

# IDEXX Applicant Personal Information Processing Notice

Last updated: May 17, 2018

## INTRODUCTION

We respect your privacy at IDEXX. This IDEXX Applicant Personal Information Processing Notice (“Applicant Notice”) tells you what you need to know about our processing of your personal data when you apply for a job at IDEXX, either as an internal or external applicant.

### *What is “personal data”?*

*Any information that relates to an identified or identifiable living person. In this Applicant Notice, “personal data” and “personal information” have the same meaning.*

This Applicant Notice applies to the processing of your personal data by IDEXX Laboratories, Inc., its affiliates or subsidiaries (“IDEXX”), and is binding to all of the IDEXX group of companies. You can find a list of IDEXX companies [here](#).

## PROCESSING YOUR PERSONAL INFORMATION What do we collect?

- Personal information provided by you, including name, surname, address, email address, phone number, gender, marital status, date and place of birth, nationality/citizenship and government-issued identifiers (if permitted under applicable law, including your Social Security number, national health, insurance number or social insurance number).
- Personal information provided by you regarding your working skills, education, certifications, curriculum vitae and employment qualifications, including information provided by previous employers and other references, if permitted under applicable law.
- Personal information provided by you when choosing to complete your professional profile in the IDEXX recruiting platform, including voluntarily uploading your professional experience, business title, education, skills, interests, picture and LinkedIn profile.
- Personal information obtained from a third-party when performing authorized reference checks, background checks or verifying personal information you provided to us, if permitted under applicable law.

## Why do we collect it?

- To fulfill our obligations as your current or prospective employer.
  - For example:
  - If you are a successful candidate, we process your personal data to begin formalizing our employment relationship.
- For making recruitment and/or employment decisions.

- *For example:*
- *To evaluate active candidates for a particular job opening*
- *To follow the progress being made in the recruitment process*
- To advance or defend IDEXX's legal rights.
- To prevent or detect fraudulent or other unlawful activities.
- To comply with a law, regulation or valid legal process and, in appropriate circumstances, cooperating with law enforcement.
- For business planning and improving our operations.
- For access control and company security.
  - *For example:*
  - *Access badges and camera footage (CCTV). We do this so we know who is in the building in the event of emergencies and to ensure that no unauthorized persons can access our offices.*
- To meet our legal obligations and pursue important corporate and social goals.
  - *For example:*
  - *Managing IDEXX's commitment to provide equal employment opportunities to qualified individuals, as described in our Code of Ethics.*

### What is our legal justification for processing it?

*“Legal justification” means that IDEXX must have a specific lawful reason for processing your personal information.*

We process your personal information based on one of the following lawful reasons:

- Processing is necessary to take specific steps before entering into a contract with you.
- Processing is necessary to comply with our legal obligations.
- Processing is necessary for achieving IDEXX's legitimate interests and do not disproportionately infringe on your privacy.
  - *An example of when we process your personal data to achieve our legitimate interest, without disproportionately infringing on your privacy, is when we choose a trusted third-party vendor to help us with the recruitment process.*
- Processing is based on your clear consent to process your personal information for a specific purpose, including when you voluntarily upload your professional profile in the IDEXX recruiting platform, where no other legal justification exists.
  - *You can withdraw consent at any time. Please see YOUR RIGHTS section of this Applicant Notice.*

### Who else might receive it?

- Your personal information is only to be processed by persons working for and on behalf of the IDEXX group of companies on a need-to-know basis for the purposes described in this Applicant Notice.
- When IDEXX hires third-party service providers for the processing of your personal information, they solely process your personal information based on our

instructions and we conclude appropriate data processor agreements with these third-party processors.

- IDEXX does not share your personal information with third parties unless required to do so by law (including external/ governmental bodies), or as reasonably necessary with trusted third parties working for us to help us administer the recruitment process.
  - *For example, we work with third-party service providers offering SaaS solutions (Software as a Service) or hosting services. We hire IT service providers that provide support to the safe and stable operation of our systems.*

## HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will not retain your personal information longer than necessary. We are guided by this Applicant Notice, internal IDEXX record retention schedules, and applicable legal obligations.

## INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

To operate our global business, we may need to transfer your personal information to countries other than your country of residence and your personal information may be transferred to, processed in, or shared within the United States, countries of the European Economic Area (EEA), or elsewhere if this is necessary to pursue our purposes for processing your personal information. We make such transfers always in accordance with this Applicant Notice.

In addition, if an EEA or Swiss-based Applicant voluntarily shares sensitive personal data with IDEXX, for example, when voluntarily uploading his/her picture on the IDEXX recruiting platform, such data could be transferred to the U.S.

