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Candidate Privacy Notice

DOCUMENT SUBTITLE

tangoe

TANGOE

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Tangoe Candidate Privacy Notice

INTRODUCTION

Personal data is any information that could be used (directly or indirectly) to identify an individual such as name, address, email address, CV/ resume or telephone number.

Please note that this document is not broken down by country, therefore there may be some variations dependent upon the different processes and laws governing employment and data protection in each country.

We have tried to provide all the information we think you may want to know.

If you have any questions, please contact us at dataprotection@tangoe.com.

How Will Tangoe Use Your Data?

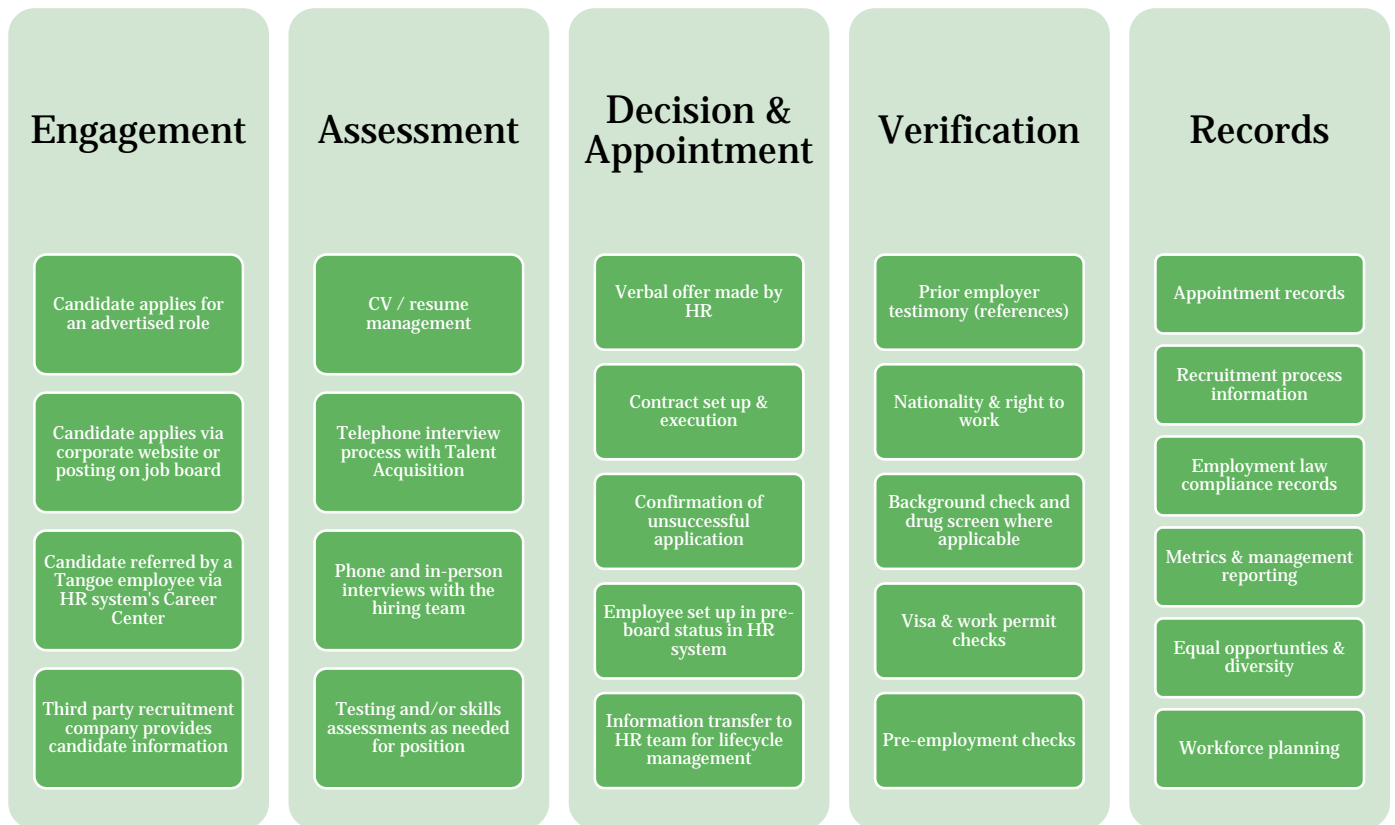
Tangoe believes in being transparent about how we use your data; there should be no surprises. We will only use your personal data for the management of your application to work with Tangoe including required legal or regulatory purposes. It will not be used for any other reason, unless we have your consent.

