



## FLEX RECRUITMENT NOTICE

### PROCESSING OF PERSONAL DATA

Flex International USA, Inc. of 6201 America Center, San Jose, CA, USA, and all other Flex group companies (hereafter Flex) takes its obligations to protect privacy and personal information very seriously.

Contact details: Your personal information is collected by Flex ("we"/"us"/"our"). If you have any questions or complaints in relation to the use of your personal information or this Recruitment Notice, you can contact our Data Privacy Officer at: [dataprotection@flex.com](mailto:dataprotection@flex.com).

**Personal Information Collected:** We collect the information below about you during the recruitment process. If you fail to provide certain information when requested, we will not be able to progress your application.

- Information provided in your curriculum vitae, application form, covering letter and during the interview process including: your name, date of birth, age, gender, home address, personal email address, education, qualification and work experience details, and references.
- Information collected or created by us during the recruitment process including: interview notes, test scores and correspondence between us.
- Information about criminal convictions: we carry out background checks as part of the recruitment process.
- Special categories of personal data including: Racial and ethnic origin information relating to disabilities, religious beliefs or sexual orientation, physical or mental health information and immigration/naturalisation records (if this discloses racial/ethnic origin information).

**Sources of Information:** This information is either (a) provided by you; (b) obtained from third parties through the application and recruitment process; (c) obtained from public sources, such as LinkedIn, or (d) created by us in the course of the recruitment process.

**How we use personal information:** We use your personal information to progress the recruitment process, to assess and make a decision about your suitability for a role, to communicate with you, and to carry out reference checks. We will also



use your information to comply with applicable legal and regulatory requirements.

**Why we use personal information:** We will use the information collected from you because:

- it is necessary for us to do so before entering into a contract with you;
- we need to process your information in order to comply with a legal or regulatory obligation.
- because we (or a third party acting at our direction and to support our business processes) have a legitimate interest to: (a) ensure the effective administration and management of the recruitment process; (b) ensure we hire a suitable individual for a role; (c) deal with disputes and accidents and take legal or other professional advice; (d) ascertain your fitness to work; and (e) if your application is successful, to administer our employment relationship with you; or
- you have consented to your personal information being retained by us for a period of up to twelve (12) months to enable us to consider you for other roles, if your application is unsuccessful.

**How we use special category personal information:** We will process your special categories of personal data: (1) to consider whether we need to provide appropriate adjustments for any disabilities during the recruitment process; (2) for equality monitoring purposes; or (3) to comply with any legal or regulatory obligation.

**Why we use special category personal information:** We will use special categories of personal information collected about you because: (1) you have provided your explicit written consent; (2) we need to do so to carry out our legal obligations; (3) it is necessary for the establishment, exercise or defence of legal claims or in relation to court cases; (4) there is a substantial public interest; or (5) it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.

**Information about criminal convictions:** As part of the recruitment process we carry out criminal background checks. We use these checks (1) to assess your suitability for a regulated role; (2) to protect your interests, our interests and third party interests; (3) because it is necessary in relation to legal claims. We are allowed to use your personal information in this way where it is necessary to carry out our



employment rights and obligations and we will always process your data in accordance with applicable local law.

**Automated decision making:** We may, as part of the recruitment process, carry out a background check about you. Depending on the results of such background check, an automated decision may be reached on whether to progress your application or offer you employment. Currently this happens in Ireland and Italy.

In Ireland, we use automated decision making because the Irish Aviation law prohibits us from employing individuals who will be involved in manufacturing of avionics if they fail to meet the relevant criteria required by the law. Your application will not be progressed if your background check reveals that you fail to meet that criteria.

In Italy, automated decision making is used only to the extent permitted by local law and only where: (1) the nature of the position you are applying to justifies such decision; and/or (2) the customer to which you will be allocated / assigned as a result of your employment with us has required us not to progress the application of individuals who fail to meet the criteria which are provided to us by the customer.

If you disagree with the decision, you can contest this by contacting us at: [dataprotection@flex.com](mailto:dataprotection@flex.com).

**Information that we share:** We will only share your personal information with the following third parties for the purposes of processing your application: (1) employment agencies, (2) background check and online test providers, and (3) regulators and competent authorities. We will also share personal data within our group for the purposes of administration, accounting and reporting purposes.

**Retention of your information:** We will retain your personal information for the duration of the recruitment process and for the length of any applicable limitation period for claims which might be brought against us later. Additionally, if your application is (1) successful we will retain your personal information to administer our employment relationship with you, or (2) unsuccessful and you have consented to your personal information being held by us for a period of up to twelve (12) months to enable us to consider you for other roles, we will retain your personal information for that period.

**Where your information will be held:** If you are a data subject within the European Economic Area (EEA), we may transfer the personal information we collect about you in the EEA to other Flex entities outside the EEA for the purposes of management and administration of the recruitment process subject to us implementing appropriate safeguards. If you are a data subject within the UK, we may transfer the personal information we collect about you in the UK to other Flex entities outside the



UK for the purposes of management and administration of the recruitment process subject to us implementing appropriate safeguards.

For transfers within Flex, we use the EU Binding Corporate Rules (for transfers from the EEA) and UK Binding Corporate Rules (for transfers from the UK). Our Data Privacy Standards (Binding Corporate Rules) including information on your third party beneficiary rights, are available here (Data Privacy Standards (EU Binding Corporate Rules)) and here (Data Privacy Standards (UK Binding Corporate Rules)).

If you would like to obtain copies of other such safeguards you can request them from us on the contact details above.

**Your rights:** You have the following rights in connection to your data: if they are applicable to you under local law: the rights of access, correction, erasure, objection, restriction, transfer, and the right to withdraw consent and to complain to a Supervisory Authority.

**Note :** While this global policy is designed to deliver consistent and efficient information to candidates on global basis , all information will always be processed in accordance with applicable local law, and data subject requests regarding personal information will be processed in accordance with applicable local law.