# **Ingram Micro Recruitment and Hiring Privacy Statement**

If you use Ingram Micro's online career resources, we collect personal data that you submit to the website and use it for recruiting-related purposes. We may also use Cookies and other tracking technology consistent with our General Privacy Statement found at (<a href="http://corp.ingrammicro.com/Privacy-Statement.aspx">http://corp.ingrammicro.com/Privacy-Statement.aspx</a>) to provide individuals with a personalized online experience, to send relevant information about careers and opportunities at Ingram Micro, and to analyze the effectiveness of our recruitment efforts and resources.

By clicking the "Accept" button during registration or by using the website, you explicitly accept, without any qualification, the collection, processing, use and transfer of all your personal data provided by you in the manner described in this Recruitment and Hiring Privacy Statement ("Privacy Statement"). You confirm that you have read this Privacy Statement carefully as it affects your legal rights and liabilities. If you do not wish to accept the terms of this Privacy Statement you must not use the website. You also confirm that you are at least 18 years' of age.

## Introduction / who is collecting your personal data?

When you apply for a job at Ingram Micro, Ingram Micro will collect and use personal data about you during the recruiting and any hiring process. As described in this Privacy Statement, your personal data may be retained and used by Ingram Micro for the purpose of considering your qualifications for employment, as required by law, or as otherwise described below. Please see below for information that Ingram Micro may receive about you from third parties.

"Ingram Micro" means the specific Ingram Micro affiliates, subsidiaries, and contracted service providers who will collect, use, and maintain your personal data in connection with your application for employment, our Recruiting, Talent Management processes, and any hiring process if you are extended an offer of employment.

#### What Personal Data will Ingram Micro collect?

The types of information requested from you and the manner in which that information is collected and accessed are determined by the requirements of the country in which the position is located, and not the country in which you reside. While, specific data requirements vary by country and the position being filled, the following categories of data will generally be collected by Ingram Micro:

- Data you submit in résumés / CVs, letters, job application forms (whether through this website or a physical form), writing samples, or other written materials;
- Data generated by interviewers and recruiters, based on their interactions with you or basic Internet searches;
- Data provided by third-party placement firms, recruiters, or job-search websites, where applicable;
- Recommendations provided on your behalf by others;

- Data about your prior employment, education, and where applicable, credit history, criminal records or other data revealed during background screenings;
- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation, subject to legal limits on the timing of collection of such data and other applicable limitations.
- Data about race / ethnicity / religion / disability / gender and self-identified LGBT status, for purposes of government reporting where required, as well as to understand the diversity characteristics of the Ingram Micro workforce.

# Your submission of personal data constitutes your consent to our use of your data and your verification that it is accurate.

By submitting your information, you acknowledge that you have read and understood the foregoing and consent to the uses of your information as set out above. You are not required to provide any requested information to Ingram Micro, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.

By submitting your information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.

#### What will Ingram Micro do with your personal data?

Ingram Micro will use your personal data to:

- Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available;
- Perform administrative functions (e.g. reimburse you for interview-related expenses);
- Perform analysis of our applicant pool in order to better understand who is applying to positions at Ingram Micro and how to attract top talent;
- In some cases, record your online interview for review by additional recruiters and hiring managers. In such cases, we will seek your express consent to be recorded;
- When you apply for a position we will enter you into a database to receive future mailings about Ingram Micro positions and events;
- Transfer your contact information (only) to the Ingram Micro Talent Connection—a site that we maintain to notify you about new positions that may be of interest to you. Your contact information will be used by the Ingram Micro Talent Connection to send you one invitation to sign up for future position alerts and invitations to Ingram Micro recruiting events, as well as one follow-up reminder. If you do not respond to these messages your contact information will be retained by the Ingram Micro Talent Connection only for the purpose of ensuring that we do not contact you again. If you join the Ingram Micro Talent Connection you will have future opportunities to opt-out of receiving messages and alerts if you choose; and
- Perform any legally-required reporting, and respond to legal process.

