



# Privacy Policy for Candidates

## Introduction

This Privacy Policy for Candidates (the "Policy") applies to Open Text Corporation and its affiliates (hereinafter referred to as 'OpenText', 'we', 'us', 'our') and applies to prospective, current and former candidates for employment or engagement with OpenText.

OpenText collects and processes information that identifies, relates to, describes, references, is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular candidate ("Personal Information") to manage the recruitment and hiring process. OpenText is committed in being transparent about how we collect and use the information and how we comply with applicable data protection legislation.

This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

## Information We Collect

OpenText collects and processes a range of information about you as a candidate. This regularly includes, to the extent permitted under applicable law, the following:

- contact Information and Identifiers - your name, address and contact details, including email address and telephone number; social security number, driving license number, passport number, residency/visa information and/or other similar identifiers.
- details of your education, qualifications, skills, experience, and employment/work history or performance evaluations;
- physical characteristics or description;
- if disclosed by you, whether or not you have a disability for which we need to make reasonable adjustments during the hiring process;
- protected classification characteristics – age, race, color, ancestry, national origin, citizenship, religion or creed, sex (including gender, gender identity, gender

expression, veteran or military status).

- information about your entitlement to work in any country that OpenText may consider you a candidate for;
- current and desired salary expectations;
- your image and facility access records (including CCTV) should you enter an OpenText facility;
- images or pictures attached to your resume or otherwise provided to us by you; and
- inferences drawn from other personal information – profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Where you provide personal information to OpenText about third-party individuals (e.g., information about your family, referees, emergency contacts, or any other third party) as part of your application, you should provide these individuals with a copy of this policy beforehand or ensure they are otherwise made aware of how their information will be used by OpenText. Where appropriate, we may require you to provide explicit consent on their behalf.

OpenText may collect personal information in relation to skills and/or competencies assessments in a variety of ways. For example, information might be contained in application forms, in your resume or collected through interviews (in person, on the phone or through video) or other forms of assessment, which may include online tests.

Information will be stored securely in a range of different locations, including on your application record within our Human Resources ("HR") systems and on other Information Technology ("IT") systems (including email). In some cases, hard copy records could also be stored in HR files.

## **Information Collected from Third Parties**

OpenText may collect personal information about you from third parties, such as references supplied by you, former employers, and information from background check providers, as well as information from criminal records checks if applicable and legally permissible in the country of residence. OpenText will seek information from third parties, with your consent, prior to a job offer being made and accepted by you, and OpenText will inform you before doing so.

## **How We Use Your Information**

OpenText processes personal information based on a combination of legal bases: your consent, for the performance of a contract (including steps before entering one) and/or because it has a legitimate interest during the hiring process and for keeping records of the process. Processing information from candidates allows OpenText to manage the hiring process, assess and confirm a candidate's suitability for employment or engagement and decide to whom to offer a job. OpenText may also need to process information from candidates to respond to and defend against legal claims.

OpenText may process special categories of information for US candidates, such as information about ethnic origin, sexual orientation or religion or belief, to report to the Office of Federal Contract Compliance Programs ("OFCCP"), if legally required to do so. This information is optional to provide and will not be used to make any hiring decisions. OpenText may also collect information about whether candidates require reasonable adjustments should they have disclosed this information.

For some roles, OpenText is obliged to seek information about criminal convictions and offences.

## **Who Has Access to Your Information**

Your information will be shared internally at OpenText for the purposes of hiring. This includes members of the HR and recruitment team, interviewers involved in the hiring process, managers in the business area with a vacancy and IT staff if access to the information is necessary for the performance of their roles. These also may be OpenText affiliates and vendors working on our behalf as necessary to complete your application. OpenText will not share your information with third parties, unless your application for employment or engagement is successful and an offer of employment or engagement is made, or it is otherwise required by law.

