

PRIVACY NOTICE FOR JOB CANDIDATES

LAST UPDATED: APRIL 12, 2018

THIS NOTICE DOES NOT APPLY TO U.S. EMPLOYEES

INTRODUCTION

Your privacy is important to Expeditors.

We created this Privacy Notice (also referred to as “**Notice**”) in order to help you understand who we are, what Personal Data we collect about you, why we collect it, and what we do with it during our recruitment process. Keep in mind that “**Personal Data**” (also referred to as “**Data**” or “**your Data**”) means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, *e.g.*, first name and last name, email address, phone number, etc. Your Personal Data **does not** include anonymous or non-personal information, *i.e.*, data that cannot be associated with or tracked back to you.

We encourage you to take some time to read this Notice in full.

WHO IS EXPEDITORS?

When this Notice mentions “**we**,” “**us**,” or “**Expeditors**”, it refers to the controller of your Personal Data under this Notice, namely the Expeditors Affiliate which may be interested in offering you a position or that otherwise decides which of your Data are collected and how they are used, as well as Expeditors International of Washington, Inc. – 1015 3rd Ave, Seattle, WA 98104, USA (“**Expeditors Corporate**”).

WHAT TYPES OF PERSONAL DATA DO WE COLLECT ABOUT YOU?

Below you will find an overview of the categories of Data that we may process during your employment:

Categories of Personal Data	Examples of types of Personal Data We Collect
Personal identification data	First name, last name, title, gender, country, date and place of birth, nationality, language(s) spoken, marital/civil partnership status, domestic partners, dependents, photograph (subject to your consent), social insurance or security number, credit card number, passport number, driver’s license number
Contact information data	Email, phone, address, previous names or addresses, additional information you provided (<i>e.g.</i> , a cover letter), driver’s license number as required for certain positions
Network traffic data and other related data	Online identifiers, IP address, cookies, device ID, websites visited, language settings
Account login information	Login ID and username, password, other information used to access and/or secure Company systems and applications including a career website

Categories of Personal Data	Examples of types of Personal Data We Collect
Data regarding qualifications and career development	Any information contained in resumes (CVs) and additional documents containing personal details (e.g., diplomas, certificates) as provided by candidates, assessment and/or test evaluation information, evaluations of interviews conducted with candidates, educational and employment background, job qualifications, jobs for which the candidate would like to submit an application, willingness to relocate, driver's license information, any additional information such as transcripts, information relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records. employment references and related information, compensation requests
Information resulting from background or employment check and/or an employment reference	Feedback, opinions
Images and/or videos from which you may be identified	Images captured by CCTV or visitor recognition/authentication devices or pictures attached to your resume (CV) or otherwise provided to us by you
Special categories of Personal Data aka Sensitive Personal Data	<p>When permitted by local law:</p> <ul style="list-style-type: none"> ■ Information about nationality or citizenship, criminal history, or trade union membership ■ Information about disabilities to the extent relevant for the performance of your work: for instance, where we would be required to make work or workspace adaptations or adjustments ■ Racial or ethnic data: for instance where this would show from pictures, photographs and other visual images, but also where such data is processed for diversity related purposes
	<p>Note: We generally process these special categories of data in order to comply with legal obligations and internal policies, such as relating to diversity and anti-discrimination. Expeditors does not request or consider information concerning religion, sex life or political opinions in connection with recruiting.</p>
Criminal data	Data relating to criminal behavior, criminal records or proceedings regarding criminal or unlawful behavior (only in certain countries, for certain roles and only upon request of Expeditors)
Compensation and payroll	Bank account information (to support expenses of certain candidates), desired salary, compensation, and benefits
Any other information that you decide to voluntarily share with Expeditors	Feedback, opinions, information provided in emails and letters, during telephone calls and conversations

Please note that your election not to provide any of your Data as required or requested in the context of the recruitment procedure, may have effect on your ability to participate in the recruitment process.

Information we collect automatically

When you apply for a job offered by us, use our recruitment channels, or visit our career websites, in addition to the information you provide to us directly, we may collect information sent to us by your computer, mobile phone or other access device. For example, we may collect:

- Device information: such as your hardware model, IMEI number and other unique device identifiers, MAC address, IP address, operating system version, and settings of the device you use to access the Services;
- Log information: such as the time and duration of your use of our channel;
- Location information: for example, a location derived from your IP address or data that indicates where you are located, such as at a city or postal code level;
- Other information: about your use of our digital channels, such as the apps you use or the websites you visit.

For more information on how we use cookies and other tracking technologies, read Expeditors Cookie Notice at the [Expeditors Legal & Privacy](#) page.

Lastly, if you visit our premises, for security reasons we might also record your Data through video or other electronic, digital, or wireless surveillance system or device (e.g., CCTV).