#### From what sources will Ingram Micro obtain your personal data?

Ingram Micro may obtain data about you from the following sources:

- From you, when you submit resumes or other information online or offline;
- From conversations with recruiters and interviews with hiring managers and other Ingram Micro personnel or representatives, some of which may be recorded (with your express knowledge and consent) as well as from Internet searches that these individuals may perform, or data that they may obtain from job search or professional networking websites (e.g. monster.com, LinkedIn, etc.) where you may have made data about yourself publicly available;
- From third-party recruiters, staffing companies, or websites where you are
  introduced to Ingram Micro through one. Ingram Micro does not accept unsolicited
  resumes from third party recruitment agencies, but does sometimes use such
  agencies subject to a written agreement. Any resume or other candidate information
  submitted outside of established candidate submission guidelines (including through
  the Careers website or via email to any Ingram Micro employee) and without a
  written agreement or otherwise will be deemed to be provided for Ingram Micro's
  use, and no fee will be paid should the candidate be hired by Ingram Micro; and
- From background checks, as applicable. Where permitted by law, Ingram Micro may contract with a third party to perform a pre-employment background screening. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. These types of information will only be collected with your prior consent, and you will receive more information about the nature of such a background check before it begins. Where required by applicable local law, you may be asked to provide certain background check information, (which may include sensitive data) directly to Ingram Micro.

#### Who will have access to your personal data? Where are they located?

In general, access to your personal data will be restricted to minimize the number of people in Ingram Micro's global organization who need it in order evaluate your application for employment, perform functions supporting our Recruiting and Talent Management functions, or to whom we are compelled to provide it by applicable law.

Where your personal data is transferred to a country other than the one in which you reside, be advised that such countries may not have the same legal protections for personal data as your home country. Ingram Micro will, however, follow its internal General Privacy Statement in such cases.

The following categories of individuals will have access to your personal data:

Recruiters working with the country where the position you are applying for is based.
 Such individuals may be based in a different country;

- Hiring managers and other interviewers. Often these individuals will be based in the country where the position is based, but in some cases they may be located in other countries;
- The global Ingram Micro Talent Management and Talent Connection teams, consisting of a limited number of individuals based in several countries;
- Individuals performing administrative and IT support functions;
- Authorized personnel at our service providers, including:
  - Jobvite, which hosts and supports the Ingram Micro Applicant Tracking System;
  - Companies contracted to perform background screenings, where applicable.
    These companies may be based in another country, and may obtain data
    from other countries where you have lived, worked or studied, as may be
    relevant as part of a background check. You will receive more information
    about any such check before it begins;
- Government officials where legal reporting requirements may exist, or law enforcement agencies or private litigants in response to valid law enforcement process (warrant, subpoena, or court order); and
- A successor to Ingram Micro in the event that it sells or divests all or part of its business.

#### **How long will Ingram Micro retain my personal data?**

If you are given and accept an offer of employment by Ingram Micro, personal data collected during your pre-employment period will become part of your Ingram Micro personnel records, to be retained throughout and for a period after your employment with Ingram Micro (specific periods vary by country). If Ingram Micro does not employ you, Ingram Micro may nevertheless continue to retain and use personal data collected during the recruitment process in order to consider you for new positions, and, if appropriate, to refer back to an earlier application if you submit a resume or other information to Ingram Micro again in the future, as well as for system administration, to perform research and analysis, and to invite you to join the Ingram Micro Talent Connection.

### How Ingram Micro protects your personal data.

Ingram Micro employs organizational, technical, and physical security measures in order to protect your data from loss or misuse. Where we contract with third-party suppliers to provide services that may enable them to access your personal data we require them by contract to have similar security controls in place.

How to obtain a copy of Ingram Micro's internal Privacy Policy, request access to your personal data or contact us with questions or feedback.

If you have a question, comment, or complaint, wish to obtain a copy of Ingram Micro's General Privacy Statement, or wish to access a copy of your personal data or to correct it if you believe it is inaccurate, you may Contact Us by emailing legaldept@ingrammicro.com.

#### For job seekers from other countries:

This Privacy Statement is also available in the following languages: English, French, Spanish, Dutch and German