

LastPass Global Candidate Privacy Notice

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1. Who We Are and Scope Of This Privacy Notice

LastPass is an award-winning password manager and provider of password and identity management solutions that are convenient, easy to manage and effortless to use for individuals and businesses. This Global Candidate Privacy Notice (hereinafter "Notice") supplements our [LastPass Global Privacy Notice](#) and is designed to provide job applicants, leads, referrals, or candidates with important information about the types of personal data LastPass US LP and its affiliates ("LastPass," "we," "us," "our") collect from or about you and our practices for collecting, using, sharing, or processing of that data. LastPass US LP is based in the United States of America, with affiliates around the world. Depending on the role for which you apply and your location, one or more LastPass entities may be responsible for processing your Personal Data.

This Notice addresses data collected by LastPass to assess your qualifications for a particular position and facilitate your application for a job within LastPass. This Notice does not apply in situations where we process personal data on when you visit our webpage(s); visit our offices; register for or participate in our webinars, whitepapers, or contests; communicate with us; and download, access, or otherwise use our services. For more information relating to our privacy practices, please visit our [LastPass Global Privacy Notice](#).

2. What Personal Data Do We Collect

This Notice covers all personal data you submit to our LastPass Careers websites or during the job application process and potentially from other sources.

Data We Collect Directly From You

The categories of personal data that we collect directly from you:

- **Identifiers.** Such as name, contact information (e.g., phone number, email address, home address), for online recruiting system.
- **Professional and Employment-Related Information.** Personal data contained within CV/ resume or cover letter; previous work experience; professional and other work-related licenses, permits, and certifications held; awards and professional memberships; performance history; desired work requirements; references; work eligibility (if applicable), or other data disclosed by you in an interview.
- **Educational Information.** Educational details, qualifications, languages, and other skills.
- **Interview Information:** Audio recordings and transcripts of interviews, where applicable and permitted.
- **Feedback.** Where you elect to provide us with feedback, which may include, but is not limited to, reviews or suggestions posted online (e.g., in social channels or review sites), we may use any applicable personal data provided with the feedback to respond to you.
- **Special Categories of Data.** We would prefer that you avoid submitting the following sensitive data, except where such information is legally required: sexual orientation, race, ethnic origin, religion, beliefs, disability, marital status, creed, nationality, national origin, color, veteran status, or health status.

Any data you submit to us in support of your application must be true, complete, and not misleading. If you intend to provide us with details of a reference or any other third party as part of your application or submission, it is solely your responsibility to obtain consent from that third-party prior to passing such personal data to us.

Data Automatically Collected When Using Our Websites

- **Internet Activity.** Where applicable, if we are permitted to place cookies or similar technologies, we may also use your personal data for purposes that are consistent and compatible with the original purpose of collection under the same legal basis or where your consent has been given that is outlined in our [LastPass Global Privacy Notice](#).

Data We Collect From Other Sources

- **Professional and Employment-Related Information.** Background check data, which may include your criminal records history, employment history, educational history, or other information from third-party service providers as allowed by local laws; information about your performance or experience from references, other LastPass employees, or customers; and information provided by interviewers, if you are offered a job.
- **Other Third-Party Sources.** We may collect publicly available information from websites and social media, including information you voluntarily submit to us in connection with your application (e.g., applying through LinkedIn).

3. How We Use Your Data and Legal Basis

We only process your personal data to the extent required to carry out and complete the application process, for employment purposes, and consistent with applicable law. The legal basis of the processing is the necessity for the application process and, if applicable, the initiation of an employment relationship as well as our legitimate interest and, where applicable, your consent. We process your personal data to:

- Process your application;
- To support interviews and assess your capabilities and qualifications for a position;
- Verify your information through reference checks and background screenings (if you are offered a job and consistent with local law);

- Manage, operate, and improve the recruiting system and process, recruiting practices and activities, and database of interested individuals;
- Communicate with you about your interest in LastPass, employee experience at LastPass, job opportunities, or the recruiting process; and
- Comply with our obligations under any applicable law, rule, or governance.

As part of our recruitment process, we use an AI-powered tool to assist our recruitment team in reviewing applications. The tool analyses the content of your application, including your CV/resume, skills, experience and qualifications, and generates a match score reflecting how closely your profile aligns with the against the profile of the job you applied. The score is used only to support the recruitment team and is not the sole basis for any hiring decision. Hiring decisions are made by the recruitment team, who review your application. You may opt-out of AI-assisted tool through the process described in the job posting.

LastPass may anonymize or de-identify your personal data in order to minimize the amount of personal data processed and for purposes listed. LastPass maintains such data without attempting to re-identify it.

