



LOGITECH CANDIDATE PRIVACY NOTICE

Last updated: February 2025

This Privacy Notice applies to the Personal Data provided by all individuals recruited by Logitech, applicants and candidates for positions at Logitech (collectively, “**Candidates**”, “**you**” or “**your**”) in connection with Logitech’s recruitment, application, and hiring processes. It applies to the privacy practices of Logitech Inc., its affiliates and subsidiaries in all countries (“**Logitech**”, “**we**”, “**us**”, “**our**”).

I. Categories of Personal Data

We receive information about you that may include information you provide to us, information we generate as part of the recruiting and application process, and information we receive about you from authorized third parties. We process Personal Data (“**Candidate Data**”) and certain special categories of Personal Data (“**Sensitive Candidate Data**”).

We process the following Candidate Data about you:

- Your name, surname, private telephone numbers, private email addresses and similar data about you (“**Master Data**”);
- Your home address, citizenship, work authorization status and similar data about you (“**Further Identification Data**”);
- Your CV data, education information, qualifications, previous work experience, current job title, current work location, skills, cover letter information, professional and other work-related licenses, memberships, permits and certifications held, and similar data about you (“**Application Data**”);
- Your salary information, bonus and commission entitlements, current benefits, termination notice, potential start date, social media profile information and any other information that you elect to provide to us (e.g. career objectives, employment preferences, reason to leave current job, willingness to relocate, willingness to travel, awards) and similar data about you (“**Further Application Data**”);
- Your professional and other work-related licenses, memberships, permits and certifications held, date of birth, graduation date, degree and institution, name and contact information for your references, government issued IDs, criminal records and/or credit reports, when required and as permitted under applicable law (“**Background Checks Data**”);
- Your email content, cover letter content, reference letters’ content, videocall and phone content and similar data about you (“**Communication Data**”);
- Your application information, feedback from the Talent Acquisition team in relation to the recruitment and application process, feedback from the Hiring Manager in relation to the recruitment and application process and similar data generated about your application (“**Hiring Decision Data**”);
- Your home address, proof of address, passport, government ID, work permit status, work permit or visa, accessibility requirements and any other similar data about you that may be required by local law to generate the employment contract (“**Employment Contract Required Data**”); and
- Immigration status, work authorization information and any other category of Personal Data outlined above to the extent required by and in accordance with applicable law (“**Legal Compliance Data**”).

In addition, there may be roles, such as if you are applying for a role located in the United States, where you may provide your gender, race, ethnicity, veteran status, religious affiliation, disabilities and visa status. All Logitech-initiated requests to Candidates to provide Sensitive Candidate Data, such as demographic information will be voluntary, except when required by applicable law or necessary for the purpose for which it was requested.



II. Processing Purposes

We use your information, including your Personal Data, to recruit and evaluate potential candidates, to process and evaluate applications and make hiring decisions, to conduct background checks, to communicate with you and your references, and to comply with legal requirements. We will add your Personal Data to Logitech’s global applicant tracking system. We may use your Personal Data to consider you for opportunities at Logitech that you did not specifically apply for but for which we think you might be a good fit. If we hire you, we may transfer Personal Data we collect in connection with the application and hiring process into our human resources systems, use it to manage the new-hire process, and incorporate it into your employee file.

We process your Personal Data to the extent permitted or required under applicable law, for the following purposes:

- To process your application, assess your capabilities and qualifications for a role and make hiring decisions (“**Identification of potential candidates, processing and evaluating applications and making hiring decisions**”);
- To conduct reference checks and, if we offer you a position, while conducting background checks (“**Conducting background checks**”);
- To respond to your inquiries, to communicate with you about positions that may interest you, to communicate with you about recruiting events, to communicate with you about your application, to schedule time with you, to send you updates regarding our careers website(s) and applicant tracking system, or inform you about changes to our terms & conditions and policies (“**Communicating with you**”);
- To make an offer to you and, once accepted, to generate the employment contract (“**Preparation of employment contract**”);
- To comply with Logitech’s legal obligations under applicable law, respond to legal requirements (statutes, regulations or court orders), administrative or judicial processes or contracts, including a subpoena or search warrant, to cooperate with governmental agencies or law enforcement, to the extent required by and in accordance with applicable law (“**Complying with laws and regulations**”); and
- To obtain demographic information about you, either voluntarily or as required by applicable (“**Obtaining demographic information about you**”).

III. Legal basis for the Processing of your Personal Data

Generally, we receive information about you that (i) you voluntarily provide to us as part of your application process; or (ii) we obtain from you as part of our recruitment process. For either of these, we could be directly receiving the information from you or through an authorized third party. We will only require information from you when it is necessary for the performance of the employment contract.