When required for legal reasons, we may share your personal information with third parties. This could include, for example, to respond to requests from public and government authorities that regulate or have jurisdiction over OpenText or to cooperate with law enforcement. In some cases, we may share your personal information to protect our rights and property, and those of our affiliates, you or others. We may share your personal information with other parties, including professional advisors, such as banks, insurance companies, auditors, lawyers and accountants.

We may also disclose or transfer your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

## **How We Share Your Information**

OpenText may share personal information with its affiliates and with vendors working on our behalf as necessary to complete your application. OpenText, its affiliates and/or vendors may be located in countries outside your country of residence. The transfer to other countries shall be in accordance with data protection legislation (to the extent it applies), which may include an adequacy decision or appropriate safeguards. Appropriate safeguards may include OpenText and third parties entering the EU Model Clauses approved by the European Commission, though this may vary based on your jurisdiction.

Where we collect personal information about you in the UK or the European Economic Area (the “EEA”), we may transfer the information to countries outside the UK or EEA for the processing purposes outlined in this policy. This may include transfers to countries that the European Commission (the “EC”) and UK data protection regulator consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Where we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as standard contractual clauses approved by the EC or UK data protection regulator, as appropriate. Where necessary, we may implement additional technical, organizational, or contractual measures to ensure an adequate level of protection for your personal information. Where required, further information concerning these safeguards can be obtained by contacting us.

## **How We Protect Your Information**

OpenText has technical and organizational measures in place to ensure the availability, integrity, and confidentiality of your personal information. In addition, we protect people and assets through physical and logical access control systems as part of an overall set of measures to meet security standards and contractual obligations.

## **How Long We Keep Your Information**

If your application for employment or engagement is unsuccessful, OpenText will generally hold your information on file for 12 months after the end of the relevant hiring process. If you agree to allow us to keep your personal information on file, we will hold your information for an additional 12 months for consideration for future employment or engagement opportunities. At the end of that period your personal information is deleted.

In all cases, information may be held for a longer period where there is a legal or regulatory reason to do so.

If you are successful in your application, information collected as part of the recruitment process may be transferred to your personnel file and retained during your employment or engagement.

## **What If You Do Not Provide Personal Information**

You are under no statutory or other obligation to provide information to OpenText during the hiring process. However, if you do not provide the information, we may not be able to process your application sufficiently or at all.

## **Automated Decision-Making**

Where you apply for an engagement or employment, we may carry out a real-time automated assessment to determine whether you are eligible for the engagement or employment. An automated assessment is an assessment carried out automatically using technological means (e.g., computer systems) without human involvement. This assessment will analyze your personal information and comprise several checks e.g., background checks and other fraud prevention checks. Where your application does not appear to meet eligible criteria, it may be automatically refused, and you will receive notification of this during the application process. However, where a decision is taken solely by automated means involving the use of your personal information, you have the right to challenge the decision and ask us to reconsider the matter, with human intervention. If you wish to exercise this right, you should contact us.

Successful candidates are required to undergo a background check, if legally applicable in the country of residence. Once this check is completed, it is reviewed by our third-party provider and can be marked as “meets company standards” automatically based on agreed upon metrics. Any report that is not automatically moved to this status is then individually reviewed by an employee of OpenText.

## **Data Subject Rights**

Your local applicable law may provide certain rights regarding the collection, use, and sharing of your personal information. As a minimum standard, we aim to enable all individuals to exercise the privacy rights set out below, but please note that these rights and the conditions for exercising and processing them (including response times) may vary depending on the jurisdiction in which you reside.

For further information, please refer to the sections “Your privacy rights” and “Contact information” in the [OpenText Privacy Policy](#).

## **Changes to our Candidate Privacy Policy**

This Policy is not contractual and OpenText reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you. You should periodically review this policy to ensure you understand how we collect and use your personal information. If the changes materially affect you, we will attempt to notify you in advance of such change, such as via a notice on our website and via email to the email address we have on file for you.

Revised: September 2025