We will not keep your data longer than we need to and will only share it where this is essential for the processing of your employment application and, if your application is successful, for the management of your employment lifecycle or for the amount of time required by applicable law.

Tangoe will use your data to:

- Assess your skills, qualifications, and decide on suitability for a role
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process
- Create & retain records related to our recruitment processes
- Comply with legal or regulatory requirements

The recruitment process is summarized below:



What data is collected and from where?

Tangoe receives your data either directly from you via our website, a job board, publicly accessible source or a recruitment agency that you've selected to represent you.

Please note that this document is not broken down by country, therefore there may be some variations dependent upon the different processes and laws governing employment in each country.

The following data may be collected to manage the recruitment process:

Data Category	Data Type	Data Source
Personal Information	Your name, address, email address, telephone number	Applicant (provided to HR by Talent Acquisition)
	Your application form, cover letter, CV/resume, language capabilities, references from previous employers, current and/ or previous and/ or relevant work experience, education, professional licenses, certifications, professional memberships, transcripts, or other	Either directly from yourself, a third-party recruitment agency, recruitment portal, publicly accessible sources or referred by an existing Tangoe employee. This may be in the

	information you provide to us in support of an application and/ or the recruitment process	form of a resume or online application.
	References	Previous Employers (provided to Talent Acquisition by candidate)
	Nationality, visa details, work permit and right to work information	Applicant (may provide to Talent Acquisition as required)
	Details about how you heard about our open position	Applicant
	Equal opportunity and diversity monitoring information, including information about your race/ ethnic origin and gender	Applicant (provided by candidate to Talent Acquisition and then to HR)
Interview data	Information from interviews (either in-person, video conference or phone) which may include available to work date, interview dates, background, skills and relevance of these to the role, language skills	Talent Acquisition/ Hiring Manager
	Interviewers' records and opinion based on interactions in relation to suitability including evaluation score, perceived strengths & weakness, communication skills, interpersonal skills, teamwork, motivation, cultural fit, knowledge of Tangoe & industry, education/ training/ skills/ experience/ growth potential and role specific skills, in relation to the role being applied for.	Talent Acquisition/ Hiring Manager
	Records from the management and scheduling of the recruitment process	Talent Acquisition, Hiring Manager, Candidate
	Desired employment type , desired salary range and other compensation, benefit or location preferences related to your job application, availability, notice period, willingness to relocate, career progression aspirations, motivation	Talent Acquisition/ Hiring Manager/ Leadership team
	Evidence from the interview process and how this does or does not meet the required competencies. Comments, notes and opinions of the interviewers	Talent Acquisition, Hiring Manager, Team members, Leadership Team
Background Checks	Information received from background checks and drug screens (where applicable) – positive or negative status with supporting detail and medical check results (where applicable).	Talent Acquisition/ HR team
	Copies of information to support application such as certificates and qualifications	
Job Offer	Details of application and whether or not the application is successful. Record of applicant or recruitment company being informed of the decision.	Talent Acquisition/ Hiring Manager/ Leadership team

	Remuneration information including salary, benefits package, title, job location, hiring manager, start date, name, address, email, date of offer and details of any variable remuneration	
	Return of signed employment agreement/ contract and other employment documents (varies by region).	
Correspondence	Emails, letters or other communications	
Systems' Data	Candidate profile ID number, metadata and logs. Cookies and IP address potentially captured during use of Tangoe website and/ or HR system.	Systems' generated automatically
Security Data	CCTV recording and visitor records if applicant attends Tangoe offices.	
Management Reporting	Aggregate anonymous data for Equal Employment Opportunity Commission [EEOC] reporting purposes	Applicant voluntarily provides

Tangoe will not collect any data that is not directly related, required and relevant to consider your job application, or for legal and regulatory purposes.

Is All the Data Collected Mandatory?

You are not obliged to provide all the data requested by Tangoe however, depending on what data is being withheld, this may impact the success of your application. For example, if we require references for a role and you fail to provide them, we would not be able to progress your application. If you are unclear why certain data is being requested and would like to understand in more detail why this is required, or the potential impact of non-disclosure, please contact HR@tangoe.com.

What special categories of data are used?

There are certain categories of personal data that are acknowledged as being particularly sensitive under most data protection laws. These tend to include data which reveals information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. In some countries financial information and unique government issued identifiers are recognized as having sensitivity.

These special data types are identified so that they can be given even greater protection.