We rely on the following legal bases for the processing of your Personal Data:

FOR PROCESSING OF CANDIDATE DATA		
Processing Purposes	Categories of Employee Data involved	Legal basis



<p>For the purposes of identification of potential candidates, processing and evaluating applications and making hiring decision</p>	<ul style="list-style-type: none"> ● Master Data ● Further Identification Data ● Application Data ● Further Application Data ● Communication Data ● Hiring Decision Data 	<ul style="list-style-type: none"> ● Consent Justification; ● Justified Interest Justification; or ● Legal Obligation Justification.
<p>For the purposes of conducting background checks</p>	<ul style="list-style-type: none"> ● Master Data ● Further Identification Data ● Background Checks Data 	<ul style="list-style-type: none"> ● Legal Obligation Justification
<p>For the purposes of communicating with you</p>	<ul style="list-style-type: none"> ● Master Data ● Further Identification Data ● Communication Data 	<ul style="list-style-type: none"> ● Consent Justification; ● Justified Interest Justification; or ● Legal Obligation Justification.
<p>For the purposes of preparing an employment contract</p>	<ul style="list-style-type: none"> ● Master Data ● Further Identification Data ● Communication Data ● Employment Contract Required Data 	<ul style="list-style-type: none"> ● Contract Justification; or ● Legal Obligation Justification.
<p>For the purposes of complying with laws and regulations</p>	<ul style="list-style-type: none"> ● Master Data ● Further Identification Data ● Application Data ● Further Application Data ● Background Checks Data ● Communication Data ● Hiring Decision Data ● Employment Contract Required Data ● Legal Compliance Data 	<ul style="list-style-type: none"> ● Contract Justification; or ● Justified Interest Justification.
<p>For the purposes of obtaining demographic information about you</p>	<ul style="list-style-type: none"> ● Sensitive Candidate Data 	<ul style="list-style-type: none"> ● Consent Justification; or ● Legal Obligation Justification.

IV. Data transfers and recipients

1. Recipients of your Personal Data

Logitech: We may share information about you, including Personal Data, within Logitech for purposes of recruiting or evaluating candidates for a given position. We will make the information available only to individuals within Logitech with a business need to know the information, for example individuals in the



recruiting, human resources and information technology departments, and individuals evaluating you as a candidate. All Logitech employees, contingent workers and board members who access or process your Personal Data are required to comply with Logitech's privacy and security policies.

Third Party Service Providers: We may share your information, including your Personal Data with our third party service providers that enable us to provide and administer our recruiting, human resources and business functions. We require these third parties to contractually agree to safeguard the Personal Data we provide to them to an equal or greater level of protection as Logitech. Logitech will not share your Personal Data with third parties for their own commercial uses without your consent.

Merger or Sale of Our Business: We may transfer control of your information, including Personal Data, in the context of a sale, merger, or transfer of all or any part of our business.

Response to Subpoenas and Other Legal Requests: We may share your information, including Personal Data, with courts, law enforcement, or other government bodies when we believe in good faith that we legally are required to or allowed to. For example, we may share your information to meet national security or law enforcement requirements, to protect Logitech, or to respond to a court order, subpoena, discovery request, search warrant, or other law enforcement request.

Protection of Logitech and Others: We may share your information, including Personal Data, when we believe it is appropriate to protect the rights, property, or safety of Logitech, our products or services, our customers, our Candidates or others as permitted under applicable law.

Aggregate Information: We may share your information in a form that does not identify you individually, such as in aggregate and/or de-identified form, internally within Logitech, with governmental entities or with other third parties. We may share aggregated and/or de-identified information for purposes such as research, reporting and benchmarking.

2. Cross-Border Data Transfers

We transfer your Employee Data outside of the country where you are located.

a) For EEA/UK/CH Candidates

We will only transfer your Personal Data from the European Economic Area (“**EEA**”), the United Kingdom (“**UK**”) and Switzerland (“**CH**”) to countries outside these, on the basis of appropriate safeguards. When Logitech transfers data internationally we rely on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR and UK GDPR), ii) Standard Contractual Clauses issued by the European Commission, these are available upon request to privacy@logitech.com, and iii) EU-U.S. Data Privacy Framework (“**EU-U.S. DPF**”), the UK Extension to the EU-U.S. DPF, and the Swiss-US Data Privacy Framework (“**Swiss-U.S. DPF**”) as set forth by the U.S. Department of Commerce.