Information we may collect from other sources

To the extent permitted by applicable law, in addition to our recruitment channels or career websites, we may also obtain information about you from other sources, such as through your interactions with Expeditors personnel or from third parties, such as recruiters or other websites on the Internet (subject to such third party's privacy notices), or from a background check report. For example, you may choose to provide us with access to certain data stored by third parties such as business and employment-oriented social media sites.

HOW DO WE USE YOUR PERSONAL DATA?

We may use your Data for the purposes of carrying out your application and the entire recruitment process. Below you will find an overview of the purposes for which we may process your Data during the recruitment process:

Purposes for processing Personal Data	Examples
Business operations execution and internal management	To identify and evaluate candidature, to assess skills, qualifications and interest against Expeditors career opportunities, to set up and conduct interviews and assessments, to evaluate, select and recruit candidates, to conduct background checks and assessments as required or permitted by applicable local law, to contact third party references provided by candidate to evaluate candidate's previous performances or as otherwise necessary in context of recruitment activities, to keep records related to Expeditors hiring process, to inform the Expeditors employee that referred the candidate for the job about the progress of the application, to make business travel arrangements, to manage expenses and reimbursements,
Job candidate support (upon your request)	To assist via talent acquisition teams and other communication channels

Purposes for processing Personal Data	Examples
Relationship management	To contact you by phone call, text (SMS), or email messaging, to inform candidates of available vacancies, to provide with information relating to application and to fulfill candidate's requests, to offer candidates suitable opportunities for employment within Expeditors
Security and protection of interests/assets of Expeditors or Expeditors employees	To deploy and maintain technical and organizational security measures, to conduct internal audits and investigations, to conduct assessments to verify conflict of interests
Compliance with legal obligations	To disclose Personal Data to government institutions or supervisory authorities as applicable in all countries in which Expeditors operates, such as tax and national insurance deductions; to comply with record-keeping and reporting obligations; to comply with government inspections and other requests from government or other public authorities; to respond to legal process such as subpoenas; to pursue legal rights and remedies; to manage any internal complaints or claims
Defense of legal claims	To establish, exercise or defend legal claims to which Expeditors is subject

ON WHAT LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

In order to process your Data, we may rely on different legal bases, including:

- Your consent (only when legally required or permitted);¹ or
- The necessity to establish and fulfill the employment contract we have with you. We will process your Data to enable us to run our business and manage our relationship with you effectively, lawfully and appropriately, while you are working for us, at the time when your employment ends and after you have left; or
- The necessity for us to comply with legal obligations and to establish, exercise, or defend our self from legal claims; or
- The necessity to pursue our legitimate interests, including;
 - Ensuring that our networks and information are secure;
 - Administering and generally conducting business within Expeditors and across Expeditors; and
 - Preventing or investigating suspected or actual violations of law, breaches of the terms of employment or non-compliance with Expeditors Code of Business Conduct; or
- The necessity to respond to your requests (such as responding to your requests regarding the handling of, access to, or changes to your Personal Data); or
- The necessity to protect the vital interests of any person; or
- Any other legal basis otherwise permitted by local laws.

¹ Generally, we are not required by privacy and data protection laws to get your consent to process your Data if our processing is for normal employment purposes.

Where we process special categories of Personal Data (a.k.a. Sensitive Personal Data) relating to your racial or ethnic origin, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless not required by law or the data is required to protect your health in an emergency. If you have a disability and would like Expeditors to consider an accommodation, you may provide that information during the recruiting process. To the extent you make Sensitive Personal Data available to Expeditors, you consent to Expeditors processing such data in accordance with this Notice. Where we are processing your Data based on your consent, you have the right (in certain circumstances) to withdraw that consent at any time, which will not affect the lawfulness of the processing before your consent was withdrawn. All communications in connection with withdrawing or varying the terms of your consent should be in **writing and addressed** to Expeditors Global Data Privacy Officer (you will find the contact details in the below section “What Are Your Choices?”

WHEN DO WE SHARE YOUR PERSONAL DATA?

To fulfill the purposes for which your Personal Data has been collected (for details on these purposes, see above section “How Do We Use Your Personal Data?”) we may disclose your Personal Data to the following parties:

Expeditors Affiliates. Due to our global nature, your Personal Data may be shared with certain Expeditors Affiliates. Access to Personal Data within Expeditors will be limited to those who have a need to know the information, for the purposes described in this Notice, and may include your interviewers, the relevant manager(s) of the respective job offer and other selected personnel within Expeditors. Expeditors takes appropriate steps to ensure that such personnel are bound to duties of confidentiality with respect to your Data.

Third party providers. Like many businesses, we may outsource certain Personal Data processing activities to trusted third party service providers to perform functions and provide services to us, such as:

- IS/IT service providers (e.g., software procurement/maintenance and data hosting)
- Consulting providers
- Background check providers

Public and Governmental Authorities. When required by law, or as necessary to protect our rights and properties, we may share your Personal Data to entities that regulate or have jurisdiction over Expeditors. In addition, your Data may be disclosed as part of Expeditors regular reporting activities, or where necessary to protect a person’s safety, where your Data is publicly available or with your consent where such consent is required by law.