In order to process your application and offer employment with Tangoe the following special categories of data are collected and used where required by law in applicable countries or in an anonymized format to evidence Tangoe's compliance with its diversity commitments. Providing this data is voluntary and will not impact your application:

- Gender
- Race/ ethnic origin
- In the USA, "physical or mental impairment or medical condition that substantially limits a major life activity"
- Needs to facilitate reasonable accommodations during the recruitment process, for example to ensure access and allow accommodations during a test or interview.

Where Tangoe processes special categories of personal data, such as information about gender, ethnic origin, protected veteran status and disability you may decline to respond without impacting your application. If you do respond this information is collected only for the purposes of equal opportunity reporting.

How does Tangoe ensure there is a lawful reason to use your data?

Most data protection law requires organizations to consider why and if they need to use individuals' data. It gives a limited list of "legal basis" which are acceptable reasons for organizations to use personal data. To manage your job application Tangoe will collect, use, destroy or retain your data where there is an identified legal basis. This privacy notice explains more about how these details vary depending upon the outcome of your application.

In some cases, Tangoe needs to use your data to ensure that it is complying with its legal obligations. This includes:

- Equal employment opportunity information to evidence compliance with anti-discrimination laws
- Right to work, work permit & visa processing
- "Voluntary Self-Identification of Disability" (USA)

Tangoe processes data in order to potentially enter into a contract of employment and/or execute a job offer with you.

In addition to this Tangoe processes certain data under the legal basis of legitimate interest, where these are not overridden by your data protection rights; which means it is something that we believe is reasonably required to run our business or manage the recruitment process, without being unfair to you. This includes;

- To verify information you have provided and, where applicable, conduct pre-employment background checks (varies per country)

- To protect our legitimate business interests and legal rights, including, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements; and/or
- To operate & keep a record of the applications and CV shortlisting process to evidence fair process in event of dispute

As a global operator Tangoe holds, uses and shares your data with colleagues in our various subsidiaries where this is necessary to complete the steps required prior to potentially enter into an employment contract with you, or where this is reasonably required for the running of the recruitment process.

Should Tangoe wish to use your personal data for any reason not required by law, contract or legitimate interests of the business, it will obtain your consent before doing so.

Who will Tangoe share your data with?



Tangoe understands how important confidentiality and appropriate use of your data is to a trustful working relationship. As such your data will only be shared where it is necessary to do so. For example, your data will only be made available to those individuals within Tangoe that have an active role in the recruitment process or the recruitment management process. Tangoe employees may see specific sections of your data where it is required which could include:

Role	Purpose (What do they do?)
Talent Management	For the management of the recruitment process and handover to the HR team upon successful application
Finance	For payment of third party recruitment fees and managing payroll where an application is successful
Senior leadership	Where individuals are involved as decision makers in the recruitment process, for management reporting and resource planning
Other managers & staff	For considering your application, management reporting and resource planning
IT Administrators	To manage the systems Tangoe uses to house your application data
Legal	To provide legal guidance and advice
Data protection & Security	For management of potential subject access requests or security incidents
Compliance Team	For audit purposes and compliance monitoring

In order to manage your job application, Tangoe may contract with third-party vendors and suppliers to perform certain functions on Tangoe's behalf or to enhance Tangoe's existing internal services (this may vary by your country of employment). Additionally, Tangoe may be obliged to disclose data for legal or regulatory purposes.

These third parties will have access to data only to the extent necessary to permit them to do their jobs, they are required to take appropriate security measures to protect data and are prohibited from using your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

This would include:

<ul style="list-style-type: none">•Background check provider (where applicable)•Applicant tracking system provider•DocuSign for contract signature management•Government departments, e.g. immigration authorities, national statistics office•Auditors•Accountants <p>Required Third Party Disclosure</p> 	<ul style="list-style-type: none">•Legal Counsel•Regulatory bodies•Software or system providers•Email, ticketing, survey or messaging with corporate platforms or mobile devices•Recruitment agencies•Data hosting centers <p>Likely Third Party Disclosure</p> 
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In event that Tangoe were to be sold or integrated with another business, your details may be disclosed to our advisers and would be passed to the new owners of the business.

Tangoe will not sell your data to a third party.

Where will your data be stored and used?

Tangoe is a global organization with a US parent and our central administration is held in the USA. For a full list of Tangoe’s locations please look here <https://www.tangoe.com/about-tangoe/locations/> .

The subcontractors, recruitment service providers and third-party organizations that Tangoe uses will vary dependent on which country you live in.

