

Recruitment Privacy Policy

This Recruitment Privacy Policy (“Recruitment Privacy Policy”) describes the collection, use, sharing, and processing of personal information by The Descartes Systems Group Inc. and its affiliates and subsidiaries (the “Descartes” or alternatively “we”, “our”, or “us”) in connection with the purposes described below.

This Recruitment Privacy Policy may be changed from time to time by Descartes in order to, amongst other things, account for changing legal requirements or to meet changing business needs. The most up-to-date version of the Recruitment Privacy Policy will always be posted at this link (www.descartes.com/privacy-policy). This Recruitment Privacy Policy was last updated on May 24, 2024.

Scope of Policy

This Recruitment Privacy Policy only applies to the collection, use, sharing, and processing of personal information of prospective employees and contractors (collectively “Applicants”) of Descartes.

This Recruitment Privacy Policy does NOT apply to personal information that is or was:

- Collected through Descartes’s publicly accessible websites, public forums, and other publicly accessible internet sites maintained by the Descartes.
- Collected from individuals attending offices, conferences, or trade show booths run by the Descartes.
- Collected from subscribers to Descartes mailing lists, email lists, newsletters, and social media channels and feeds.

What we use personal information for

Descartes uses the personal information of Applicants solely for the following purposes:

- Matching Applicants with current open positions;

- Communicating with Applicants, including providing information about our recruitment and selection procedures, scheduling interviews and/or tests, providing updates on recruitment decisions, and to communicate additional opportunities;
- Record keeping and assuring quality of service;
- To ensure the security of our network, systems, and communications;
- Training opportunities; and
- Establishing or verifying Applicant eligibility.

Personal information provided as part of the recruitment process may include data that is provided directly to Descartes by the Applicant, as well as data provided to us on behalf of the Applicant through third parties such as recruiting or employment agencies. Depending on the role we are recruiting for, the type and amount of personal information we request may vary.

What personal information is collected

Personal information is information about an identifiable individual. Depending on local law, publicly available information – such as a public directory listing of your name, address, telephone number, email or other electronic address – may not be considered personal information.

Personal information may be collected from written correspondence, such as cover letters, resumes, and emails, or from phone calls or interviews (which may occur in person or virtually and which may be recorded).

The following table provides a list of the possible categories of personal information that may be collected and processed from Applicants and why we collect it:

Categories of information	Examples	Why we need that information
Information about your identity	Legal name, aliases, date of birth, governmental or national identification number	To identify you, verify eligibility of employment, and conduct credit and/or background checks if necessary
Contact information	Email address, phone number, mailing address, or user name if registration is required	To schedule interviews and provide you updates on the recruiting process
Communications content	Contents of emails or correspondence sent to us or received by us from you	To ensure the security of our network, systems, and communications, and to detect and prevent cyber attacks or fraud.
Past employment performance and history	Previous employers, titles, roles, and responsibilities	To verify work experience and assess potential work performance
Personal and professional references	The names, contact information, and titles or roles of the person providing the reference	To verify qualifications, prior employment, and assess potential work performance
Past academic performance and history	Official and/or unofficial academic transcripts	To verify qualifications
Certifications and licenses	Licenses by regulatory authorities, evidence of professional designations	To verify qualifications and eligibility of employment
Work samples (where personal information is present)	Non-confidential copies of previous work, or work specifically developed or created based on questions or scenarios posed during recruitment process	To verify technical abilities and assess potential work performance
Travel-related records	Information such as frequent flyer numbers, itineraries, hotel, and flight information	Where applicable, to arrange or reimburse travel in connection with interviews
Sensitive personal information	Information such as race, ethnicity, and gender	To meet our equal opportunity and diversity monitoring goals or requirements, were permitted or required by law
Disciplinary or criminal history, including through a third-party background check (where applicable)	Disciplinary records from professional regulators or evidence of or the lack of prior convictions or other background information.	To verify eligibility of employment and for the safety and security of our personnel and facilities.

