



# Applicant Privacy Notice

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## Introduction and Definitions

The **Belkin Group of Companies** (including without limitation Belkin Limited, Belkin B.V., Belkin GmbH, Belkin SAS, Belkin Ltd. Dubai) (each individually and collectively referred to in this Notice as “Belkin”) has prepared this Applicant Privacy Notice ("**Notice**") for applicants to roles with Belkin. In connection with your application, we must process your personal data. We think that it is very important that you understand how we use your personal data, and we take our obligations in this regard very seriously. The purpose of this Notice is therefore to give you information about how Belkin collects, processes, stores and otherwise uses information about you, and your rights in relation to that information.

Belkin needs to process your personal data in order to process your application for employment. There are also statutory requirements we must comply with in relation to your application. If we are not able to carry out the processing activities we describe in this Notice, we may not be able to continue with your application. This is simply information we are obliged to provide to you as part of this Notice.

We need to ask for your specific consent to process your personal data in a particular way in certain circumstances, such as for the purpose of conducting background checks prior to you commencing employment with us, to enable relevant third parties to release information about you as part of those checks. **Please sign and complete the consent form** at the end of this Notice to confirm you consent to us processing your data for the purposes of carrying out the background checks listed.

Although we are seeking your consent in relation to certain background checks, you should note that in most cases we will process your personal data for the reasons set out in this Notice and it won't be appropriate or necessary for you to provide consent as the legal basis for processing your personal data.

When we say "Belkin", "we" or "us" in this document, we mean the Belkin entity that you're applying to work for. In addition, you will see a number of references to the "Belkin Group", which includes all other Belkin entities globally. (Details of these can be obtained [here](#)). We may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

In this Notice you will see reference to "**GDPR**" - that refers to the European Union General Data Protection Regulation which is a European law governing your rights in relation to your personal data, and how organisations should protect it.

## What categories of personal data does Belkin collect about me?

"**Personal data**" means any information relating to you. Belkin will collect, process and use the following categories and types of personal data about you, which together will be referred to as "Applicant Data"

- **identification data**, such as your name, citizenship, passport data, photo, drivers' licence information, national insurance number, health insurance and governmental retirement plan information and tax reference;
- **personal information**, such as your date and place of birth, emergency contact details, and gender;
- **contact details**, such as your home address, telephone number and email address;
- **education and work experience**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience;
- **other application data**, such as the information included in your application form/CV;
- **information collected as part of the interview process**, such as notes taken from your interview or information provided from recruitment agencies;
- **background check information**, such as information obtained through reference checks and confirmation about your work/educational background.

In addition to the collection, processing and use of the Applicant Data, Belkin collects, processes and uses the following special categories of personal information about you which we describe as "**Sensitive Applicant Data**":

- **health and medical data**, if permissible under local rules and regulations, such as information on disability;
- **criminal records data** if required under local rules and regulations, information necessary to be provided to a governmental agency for purposes of a criminal background check;
- **race or ethnicity data** such as information contained in your passport or other citizenship and right to work documentation, and information which you have voluntarily provided to Belkin;
- **sexual orientation data** where this has been provided voluntarily to Belkin.

## Why does Belkin need to collect, process and use my Applicant Data and Sensitive Applicant Data and what is the legal basis for doing so?

We collect and use Applicant Data and Sensitive Applicant Data for a variety of reasons linked to processing your application for a role with us (the "**Processing Purposes**"). However, we can only collect and use this data if we have a valid legal basis for doing so, and we are required to explain the various legal bases that we rely on to you.

One of the legal bases that we rely on to process your information is "legitimate interests". Where we talk about "legitimate interests" of Belkin or third parties, this can include:

- Assessing your suitability for employment/engagement with Belkin;
- Implementation and operation of a group-wide organisational structure and group-wide information sharing;
- Right to freedom of expression or information, including in the media and the arts;

- Prevention of fraud, misuse of company IT systems, or money laundering;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Internal Investigations;
- Compliance with our legal obligations;
- Proposed mergers and acquisitions.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

To give you the full picture, we have set out each of the reasons why we collect and use Applicant Data, i.e., the Processing Purposes, and mapped these against the different legal bases that allows us to do so.