Tangoe uses HR and recruitment systems which are hosted in the USA. In most instances your data will be accessed by our employees and/or service providers in multiple countries, including some outside your country of residence which may have less protective data protection or privacy laws.

To safeguard EU data during international transfers, Tangoe ensures that data is disclosed:

- To countries the EU Commission has identified as having protective data protection laws (“adequate countries”)

- to third parties under protection of a data processing agreement which includes a contract designed to protect cross border transfers called Standard Contractual Clauses [SCCs]
- between its subsidiaries under protection of an intra-subsidiary contract that contains SCCs

If you would like to understand more about this, please contact us at dataprotection@tangoe.com.

How is your data used?

Tangoe has documented the main uses of your personal data, however if you have any questions or would like more detail please contact us at dataprotection@tangoe.com.

i. Recruitment Process

Process	How your data is used
Nationality & Right to Work	Check and monitoring of legal right to work in country of employment
Visa & Work Permits	Check and monitoring of legal right to work in country of employment
Pre-employment Background Checks	To assess and verify suitability to work and veracity of the information provided during the recruitment process. This varies by country and may include medical check for fitness to work, former employer reference(s) criminal checks, government identification number traces, criminal history, 10 panel drug screen, global sanctions & enforcement check, education verification, employment verifications, national sex offender registry check, credit reports, public domain search (France only in lieu of criminal check)
Employment Contract or Job Offer	To create your employment contract or job offer providing details of your terms and conditions of employment and get signatures in place
Employee Onboarding	Details such as name, address, date of birth, nationality, bank details, job title, salary, line manager, creation of employee id, etc. used to set employee up on HR system for the purposes of recording the details of employment
CV/ Resume Management	Tangoe will manually assess your skills and experience against the requirements of the role.
Interview Process	<p>If you are selected for an interview you will be contacted by a member of the Talent Acquisition team to arrange a phone call. If it is determined that your skills are a potential match for the position, then an interview will be arranged with the Hiring Manager. Your resume, relevant application data and salary information will be shared with the hiring manager and other members of the hiring team such as other members of human resources, the leadership team and other staff relevant for the interview process.</p> <p>Your data will be used for the distribution of required information to relevant Tangoe interviewers, records of interviews conducted and management of the interview process</p>
Job Offer Process	If you are made an offer of employment by Tangoe you will be called by a member of the Talent Acquisition team and made a verbal offer, which is then followed up with a written offer. If you are represented by a recruitment agency this offer and relevant information will be communicated by the agency.

	The formal offer will be uploaded into DocuSign and emailed to you for review and signature.
Appointment records	Recording successful candidates against opportunities

ii. Reporting & Monitoring

Process	How your data is used
Equal Opportunity	To provide data as required to the US government and to evidence compliance with internal equality policies
Diversity	To provide data as required to the US government and to evidence compliance with internal equality policies
Management Reporting	Used for things such as tracking status, organizational planning, workforce planning, financial performance, reporting of statistics
Workforce Planning	To plan for requirements of the business moving forward
Security	CCTV monitoring for security purposes at Tangoe offices

iii. Legal Compliance

Process	How your data is used
Employment Laws	As required for compliance with legislation, such as any required reporting or record keeping, as part of any processes with associated actions guided by law. For example: Applicant data in the US should be retained for 12 months in case it is required for EEOC. Chinese Labor Contract Law stipulates in Article 50 for hired applicants the employment contract is retained for 2 years after the employee's termination.
Country Specific Legislation	As required for compliance with legislation
External Audit	As required for compliance with legislation, such as tax authority audit

iv. IT & Business Management

Process	How your data is used
System ID & logs	To hold and manage recruitment information on Tangoe's third party recruitment software
Audit logs	Where applicable, use of Tangoe's websites are monitored and data collected to improve the user experience, to provide management information and for security purposes

If your application is successful, then your data will be used in different ways which are explained in detail within our Employee Privacy Notice.

If your application is not successful, this time, then Tangoe will contact you or the recruitment agency, as applicable, to share the outcome.

Is there any automated decision making?

Automated processing of data does take place, however no decisions are made that could have legal or other equally significant impact on an individual without human involvement and consideration taking place. For example resumes/CVs are manually reviewed.

Does any monitoring or profiling take place?

Tangoe does not use your data for profiling.

Tangoe will monitor the use of our premises, for security and compliance purposes. If you visit our offices as part of the recruitment process this may result in the collection of your image through CCTV cameras in and around our offices and your data during the visitor sign in process.

