

## **Global Applicant Privacy Statement**

**Issued:** February 2022

### **1. Introduction**

Expedia, Inc., together with its affiliates, ("Expedia", "we" or "us") has issued this Global Applicant Privacy Statement to describe how we handle personal information that we hold about our job applicants (referred to as "you"). The term "applicants" and "candidates" is used in this Statement to refer to anyone who applies for a job role, or who otherwise seeks to carry out work with or for us (whether on a permanent or non-permanent basis)

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This Statement sets out the personal information that we collect and process about you, the purposes of the processing and the rights that you have in connection with it. In the event of any inconsistency between your applicable law and this Statement, your applicable law will prevail.

If you are in any doubt regarding the applicable standards, have any comments or questions about this Statement or would like to see a copy of our Staff Privacy Statement, please contact us at the contact details in Section 9 below.

### **2. Types of personal information we collect and purposes of their processing**

When making an application for employment at Expedia, we may process personal information provided by you. The types of personal information we may process and the purposes include, but are not limited to, the following:

#### Personal information about Applicants:

- Identification data: civil/marital status; first and last name; photograph; date and place of birth; nationality and country of citizenship and visa details, if applicable.
- Contact details: address; telephone number (fixed and mobile); email address.
- Employment details: employment history; current job; company name; grade; geographic location.
- Academic and professional qualifications: degrees; titles; skills; language proficiency; training information.

#### Sensitive personal information about Applicants:

Sensitive personal information may include any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, health ("Sensitive Personal Information"). In certain jurisdictions social security numbers or financial information may be considered Sensitive Personal Information and so will be treated accordingly. As a general rule, we try not to collect or process any Sensitive Personal Information about you, unless authorized by law or where necessary to comply with applicable laws.

However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes:

- Inclusion and Diversity is of great importance at Expedia, however we also respect our candidates privacy. Therefore, diversity information (e.g. race, ethnicity but also sexual orientation) may be collected by a third-party service provider, where applicable and as permitted by the law to inform the Diversity and Inclusion programs and ensure our recruitment practices are inclusive, to carry out diversity and inclusion metrics, or to provide legally required information where applicable.
- Race and ethnicity may also appear indirectly on photos and other information available on passports and national IDs, which are necessary to comply with local immigration laws and for applicants' travel management in the event that you are required to do the interview in person in a different country. They may also appear on CCTV images, where in use.
- Information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job position.

- Your vaccination status (or proof of vaccination, where applicable) pursuant to the health and safety practices of our offices and local COVID-19 related regulations or guidance, to verify your vaccination status (where applicable), and to manage access to our facilities.

In such circumstances we shall ensure that such Sensitive Personal Information is collected and processed in accordance with applicable laws.

Personal information from third parties or public sources:

We also may collect information from third parties or public sources.

- For example, before and/or during your application to Expedia, we may collect your information from a member of staff who has referred you to us for a job position, where permissible and in accordance with applicable laws;
- Additionally, we may collect your information from public sources such as social media (e.g. LinkedIn) or other third-party recruitment agencies, where permissible and in accordance with applicable law.
- Furthermore, we may conduct verification via background screening (as allowed by applicable law) through a third-party vendor, which validates information about you such as past education, highest degree obtained, current and previous employers and criminal history. Please note that only successful candidates (and/or candidates in certain position) are subject to the background checks as a final verification before we may formally employ you. If applicable, you will be notified that a background screen is to be run as a pre-employment qualification when you apply for a position and during the conversation with the recruiter.

Expedia may omit your details from the shortlist for a role where you have indicated that you do not have a legal right to work in the country of application. Such a process may be automated and thus lead to you not being considered for the role in question.

We process personal information about you for the purposes indicated above but also for managing internal and external hiring process across the different group entities; selecting and scheduling meetings with you as a potential new hire; communicating with you, doing test assessments required for the job position, and to contact you in the future where you have requested to be considered for other roles. In addition, we may process your personal information for law enforcement purposes, audits, and internal investigations.

**3. Who we share your personal information with**

We may share your personal information with the following recipients or categories of recipients:

- Expedia group entities; information is shared with Expedia Group personnel with authorized access and on a need-to-know basis only (including direct potential future managers, interviewers and recruitment teams).
- Third party service providers appointed by and acting on behalf of Expedia. For example, some personal information will be available to third party companies who provide us with applicant selection / vetting services;
- Business associates and other professional advisers such as lawyers, auditors or legal representatives;
- Any person (natural or legal) or organisation to whom Expedia may be required by applicable law or regulation to disclose personal information, or to whom Expedia may have a legitimate interest to disclose personal information, including law enforcement authorities, central and local government.
- Other third parties as necessary for the following purposes: to comply with our legal obligations; to establish, exercise our rights and interests or defend against potential, threatened or actual litigation; to protect the vital interests of another person; in connection with the sale, assignment or other transfer of all or part of our business; or with your consent.

#### **4. Legal basis for processing personal information (EEA applicants only)**

If you are an applicant in the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to take steps prior to entering into an employment contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you (e.g. immigration laws) or may otherwise need the personal information to protect your vital interests or those of another person.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided at Section 9 below.

#### **5. Transfer of personal information abroad**

As we operate at a global level, we need to transfer personal information to countries other than the ones in which the information was originally collected. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws. Expedia has in place a group wide global data transfer agreement including the EU standard contractual clauses for transfers of personal information from the European Economic Area to a country outside it, such as the United States. If you wish to obtain a copy of this global data transfer agreement please contact us at the contact details in Section 9 below.

#### **6. Data retention periods**

Personal information will be stored in accordance with applicable laws and kept as long as required in order to carry out the purposes described in this Statement or as otherwise required by applicable law. If you are an unsuccessful applicant located in the EEA, we will retain your personal information for a reasonable period following the outcome of your application. We may retain your personal information for longer where you have requested to be considered for other roles. For further information on our data retention periods please contact us using the details in Section 9 below.

#### **7. Your data privacy rights**

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws which include the right: (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure if your personal information is inaccurate, no longer necessary in relation to the purposes for which it was collected, or is being unlawfully processed; (iii) to restrict or object to the processing of your personal information; and (iv) if applicable, to portability of your personal information.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

You also have a right to lodge a complaint with your local data protection authority (DPA) about our collection and use of your personal information. For more information, please contact your local DPA.

To make any such requests, please use the contact details at Section 9 below. We will consider and act upon any such requests in accordance with applicable data protection laws.

## **8. Updates to this Statement**

This Statement may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, we will inform you on the recruitment site and indicate at the top of the Statement when it was most recently updated. We encourage you to check back at this website periodically in order to be aware of the most recent version of this Statement.

## **9. Contact details**

Please address any questions or requests relating to this Statement to your recruiter or alternatively, you can raise any concerns with our VP Legal, Privacy & Data Security via [privacy@expedia.com](mailto:privacy@expedia.com).

The Data Controller of your personal data is: Expedia, Inc. and the local entity that is offering the position you're applying to.