Professional advisors and others. We may share your Personal Data with other parties including professional advisors, such as:

- Banks
- Insurance companies
- Auditors
- Lawyers
- Accountants
- Other outside professional advisors

WHEN DO WE TRANSFER YOUR PERSONAL DATA ABROAD?

Due to our global nature, the Personal Data you provide to us may be transferred to or accessed by Expeditors Affiliates and trusted third parties from many countries around the world. As a result, your Personal Data may be processed outside the country where you live if this is necessary for the fulfillment of the purposes described in this Notice.

If you are located in a country member of the European Economic Area, we may transfer your Personal Data to countries located outside of the European Economic Area. Some of these countries are recognized by the European Commission as providing an adequate level of protection. With regard to transfers from the European Economic Area to other countries that are not recognized by the European Commission as providing an adequate level of protection, we have put in place adequate measures to protect your Data

For intra-group data transfers, where required by applicable law, Expeditors and Expeditors Affiliates have entered into appropriate cross-border transfer solutions, which may include approved European Commission standard contractual clauses. For transfers to trusted third party providers, we will ensure that the relevant third party provider ensures an adequate level of data protection by means of contract or otherwise and enters into appropriate cross-border transfer solutions (*e.g.*, approved European Commission standard contractual clauses).

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your Data only for as long as is necessary to fulfill the purposes for which your Data was collected (for details on these purposes, see above section "How Do We Use Your Personal Data?") and we may retain and use your Data to consider you for other positions. The criteria used to determine our retention periods include:

- How long is the Personal Data needed to provide you with a job offer?
- Do you have an account with us? In this case we will keep the Data while your account is active or for as long as needed to provide services to you.
- Have you indicated that we can retain your Data to consider you for other positions?
- Are we subject to a legal, contractual, or similar obligation to retain the Personal Data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve Data relevant to an investigation, or Data that must be retained for the purposes of litigation.

If destroying or erasing your Data is not mandatory by law, we may make it anonymous such that it cannot be associated with or tracked back to you.

Of course, if you do not want to be considered for other positions or would like to have your Data removed, you can contact us at: expeditors.com/contact

HOW DO WE PROTECT YOUR DATA?

To protect your Data, we will take appropriate measures that are consistent with applicable privacy and data protection laws and regulations, including requiring our service providers to use appropriate measures to protect the confidentiality and security of your Personal Data. Depending on the state of the art, the costs of the implementation and the nature of the data to be protected, we put in place technical and organizational measures to prevent risks such as destruction, loss, alteration, unauthorized disclosure of, or access to your Data.

WHAT ARE YOUR CHOICES?

Access, Correction and Deletion:

- If you have any questions about this Notice or wish to (i) access, review, correct or request the deletion of your Data or learn more about who has access to such information, (ii) make any other type of request, or (iii) report a concern related to your Data, you should contact the employee relations manager or District Manager of the branch office to which you submitted your application. When requesting access to your Data, we may ask you for information so that we can confirm your identity and right to access, as well as to search for and provide you with your Data. We will do our best to address your request in time and free of charge, except where it would require a disproportionate effort. If you require assistance in preparing your request, please contact the employee relations manager or District Manager of the branch office to which you submitted your application.
- Your right to access Data that we hold about you is subject to limits. The law may allow or even require us to refuse to provide some or all of the Data that we hold about you. In addition, your Data may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you access to your Data, we will make an effort to explain the reasons why, subject to legal restrictions.
- We will remain responsible for complying with all such requests made by you in accordance with applicable local law even after the transfer of your Data as described in this Notice.

Automated Decisions:

We generally do not make promotion or other employment decisions based solely on automated decision-making within the meaning of the EU General Data Protection Regulation and other applicable privacy and data protection laws.² In the event automatic data processing is utilized to define your profile or assess your personality to aid in Expeditors' hiring or professional assessment, Expeditors will provide you an opportunity to express your views, for example, during a job interview and will provide any other safeguards required by law. You may request in writing, a copy of any results of tests taken by you during the recruiting or hiring process.

Inquiries, Complaints and Objections: You may submit inquiries, complaints and/or objections to the processing of your Data by sending a **request in writing** to:

Expeditors International of Washington, Inc.
Legal Department
1015 3rd Ave
Seattle, Washington State 98104
USA
Attn: Melissa Loh, Senior Counsel and Global Data Privacy Officer
By Email: dataprivacy@expeditors.com

WHEN WILL THERE BE UPDATES TO THIS PRIVACY NOTICE?

We may modify or update this Notice at any time in accordance with changes to legal requirements or internal information policies and practices. The most current version of this Notice will govern our use of your Personal Data.

Effective Date: April 12, 2018

Last Updated: February 5, 2018

² If applicable under the privacy and data protection law of your home country, you have a right to avoid being "subject to a decision based solely on automated processing, including profiling" or automated decision-making, which produce legal effects concerning you or similarly significantly affect you.