How long will Tangoe keep my data?

In most instances, your data will only be kept for as long as it is needed to manage your application for employment with Tangoe and to comply with any legal obligations. How long this is varies based on the type of data, its purpose, applicable Tangoe policies and the laws of the country you live in.

- Successful candidates' data will be retained for the duration of your employment plus any period thereafter required by applicable laws.
- Unsuccessful candidates' data shall be retained for 12 months after the role being closed to allow Tangoe to demonstrate that the recruitment process was conducted in a fair and transparent way, with no discrimination, in event of a legal claim.
- Unsuccessful candidates' data may be retained for up to 3 years, with explicit consent where required by local law, in case another role becomes available which might be of interest to you
- Tangoe is required to keep anonymized, aggregate information to evidence compliance with equality laws, however this is not linked to personal data and could not be traced back to any individual.
- If your data has been submitted through an internal Tangoe employee and you decline to be progressed, then the submittal will be removed from the Talent database.

After these periods, Tangoe will securely destroy your personal data in accordance with our data retention policy. If you would prefer Tangoe does not retain your data please contact us at dataprotection@tangoe.com.

What happens if I stop working for Tangoe?

We hope that you will have a long and happy employment with Tangoe, however if your employment should end for any reason the way Tangoe will process your personal data is explained in our Ex-Employee Privacy Policy.

How will Tangoe protect my data?

Tangoe takes the security of your data seriously. The organization has internal policies and appropriate security measures designed to prevent your data from being accidentally destroyed, lost, misused or disclosed. Your data is only accessed by Tangoe employees that have a need-to-know in order to perform their duties, and are subject to a duty of confidentiality.

Where the organization engages third parties to process personal data on its behalf, they do so on the basis of written instructions, also under a duty of confidentiality and are obliged to implement appropriate technical and organizational measures to ensure the security of data.

Tangoe has put in place procedures to deal with any suspected data security breach and will notify you, and any applicable regulator, of a data breach, where we are legally required to do so.

Will my data be used for direct marketing?

No. Tangoe will not use your personal data for direct marketing or sales purposes.

What are your rights?

Data protection legislation gives individuals rights. To find out more about your rights please read Tangoe's Rights Guidance.

Your responsibility as a candidate

You are responsible for the information you provide to us and that it is honest, truthful, accurate and not misleading in any way. If you provide information concerning any other person such as individuals you provide as references, you are responsible for providing any notices and ensuring your referee consents to Tangoe collecting and processing that information as described in this Privacy Statement.

Changes to this Privacy Notice?

Tangoe keep this Privacy Notice under regular review to make sure it is up to date and accurate, and so we may change this Privacy Notice from time to time. However, we will not reduce your rights under this Privacy Notice. Updated Privacy Notice's will be displayed on the Tangoe website, the version and last modified date in below tells you when it was last updated.

How to contact Tangoe?

Tangoe US, Inc. together with its' global affiliated companies ("Tangoe") is a leading global provider of Technology Expense Management (TEM) and Managed Mobility Services (MMS) solutions to a wide range of global enterprises. Tangoe helps companies work smarter to drive both bottom-line improvements and top-line growth. Our head office is 169 Lackawanna Avenue, Parsippany, NJ 07054, USA. You can find out more about Tangoe, what we do and our organization at www.tangoe.com .

If you have any questions or concerns Tangoe welcomes the opportunity to discuss and help resolve these. Our Data Protection Team can be contacted dataprotection@tangoe.com

or by post at: Data Protection at Tangoe, 10 Park Square, Milton Park, Abingdon, Oxfordshire, UK, OX14 4RR

In some countries, if you feel that Tangoe has not been able to resolve your data related concern you are entitled to make a complaint to a Supervisory Authority, such as the UK's Information Commissioner's Office.

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REVISION HISTORY

Version: 1.2

Last Modified Date: 30.06.20

Date	Page(s)	Section	Change Description	Initials
19.03.19	All	All	Rebranding update	SA
30.06.20	All	All	Full annual review and updates to notice	All Table 2 Owners

Table 1 – Record of changes

Stephanie Ahearn	Team Lead Talent Acquisition	Notice Owner	30.06.20
Laura Wilkie	Global Data Protection & Privacy	Data Protection Sponsor	30.06.20
Keri King	Global Compliance	Compliance Sponsor	30.06.20
Sandi VonDrateln	Chief Human Resources Officer	Executive Sponsor	30.06.20

Table 2 – Table of Owners