

PRIVACY NOTICE FOR EUROPEAN JOB APPLICANTS OF PLANET LABS

Last Updated: 17 December 2021

What does this notice cover?

This Privacy Notice applies to individuals who apply for employment opportunities with any subsidiaries of Planet Labs PBC, that are located in the European Economic Area and the UK ("Planet Labs", "us", "we", or "our") as data controller that processes your personal data.

This Notice also describes your data protection rights, including a right to object to some of the processing conducted by Planet Labs. More information about your rights can be found in the "Your Rights" section below.

We also may provide you with additional information when we collect personal data, when it is helpful to provide relevant and timely information.

What Personal Data We Collect

We process the following types of personal data in connection with your application, to the extent and as required or allowed under applicable laws:

- **Contact & identification information:** such as your name, address, phone, email, gender, date of birth, home address, personal email address, personal phone number and other contact details.
- **Identification information:** such as your passport number, National Insurance Number, immigration status, and nationality.
- **Information provided by or about you for recruitment purposes:** such as information contained in your resumé or CV, cover letters, transcripts, certifications, educational details, skills, work history, information available on publicly available professional profiles, and reference information collected from referees, educational institutions, professional organizations, and other individuals or organizations who may be familiar with you.
- **Family, lifestyle and social circumstances information (if we make and you accept an offer of employment):** such as beneficiaries' details in relation to life insurance or other benefits, emergency contacts, marital status, information about family members (name, date of birth, gender and national personal ID number) where necessary for the provision of applicable benefits or relocation assistance.
- **Background check information (as permitted by law):** such as information collected from employment screening agencies or publicly available registers. We may, as permitted by law and as needed for specific job roles, conduct the following background checks:
 - Criminal record checks;

- Financial integrity checks;
- Education verification;
- Employment verification;
- Directorship checks for current or previously held directorships or company secretarial positions to check for potential conflicts; and
- ID document checks to verify your identity.
- **Information about your use of our employment website:** such as information collected via cookies and similar technologies. See our website [Privacy Policy](#) for further information.
- **Special categories of personal data:** We may, in accordance with applicable law and in association with an offer of employment we may make, collect certain personal data about you that may be considered more sensitive. Such information may include:
 - information about race, ethnic origin, religion or sexual orientation for diversity monitoring purposes (for the avoidance of doubt, this will not form part of the selection process and you will not be penalized if you choose not to provide this information);
 - photograph, fingerprint or other biometric identifier for identification purposes;
 - health or disability information to provide reasonable accommodations/ adjustments (you may also choose to provide such information to us during the recruitment process); and
 - criminal background check information as discussed above.

Why We Collect, Use and Store this Personal Data

Planet Labs processes the personal data referred to above and information which you give us for the following purposes:

- managing our recruitment system;
- assessing your skills, qualifications and application against the position applied for or other positions;
- communicating with you in relation to your application and the recruitment process;
- sending you information about other positions with us that may be of interest to you;
- entering into an employment relationship with you if we offer you a position;
- operating, evaluating and improving our recruitment processes, activities and communications (this includes analyzing our job applicant base, our hiring practices, identifying qualifications or skills shortages, and using information to match candidates and potential opportunities);

- detecting, preventing and responding to fraud or potentially illegal activities, misuse of our recruitment system, intellectual property infringement or other violations of law or policy; and
- complying with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.

Our legal bases for engaging in such processing are:

- fulfilling our pre-contractual obligations to you in connection with your seeking of employment with us, and if you are hired, fulfilling our contractual obligations to you in connection with your employment contract with us;
- complying with our legal obligations, for example obtaining proof of your right to work status to enable us to meet relevant obligations;
- complying with our legal obligations to you, for example health, labor, and safety obligations that we must comply with, or to a third party (e.g., tax authorities);
- meeting our legitimate interests, for example identifying suitable candidates, protecting our interests and rights; promoting workforce diversity; and improving our recruitment processes; and
- protecting your or another person's vital interests, for example by providing your health information to a doctor in a medical emergency.

We have carried out balancing tests for all the data processing conducted on the basis of our legitimate interests, as described above. You can obtain information on any of our balancing tests by contacting us at privacy@planet.com.

As required and in accordance with applicable law, we may obtain your explicit consent to collect and use certain types of personal data (for example, when we process some categories of sensitive personal data). If we ask for your consent to process your personal data, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage the employment relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional.

How We Share Your Personal Data

We may share your personal data with other members of the Planet Labs group for recruitment purposes, as described above.

Your personal data will also be shared with companies providing services to us, such as training providers, help desk providers and IT hosting and/or IT maintenance providers.

If we make and you accept an offer of employment, your personal data will also be shared with third party benefit providers, such as for the purposes of obtaining health insurance, childcare vouchers and other applicable benefits providers and where permitted by survey service providers, investigators, employee hotline administrators and data custodians.

Personal data will also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that Planet Labs' business is sold or integrated with another business (in part or whole), your details may be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business/business unit.

Your personal data will be stored on Planet Labs PBC servers in the U.S. When we transfer your data within the Planet Labs group, we use an intra-company agreement containing European Commission-approved standard contractual clauses. When we transfer your data to organizations outside the Planet Labs organization we use European Commission-approved standard contractual clauses to safeguard the transfer, unless we transfer personal data to a third party that has implemented Binding Corporate Rules; in which case we may rely on such mechanism to safeguard the transfer.

For further information, including obtaining a copy of the documents used to protect your personal data, please contact us as described in the "Contact Us" section below.

Your Rights

You may have the right to access your personal data or to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this data to another controller.

In addition, you can object to the processing of your personal data in some circumstances.

Where we have asked for your consent, you may withdraw consent with effect for the future at any time.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the German Federal Data Protection Act. We will inform you of relevant exemptions we rely upon when responding to any request you make.

If you wish to exercise these rights, please inform us by sending an email to privacy@planet.com.

If you have concerns about the processing of your personal data conducted by us you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence or place of the alleged infringement.

How long will you retain my information?

Planet Labs will keep your personal data as necessary to accomplish our recruitment purposes, after which, we typically retain personal data, as permitted by law, for purposes of:

- Maintaining business records for analysis, understanding market trends and/or audit purposes;
- Complying with record retention requirements under the law;
- Defending or exercising our legal rights;
- Detecting and preventing fraud;
- Communicating with you about relevant employment opportunities; and
- Addressing your inquiries and requests.

We will delete your personal data when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the information.

Updates to this Privacy Notice & Policy

Planet Labs reserves the right to update this Notice at any time to reflect changes to our privacy practices. Any changes to this Notice will be posted on the “Last Updated” legend at the top of this Notice. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Notice, as required by applicable law.

Contact Us

The data controller for your personal data is the Planet Labs subsidiary hiring for the job post to which you are applying.

If you have questions about this Notice or wish to contact us for any reason in relation to the processing of your personal data, please contact us at privacy@planet.com. For Germany related matters you can also contact our German Data Protection Officer: HEC Harald Eul Consulting GmbH, Datenschutz + Datensicherheit, Auf der Höhe 34, 50321 Brühl, Germany, tel.: +49 2232-200917, e-mail: dataprotectionofficer@planet.com.

Because email communications are not always secure, please do not include sensitive information in your emails to us.