Notice ("**Notice**") only applies to individuals who apply or have applied to work for Snowflake Computing, Inc. or one of its affiliates or subsidiaries ("Snowflake", "we", "our", or "us") in the EEA. This Notice explains the type of information we process, why we are processing it and how that processing may affect you.

What do we mean by "personal data" and "processing"?

"Personal data" is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

"Processing" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it or deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be "sensitive personal data".

Your personal data

We process your personal data for the purposes of fulfilling our recruitment practices. Some of the personal data that we process about you comes from you. For example, you tell us your contact details. Other personal data about you is generated from references and third-party companies such as recruitment agencies. Your personal data may be seen internally by managers, administrators and HR.

How long do we keep your personal data?

If you are successful in your application your data will be kept on your personnel file. If you are unsuccessful, your data will normally be destroyed or anonymized within twenty-four months after you have been informed that you were unsuccessful, unless you have consented to, or we have some other lawful processing basis for keeping your data for a longer period. Data such as CCTV images may be deleted after a short period.

Transfers of personal data outside the EEA

We are headquartered in the United States and, outside of the EEA we also have offices in India, and Australia. Therefore, we may transfer your personal data outside the EEA to members of our group. Where necessary these transfers are covered by an intra-group transfer agreement ensuring appropriate and suitable safeguards with our group members. If you wish to see details of these safeguards, please contact us at privacy@snowflake.net.

Contact details

In processing your data, we, and in some cases our group companies, may act as a data controller. If you have questions, please contact us at privacy@snowflake.net.

Legal grounds for processing personal data



What are the grounds for processing?

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. Two of those grounds can be summarised as Legal Obligation and Legitimate Interests. We outline what those terms mean below:

Term	Ground for processing	Explanation
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	<p>We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data.</p> <p>Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.</p>
Consent	You have given specific consent to processing your data	In general processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as background screening based on your consent.

Processing sensitive personal data

If we process sensitive personal data about you (to the extent permitted by applicable law), as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one of the grounds for processing sensitive personal data applies, including (for example) that the processing is for equality and diversity purposes to the extent permitted by law.

Further information on the data we process and our purposes

Examples of the data and the grounds on which we process data are in the table below. The examples in the table cannot, of course, be exhaustive.



Purpose	Examples of personal data that may be processed	Grounds for processing
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or background checks (if permitted by law) and any information connected with your right to work. If relevant, and to the extent permitted by law, we may also process information concerning your health, any disability and in connection with any adjustments to working arrangements.	Legal obligation Legitimate interests Consent
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin	Legitimate interests
Security	CCTV images	Legal obligation Legitimate interests
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age	Legitimate interests

Who gets to see your data?

Internal use

Your personal data may be disclosed to managers, HR and administrators for employment, administrative and management purposes as mentioned in this document. We may also disclose this to other members of our group.

External use

We will only disclose your personal data outside the group if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.

We may disclose your data if it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-riden by your interests and rights in particular to privacy). We may also disclose your personal data if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.

Specific circumstances in which your personal data may be disclosed include:



- Disclosure to external recipients of electronic communications (such as emails) which contain your personal data;
- Disclosure on a confidential basis to a potential buyer of our business or company for the purposes of evaluation — but only if we were to contemplate selling;
- Disclosure for purposes of background screening (to the extent permitted by applicable law) & checking or obtaining country specific work authorization;
- Disclosure for purposes of arranging travel or sending/receiving deliveries; and/or
- Disclosure for purposes required by applicable law, such as tax withholding reporting or responding to subpoenas.

Access to your personal data and other rights

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

You also have a legal right to make a "subject access request". If you exercise this right and we hold personal data about you, we are required to provide you with information on it, including a description and copy of the personal data and an explanation of why we are processing it.

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. You may also have the right to be given your data in a machine readable format for transmitting to another data controller though this right is unlikely to be relevant to you the context of our recruitment processes.

We are unlikely to rely on consent as a ground for processing. However, if we do, you may withdraw consent at any time — though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

Complaints

If you have complaints relating to our processing of your personal data, you should raise these with Legal in the first instance.

You may also raise complaints with the statutory regulator in your jurisdiction. The relevant statutory regulators are:

In the United Kingdom	The Information Commissioner's Office: https://ico.org.uk
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In Germany (in Bavaria)	Bayerischen Landesamt für Datenschutzaufsicht: https://www.lda.bayern.de
In France	The CNIL: https://www.cnil.fr/fr
In the Netherlands	The Autoriteit Persoonsgegevens: https://autoriteitpersoonsgegevens.nl
In Sweden	Datainspektionen: https://www.datainspektionen.se



Adoption & Revision History

Version	Changes	Owner	Date
1.0	Initial Draft	Snowflake Legal	May 24, 2018