Processing Purposes	Legal Bases
<ol style="list-style-type: none"> <li><b>1. Administering and processing your application (including processing a job offer should you be successful)</b> including identification data, contact details, information about your qualifications and employment history, and information obtained during your interview and information contained in your CV.</li> <li><b>2. To determine your eligibility for the role you applied for,</b> including identification data, contact details, information about your work and education experience, information obtained during your interview and information contained in your CV.</li> <li><b>3. Conducting background checks as part of your application,</b> including identification data, contact details, information about your qualification and employment history.</li> </ol>	<p>Processing Purposes 1 to 3:</p> <ul style="list-style-type: none"> <li>• Necessary for performing a contract with you as the data subject;</li> <li>• Legitimate interests of Belkin;</li> <li>• Compliance with legal obligations which Belkin is subject to in relation to employment law; and</li> <li>• Your consent as data subject.</li> </ul>
<ol style="list-style-type: none"> <li><b>4. Complying with applicable laws and employment-related requirements</b> along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws which involves the processing of identification data and contact details.</li> <li><b>5. Monitoring and ensuring compliance with applicable policies and procedures and laws,</b> which involves the processing of your identification data and contact details, including the operation of a whistleblowing hotline.</li> </ol>	<p>Processing Purposes 4 to 5:</p> <ul style="list-style-type: none"> <li>• Compliance with legal obligations which Belkin is subject to, particularly in relation to tax law, employment law, social security law and immigration law; and</li> <li>• Legitimate interests of Belkin.</li> </ul>

<p>6. <b>Communicating with you, Belkin employees and third parties, including informing you of future opportunities with Belkin</b> (such as existing or potential business partners, suppliers, customers, end-customers or government officials), including communicating future employment opportunities, which involves the processing of identification data and your contact details.</p>	<p>Processing Purpose 6:</p> <ul style="list-style-type: none"> <li>• Necessary for performing a contract with you as the data subject - we need to be able to communicate with you so that we needed to enter into a contract with you;</li> <li>• Legitimate interests of Belkin; and</li> <li>• Compliance with legal obligation to which data controller is subject.</li> </ul>
<p>7. <b>Responding to and complying with requests and legal demands from regulators or other authorities</b> in or outside of your home country which involves the processing of identification data and contact details.</p>	<p>Processing Purpose 7:</p> <ul style="list-style-type: none"> <li>• Compliance with legal obligations which Belkin is subject to; and</li> <li>• Legitimate interests of Belkin</li> </ul>
<p>8. <b>Complying with corporate financial responsibilities</b>, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data, contact details, information about the role you have applied for, including the role's salary and benefits.</p>	<p>Processing Purpose 8:</p> <ul style="list-style-type: none"> <li>• Legitimate interests of Belkin, i.e. we need to ensure that we manage our business effectively; and</li> <li>• Compliance with legal obligations which Belkin is subject to.</li> </ul>

Below are the Processing Purposes and corresponding Legal Bases for Sensitive Applicant Data:

Processing Purpose	Legal Bases
<p>1. <b>To accommodate your application and interview and for compliance with legal obligations</b>, we may use health and medical data.</p>	<ul style="list-style-type: none"> <li>• Your explicit consent as allowed by local data protection law; and</li> <li>• Necessary to carry out the obligations and to exercise specific rights of Belkin or you in the field of employment and social security and social protection law as permitted by local data protection law.</li> </ul>
<p>2. <b>Criminal records background checks</b> if required under local rules and regulations, may involve information necessary to be provided to a governmental agency for purposes of a criminal background check.</p>	<ul style="list-style-type: none"> <li>• Your explicit consent as allowed by local data protection law;</li> <li>• Necessary to carry out the obligations and to exercise specific rights of Belkin or you in the field of employment and social security and social protection law as permitted by local data protection law; and</li> </ul>

	<ul style="list-style-type: none"> <li>• Necessary for reasons of substantial public interest as permitted by local data protection law.</li> </ul>
<p>3. <b>Equal opportunities monitoring and diversity monitoring and initiatives</b> may involve us using race or ethnicity data such as information contained in your passport or other citizenship and right to work documentation, or sexual orientation data where this has been provided voluntarily to Belkin.</p>	<ul style="list-style-type: none"> <li>• Necessary for reasons of substantial public interest as permitted by local data protection law; and</li> <li>• Your explicit consent as allowed by local data protection law.</li> </ul>

## Who might Belkin share my personal information with?

As you may know, we are part of the global Belkin Group, and several entities in this group are involved in the Processing Purposes. To ensure that the Processing Purposes can be completed, your information may be shared with any of the entities within the Belkin Group network. Where we do share data in this way, however, it is our policy to limit the categories of individual who have access to that personal information.