Logitech and its U.S. affiliates and subsidiaries (Logitech) has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Logitech has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

See below the list of Logitech U.S. affiliates and subsidiaries also adhering to the EU-U.S. DPF



Principles, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF Principles:

1. Logitech Inc.
2. Logitech Latin America Inc.

Logitech has responsibility for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as an agent on its behalf. Logitech shall remain liable under the DPF Principles if its agent processes such personal information in a manner inconsistent with the DPF Principles, unless Logitech proves that it is not responsible for the event giving rise to the damage.

The Federal Trade Commission (FTC) has jurisdiction over Logitech's compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

b) For China Candidates

We will collect and store your Personal Data in China. We will only transfer your Personal Data outside of China on the basis of appropriate safeguards with your consent.

V. Security of your Personal Data

Logitech uses technical and organizational security methods to protect the Personal Data of its Candidates from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. For example, we restrict and control access to Personal Data for defined personnel, Human Resources and business uses as strictly required.

VI. Your Data Controller

The Data Controller is the entity that is primarily responsible for the personal data that is collected, used and otherwise processed. Logitech Europe S.A. is the Data Controller of your personal data for the purposes described and the legal bases justified within this Privacy Notice.

VII. Retention periods for and deletion of your Personal Data

Logitech takes reasonable steps to maintain the Personal Data of our Candidates in a manner that preserves its accuracy and integrity. We will retain and use your Personal Data in compliance with Logitech's records and information management policies, to comply with our obligations under applicable laws and regulations, and to resolve disputes and enforce our agreements.

We will retain your Personal Data for 18 months or no longer than is necessary to carry out the purposes provided in this Privacy Notice and/or as required or permitted by applicable law.

VIII. Your rights and choices

You may have the rights described below:

- **Right of access:**
 - You can ask for an explanation of what data we have about you and how we use the data.
 - You can ask for a copy of the data we have about you.
- **Right to rectification:**
 - If you think information we have about you is inaccurate or incomplete, you can ask us to correct it.
- **Right to deletion:**



- You can ask us to permanently delete your data. There may be data that we are required to keep to comply with applicable law.
- **Right to object:**
 - You can object to our use of your data on the basis of legitimate interest or for direct marketing. You can also ask not to make decisions about you based solely on automated processing. Except for direct marketing, we may continue to process your data if it's allowed under applicable law.
- **Right to restriction of processing:**
 - You can ask us not to process your personal data if you believe the data is inaccurate, the processing is unlawful or if you need your data for the establishment, exercise or defense of legal claims.
- **Right to portability:**
 - You can ask us to port the data you have actively or passively provided to us, where we have that data based on your consent or a contract with you and our processing of the data is automated.
- **Right to complain to the supervisory authority:**
 - You can file a complaint about our processing of personal data with your local and competent Data Protection Authority. If you are based in the EU, you may file your complaint directly with the Data Protection Commission of the Irish Supervisory Authority. Its contact information is:
Data Protection Commission
21 Fitzwilliam Square
Dublin 2
D02 RD28
Ireland
Phone: +1800 437 437, +353 (01)765 01 00

Please note that these rights might be limited under the applicable national data protection law.

In particular, for California Candidates, under the California Consumer Privacy Act of 2018, as amended, including by the California Privacy Rights Act of 2020 (together, CCPA), California residents have specific rights regarding Logitech's collection, use, and sharing of their personal information. We do not sell your personal information or share it for cross-behavioral advertising. You have the right to not face discrimination for exercising a right under the CCPA. If you require this Privacy Notice in an alternative format, please email privacy@logitech.com or call our toll-free number +1 800 711 8156.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Logitech commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF should first contact Logitech.

IX. How to Contact Us

If you wish to exercise your data subject rights, resolve enquiries, complaints or if you have questions, you may contact us via phone, email or postal mail using the contact information below:

- Phone: +1 646-454-3200
- Email: privacy@logitech.com
- Postal Mail: Logitech Privacy Office, Logitech Ireland Services Limited, City Gate Plaza Two, Mahon, Cork, Ireland
- Data Protection Officer (DPO): You may contact our DPO by emailing dpo@logitech.com
- German Candidates: You may contact our DPO by emailing email@iitr.de



You also have the right to lodge a complaint with the competent supervisory authority.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Logitech commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

You have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. For additional information, please visit <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>

X. Changes to this Privacy Notice

We reserve the right to amend this Privacy Notice at any time. If we make significant changes to this Privacy Notice, or in how we will use your Personal Data, we will notify you through appropriate channels, such as posting a notice on our careers website(s) or sending you a direct communication. Any changes will become effective upon posting.

We will not make any changes that are less protective of your Personal Data collected in the past without your consent.

We encourage you to periodically review this Privacy Notice to be informed of how we are protecting your Personal Data.

Thank you for your interest in Logitech.