### **Transferring your personal information outside European Economic Area and Switzerland:**

IDEXX Laboratories, Inc., IDEXX Distribution, Inc., IDEXX Operations, Inc. and OPTI Medical Systems, Inc. have self-certified to the EU-U.S. and the Swiss-U.S. Privacy Shield Frameworks as set forth by U.S. Department of Commerce.

Please click [here](#) to view the IDEXX Privacy Shield Notice.

Where applicable, we have taken other appropriate safeguards when transferring your personal information to a country located outside the EEA, if that country does not provide an adequate level of protection per the applicable data protection laws, including standard contractual clauses approved by the European Commission. You can contact us if you would like to receive more information on the measures we have taken to safeguard your information.

## SENSITIVE PERSONAL DATA

IDEXX limits its collection and use of sensitive personal data. When IDEXX collects EEA or Swiss sensitive personal data, it obtains your opt-in consent where the Privacy

Shield program requires, including if we disclose it to third parties or before we use such data other than for the purpose it was originally collected or you later authorized.

We may require some Applicants to undergo medical examinations in order to ensure that they are able to safely perform the essential functions of their jobs in line with all applicable laws.

## YOUR RIGHTS

- If you are an EEA resident, or IDEXX processes your personal data in the context of our activities in the EEA, you have the right under the European Union General Data Protection Regulation (GDPR) to ask questions about or request action regarding your personal data. These requests include:
  - Access to and rectification or erasure of your personal information, restriction of processing of your personal information, the right to object to processing of your personal information and portability of your personal information.
  - Withdraw your consent at any time for those processing activities that IDEXX relies on your consent as legal justification for processing it. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information before your withdrawal.
  - Lodge a complaint with a data protection supervisory authority or your own local Data Protection Agency.
- You may contact a member of the IDEXX Human Resources department for guidance or simply submit this [IDEXX E-Request](#). The form will be routed to the IDEXX privacy team for review and appropriate action as needed.
- If you reside outside of the EEA, you may have similar rights. Please contact a member of the IDEXX Human Resources Department or send an email to [chiefprivacyofficer@idexx.com](mailto:chiefprivacyofficer@idexx.com).
- No matter where in the world you reside, if you have any concerns about our handling of your personal information, please contact a member of the IDEXX Human Resources Department or send an email to [chiefprivacyofficer@idexx.com](mailto:chiefprivacyofficer@idexx.com). We will investigate and attempt to resolve all concerns by reference to the principles contained in this Applicant Notice.

## LEGAL DISCLOSURE OF INFORMATION

We may disclose your personal information to any institution, government, court, agency or authority (including law enforcement agencies) to whom we are required to disclose it by law or necessary to protect our legal rights or the rights of others, or to prevent harm, or in accordance with your instructions.

## SECURITY

We use commercially reasonable physical, procedural, and technical safeguards to deter unauthorized access, destruction, use, modification, or disclosure of your personal information. We instruct our employees that information must be handled in accordance with this Applicant Notice, and any misuse by employees may be subject to disciplinary action.

## CHANGES TO THIS APPLICANT NOTICE

It may be necessary from time to time for us to modify this Applicant Notice to reflect changes in the way we collect and use personal information or changes in privacy-related laws, regulations and industry standards. We will provide reasonable notice of material changes to the Applicant Notice, including via links posted on the IDEXX recruiting platform.

## WHO TO CONTACT

Please feel free to contact a member of the IDEXX Human Resources Department if you have any questions regarding our Applicant Notice or about the use of your personal information.

You may also contact our **Chief Privacy Officer** at the following numbers and addresses:

- Email: [chiefprivacyofficer@idexx.com](mailto:chiefprivacyofficer@idexx.com)
- Phone: 1-888-557-6518
- Mail: IDEXX Laboratories, Inc., Attention: Chief Privacy Officer, One IDEXX Drive, Westbrook, Maine 04092, U.S.A.

If you reside in the European Union, European Economic Area or Switzerland:

- Email: [chiefprivacyofficer@idexx.com](mailto:chiefprivacyofficer@idexx.com)
- Mail: IDEXX Europe B.V., Attention: Chief Privacy Officer, Scorpius 60, Building F, 2132 LR Hoofddorp, The Netherlands

IDEXX has also appointed an '**Internal Data Protection Officer – Germany**' for our German entities: Vet Med Labor GmbH (Leipzig) and IDEXX GmbH (Ludwigsburg).

- Email: [GermanyDPO@idexx.com](mailto:GermanyDPO@idexx.com)
- Mail: IDEXX Europe B.V., Attention: Internal Data Protection Officer – Germany, Scorpius 60, Building F, 2132 LR Hoofddorp, The Netherlands