Grammarly Candidate Data Privacy Notice

This Candidate Data Privacy Notice describes how Grammarly collects and processes your Personal Data when you apply for employment at Grammarly. By "Personal Data," we mean information relating to an identified or identifiable natural person.

This notice does not apply to our data practices in the context of your role as a user of Grammarly's services (our <u>Privacy Policy</u> applies there). For a short summary of what Personal Data we collect and why we collect it, see our quick table below. For more information, please keep reading our full notice.

What info?	What will Grammarly use it for?
- Identity (e.g., name, nationality)	 To process your application and determine your eligibility for the role you have applied for
- Contact info	
	- To communicate with you about future job opportunities
- Education and work experience	
	- To comply with laws, internal policies, and other obligations
- Information collected as	
part of your interview process	- To communicate with you, including connecting you to
	Grammarly employees and vendors
- Application data (e.g., info in your	
résumé and from references)	

What Personal Data do we collect and process?

We collect, store, and use Personal Data through the recruiting and hiring processes. We collect that information directly from you or (where applicable) from another person or entity, such as an employment agency, recruitment or professional networking website, background check provider, or reference. If you join our team, we will collect additional Personal Data throughout the course of engagement or employment with us.

We may collect the following information about you:

- **identification materials** such as name, addresses, telephone numbers, email addresses, photo, and government-issued identification documents (e.g., a driver's license or passport)
- **sensitive personal information** such as government identification numbers (e.g., Social Security number, Social Insurance number), COVID-19 vaccination status, and driver's license number
- **professional information**, including information provided through an application process (including in your résumé); information from interviews; recordings of your interviews (for which we would ask for your consent); work history; education history; information about skills, qualifications, experience, and preferences (e.g., mobility)

• race/ethnicity data or other personal information that you voluntarily provide to Grammarly (e.g., veteran status)

When you share your references' contact details or other Personal Data with Grammarly, please keep in mind that you have a personal responsibility to obtain consent from them.

How do we use your information?

In our recruiting process, we collect, use, share, and store Personal Data for:

- **recruiting and workforce planning**, including interviewing, communicating with candidates, job advertising for future potential roles, and selecting and hiring staff
- **legal matters and compliance**, such as complying with regulatory obligations, seeking legal advice, and responding to and cooperating with legal requests and investigations

Grammarly also processes your information for background checks to the extent permitted by applicable law. Grammarly will not process your Personal Data for performing automated decision-making.

Who do we share your Personal Data with?

Grammarly discloses your Personal Data to third parties who support our employment processes — for example, service providers for travel-booking and expenses process, vendors assisting in insurance and healthcare, payroll support services, etc. We may also disclose your information to other third parties to comply with legal obligations (including court orders and subpoenas), defend against potential, threatened, or actual litigation, or when we are legally obliged to share an employee's information with law enforcement.

How long does Grammarly store your Personal Data?

If you are hired, Grammarly will store your Personal Data for the term of your employment and for as long as permitted, including as described in our employee privacy notice (which will be provided when you are onboarded as an employee) or as required by law to comply with our legal obligations or resolve disputes.

If you are not hired, Grammarly will retain your data for two years. However, we may store your data for extended periods if a longer retention period is required by applicable law or you provide your consent to maintain your data for future recruitment at Grammarly.

If you don't want us to retain your information for consideration for other roles, please reach us at <u>recruiting.privacy@grammarly.com</u>. However, please keep in mind that Grammarly may retain your Personal Data if required by law or if we need to protect ourselves from legal claims.

How does Grammarly protect your Personal Data?

To protect the security of your Personal Data, we use state-of-the-art technical and organizational security measures, including access controls, firewalls, network intrusion detection, and more. We will not circulate your Personal Data outside of our systems or provide access to anyone not involved in our recruitment process (and, even then, only on a need-to-know basis).

EU, UK, and Switzerland residents: What is Grammarly's legal basis for processing your data?

Where applicable, the law requires Personal Data to be processed according to a legal basis. We process your Personal Data for the purposes described above based on the following legal bases:

- legitimate interests when considering you for employment, managing our recruitment process, background checks, etc.
- consent, which may be withdrawn by you at any time
- necessity to comply with our legal obligations
- necessity to protect vital interests

EU, UK, and Switzerland residents: Does Grammarly perform international data transfers?

For the purposes of Grammarly's recruitment operations, we may transfer your Personal Data internationally. International data transfers will be subject to additional safeguards under the standard contractual clauses approved by the European Commission. Please contact us at <u>recruiting.privacy@grammarly.com</u> to obtain a copy of the standard contractual clauses.

EU, UK, and Switzerland residents: What rights do you have related to your Personal Data?

Under the General Data Protection Regulation (GDPR) and the UK GDPR, you have the right to request access to your Personal Data, to request that your Personal Data be rectified or erased, and to request that the processing of your Personal Data be restricted. You also have the right to data portability. In addition, you may lodge a complaint with an EU supervisory authority.

California residents: What rights do you have related to your Personal Data?

Under the California Consumer Privacy Act, California residents have rights regarding their Personal Data. Subject to certain exceptions, you may request:

- access to your Personal Data, including the right to know the categories of Personal Data we have or will collect about you and the reason we will or have collected such information
- correction of the Personal Data that we have or will hold about you that is inaccurate
- deletion or removal of your Personal Data

There are certain exceptions to these above rights. For instance, we may retain your Personal Data if it is reasonably necessary for us (or our service providers) to provide a service that you have requested or to comply with law or to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for that activity.

We also will take reasonable steps to verify your identity before responding to a request. In doing so, we may ask you for verification information so that we can match at least two verification points with information we maintain in our files about you. If we are unable to verify you through this method, we shall have the right, but not the obligation, to request additional information from you.

California law places certain obligations on businesses that "sell" Personal Data to third parties or "share" Personal Data with third parties for cross-context behavioral advertising. We do not "sell" or "share" the Personal Data collected pursuant to this policy.

You also have the right not to be discriminated against for exercising your rights.

Questions?

We may update this policy from time to time and will post the date of last revision. If you have questions about our collection, use, or disclosure of Personal Data, or to exercise one of the rights above, please contact us by email at <u>recruiting.privacy@grammarly.com</u> or write to us at: Grammarly, Inc., 548 Market St., San Francisco, CA 94104.