Belkin may transfer personal data to third parties, including to entities within and outside the Belkin Group located in any jurisdictions where Belkin Group entities are located, for the Processing Purposes as follows:

- **Within the Belkin Group.** As the Belkin entity that you are applying to is part of a wider group headquartered in California, United States with offices located across the globe, which all partially share management, human resources, legal, compliance, finance and audit responsibility, Belkin may transfer the Applicant Data and Sensitive Applicant Data to, or otherwise allow access to such data by other entities within the Belkin Group, which may use, transfer, and process the data for the following purposes: to maintain and improve effective administration of the workforce; to communicate information about the Belkin Group; to maintain a corporate directory; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.
- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to recruitment, workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Belkin Group entities and third parties that we may share your data with, please contact us as set out below.

As you may expect, some of the recipients we may share Applicant Data and Sensitive Applicant Data with may be located in countries outside of Europe. In some cases, this may include countries located outside the European Union and/or European Economic Area ("**EEA**").

Some countries where recipients may be located already provide an adequate level of protection for this data (e.g. Canada), and transfers to other countries such as the USA may be protected under arrangements such as the EU-US Privacy Shield. Nonetheless, for transfers to Belkin Group entities outside of the EEA, Belkin will be bound by the EU Standard Contractual Clauses pursuant to Article 46(2)(c) GDPR, which the European Commission has assessed as providing an adequate level of protection for personal data, to ensure that your data is protected adequately.

If recipients are located in other countries without adequate protections for personal data, Belkin will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Data Protection Clauses. You can ask for a copy of the such appropriate safeguards by contacting us as set out below ("**Who can I contact about this stuff?**").

## How long will Belkin keep my personal information for?

It is our policy not to keep personal information for longer than is necessary. We may, for example, keep your personal information for a reasonable time after your application process is completed, in case we have future job opportunities that we consider you are suitable for. Where personal information is kept, that period will be determined based on the applicable local law. For further information, please refer to the Belkin Data Retention Policy or contact us as set out below to request further details on how long Belkin will retain different categories of personal information.

## What rights do I have in respect of my personal information?

You have a number of rights in relation to your Applicant Data and Sensitive Applicant Data. These can differ by country, but can be summarised in broad terms as follows:

**(i) Right of access**

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

**(ii) Right to rectification**

You have the right to rectify inaccurate or incomplete personal data concerning you. We encourage you to review this information regularly to ensure that it is accurate and up to date.

**(iii) Right to erasure (right to be forgotten)**

You may have the right to ask us to erase personal data concerning you.

**(iv) Right to restriction of processing**

In limited circumstances, you may have the right to request that we restrict processing of your personal data, however where we process Applicant Data and Sensitive Applicant Data for the Processing Purposes we think that we have a legitimate interest in processing which may override a request that you make.

**(v) Right to data portability**

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

**(vi) Right to object and rights relating to automated decision-making**

Under certain circumstances you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we may be required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

To exercise any of these rights, please contact us as stated below (**Who can I contact about this stuff?**).

You also have the right to lodge a complaint with the competent data protection supervisory authority, which may vary depending on your location. Please click [here](#) for a list of contact details for the EEA data protection supervisory authorities.

## Who can I contact about this stuff?

If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, you can get hold of the right person here:

Belkin Limited (United Kingdom)  
Express Business Park, Shipton Way,  
Rushden, Northants NN10 6GL United Kingdom

Belkin Ltd., Dubai (UAE)  
17th Floor, Gold Tower  
Jumeirah Lake Towers  
Dubai, UAE

Belkin B.V. (Netherlands)  
Tupolevlaan 1  
1119 NW Schiphol-Rijk  
The Netherlands

Belkin (Sweden)  
Hörnåkersvägen 10  
183 65 Täby  
Stockholm, Sweden

Belkin (Sweden)  
Apartment 333  
Energigatan 11  
Varla 2:380  
Molndal Gasmataren 6  
Gothenburg, Sweden

Belkin GmbH (Germany)  
Otto-Hahn Strasse 20  
85609 Aschheim-Dornach  
Munich, Germany

Belkin SAS (France)  
Batiment J, Parc Des Reflets  
165 Avenue du Bois de la Pie  
Zac Paris Nord 2,  
Roissy en France (95)

Belkin (Denmark)  
Nordre Fasanvej  
108, 6th floor, 2000  
Frederiksberg, Denmark

The contact details of the relevant individual within our Legal Department are as follows:

Belkin Division: Jo Greenberg, [Jo.Greenberg@belkin.com](mailto:Jo.Greenberg@belkin.com)

Linksys Division: Lisa Lunger, [Anilisa.Lunger@belkin.com](mailto:Anilisa.Lunger@belkin.com)

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