Duration of Processing

All Applicant personal data collected during the recruitment process and controlled by Descartes will be retained for the duration of the recruitment process, and for up to twenty-four (24) months afterward. The amount of time personal data is retained by Descartes may be affected by law or regulation which may either increase or decrease the amount of time data is retained. After the retention period the personal data will be deleted.

If you become employed or engaged by Descartes, however, your personal information may be transferred into other relevant systems for the purposes of processing salary or pay, managing your participation in our employee benefits program, and as reference material for comparative performance evaluations. The processing and disposal of that personal information will then be governed by our internal employee privacy policies and no longer governed by the Recruitment Privacy Policy.

Sharing of Information

As Descartes is a global organization, Descartes conducts recruitment activities in multiple countries and may process and transfer personal information to other Descartes companies in our worldwide operations. By providing personal information to us, you consent to us transferring your personal information to other Descartes companies in the countries where Descartes operates.

In some limited circumstances, Descartes may use a third-party data processor to process personal information. Categories of processing may include the following:

- to conduct background checks (employment, criminal, credit, and academic as applicable);
- to conduct an assessment of skill and/or competence;
- to verify legal entitlement to be employed in a specific country or region; and

- to be stored within an applicant tracking systems or other human resources information systems operated for Descartes by a third-party for later review or collaboration with other Descartes employed recruiters.

All third-parties used by Descartes to process personal information are required to use industry standard security to protect any data they have access to and may only process the information for the purpose, duration, and in the manner specified by Descartes. A list of the subprocessors used by Descartes can be found in the Supplemental Privacy Information section

(<https://www.descartes.com/legal/privacy-center/supplemental-privacy-information>). Descartes is responsible for the handling of personal information by its subprocessors. Where Descartes transfers personal information, as described above, from the European Union or United Kingdom to jurisdictions not deemed “adequate” by the European Union Commission or the Information Commissioner’s Office respectively, such transfers will be made subject to safeguards as required by law, including but not limited to Standard Contractual Clauses as approved by the appropriate regulatory authority.

In the event of an emergency or valid court order, we may also share personal information with law enforcement agencies or government regulators if permitted by law to do so.

Selling of Personal Information

Descartes does not collect any personal information for the purpose of selling that personal information. Despite this, some jurisdictions require us to make the following additional statements:

- We have not sold any personal information in the past twelve months.
- We do not sell personal information to third parties.
- We do not disclose your personal information to third parties for their own direct marketing purposes.

Sharing of Personal Information for Cross Context Advertising

Descartes does not share personal information with third parties for purposes of cross context advertising by Descartes.

Accessing your own Information

You may be entitled to request from us:

- a copy of any of your personal information which we may have;
- to update or correct any inaccuracies in your personal information that we may have;
- to request that we limit our use of your personal information, including but not limited to instructing us not using your personal information for a specific purpose;
- to erase some or all of your personal information that we do not have a legal entitlement to keep; or
- withdraw any previously provided consent for our use of your personal information.

We will not discriminate against you for exercising your rights conferred by applicable law and as described here.

You may make any such request by contacting us at dsg-privacy@descartes.com or call 1-800-419-8495. For the purposes of verifying your identity we may ask that you provide us sufficient personal details to allow us to identify you, which may include but may not be limited to your full legal name, your email address, your phone number, and/or your mailing or physical address. Such information will only be used for the purpose of verifying your identity.

In addition, while Descartes does not sell personal information to third parties, some jurisdictions still require that we provide you a means to opt out of the sale of your personal information to third parties.

Contacting the Data Protection Officer

Descartes has a global data privacy officer. If you believe your data has been used in a manner which is not consistent with this Privacy Policy or in contravention of local data privacy laws, want to appeal our decision or inaction regarding your personal information, request a copy, a deletion, an update or a correction, withdraw your consent, or if you have any questions, comments, or suggestions please contact our global data privacy officer:

Peter Nguyen, Data Privacy Officer

Mail: 120 Randall Drive, Waterloo, Ontario, Canada, N2V 1C6

Email: dsg-privacy@descartes.com