4. Who We Share Your Personal Data With

We may share your personal data for the following reasons:

- With our affiliated companies and subsidiaries within the LastPass company group in order to operate our business and fulfil the application process;
- With third-party service providers (such as Greenhouse Software, which is based in the United States of America, HireRight, which is based in the United States of America, for background checks and verification as part of the application process, and other IT and security service vendors, website hosting facilities, and email distribution services), contractors, and other third-parties we use to support our business. Such third-parties operate under appropriate confidentiality and data privacy obligations (only for the purposes identified in Section 3, “How We Use Your Data”);
- At your direction, with separate, specific notice to you, or with your consent;
- In connection with a merger, divestiture, acquisition, reorganization, restructuring, financing transaction, or sale of all or substantially all of the assets pertaining to a product or business line;
- To courts or authorities or other third-parties if we believe disclosure is lawful, necessary or appropriate to detect, investigate, prevent, or take action against illegal activities, fraud, or situations regarding the safety or rights of LastPass, our employees, you, or others;
- To courts or authorities or other third-parties in order to enforce our [Terms of Service](#) or other agreements we have with you; and
- As required by law or administrative order, which includes responding to relevant government or regulatory requests (Please refer to our [Law Enforcement Request Guidelines](#) for more information).

LastPass may share or disclose anonymized or de-identified data that does not identify an individual.

5. How Long Do We Process Your Personal Data

We determine the appropriate retention period based on the length of time we have an ongoing relationship with you and reasonable time after which we may have a legitimate need to reference your personal data to address issues which may arise, whether there is a legal obligation to retain such records, and whether retention is allowed by applicable law.

6. Cross Border Data Transfers

As a global organization, LastPass has international affiliates and subsidiaries, utilizes third-party service providers, and maintains a global infrastructure. Data that we collect and maintain will be transferred to and processed in the United States and other countries around the world.

7. Security

LastPass has implemented a comprehensive information security program which includes appropriate technical and organizational measures designed to safeguard and protect your data.

8. Children's Privacy

LastPass' webpages and recruiting processes are not intended for children. If you inform us or we otherwise become aware that we have unintentionally received personal data from a minor without a parent's or guardian's consent, we will delete this data from our records.

9. Your Rights

Depending on your jurisdiction, you may have certain rights regarding your personal data, including rights to access, correct, delete, restrict or object to certain processing activities and to exercise other rights available under applicable law.

Additional information for candidates in the EEA, UK and Switzerland is set out in Section 12.

Additional information for California residents is set out in Section 13.

LastPass will not discriminate against you, deny or provide you with a different quality of service, or charge you differently for exercising any of your privacy rights, as required by applicable law.

Exercising Your Rights

If you register on our career website(s), you may access, review, change, and delete some of the personal data collected about you by logging in to the career website and updating your account information. To exercise any of the above-mentioned rights, please submit your request to the LastPass [Individual Rights Management Portal](#), e-mail us at privacy@lastpass.com. For security purposes, we will need to verify your identity by matching the identifying information you provide with the personal data we already maintain. For additional information from the European Commission concerning data protection and your rights, see: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

If permitted by your jurisdiction, you may designate an authorized agent to make a request on your behalf. You must sign a written declaration that you authorized the authorized agent to act on your behalf and provide any information we reasonably request in our response in order to verify your identity. The authorized agent should submit such requests to the LastPass [Individual Rights Management Portal](#), or e-mail us at privacy@lastpass.com.

10. Changes

We may update this Notice from time to time to reflect changes to our personal data handling practices or respond to new legal requirements. If we make any material changes to this Notice that have a substantive and adverse impact on your privacy, we will provide notice on this website and additionally notify you by email (sent to the e-mail address specified in your account). We encourage you to periodically review this page for the latest information on our privacy practices.

11. Contacting LastPass

If you have any other questions about this Notice, you may contact the LastPass Privacy Team or Data Protection Officer by emailing us at privacy@lastpass.com or write to us via postal mail at: Attn: Data Protection Officer, c/o LastPass Legal, LastPass, 125 High Street, Suite 220, Boston, MA 02110 or LastPass Ireland Limited, Ella House, 41.2 Merrion Square, Dublin 2 D02 H2H2, Ireland.

If you have any difficulties reviewing the contents of this Notice, you may also contact privacy@lastpass.com if you wish to obtain a copy of this Notice in an alternative format.

12. European Economic Area, United Kingdom, and Switzerland Supplement

The following information supplements the above Notice and applies to individuals from the European Economic Area ("EEA"), the United Kingdom ("UK"), and Switzerland.

Data Controller

LastPass Ireland Limited (Ella House, 41.2 Merrion Square, Dublin 2 D02 H2H2, Ireland. Data protection officer: privacy@lastpass.com) is the controller for data collected in connection with recruitment activities if you live in the EEA or Switzerland or apply for a position located in the EEA. LastPass UK Ltd (2 North Park Road, Harrogate, HG1 5PA United Kingdom. Data Protection Officer: privacy@lastpass.com) is the controller for data collected in connection with recruitment activities if you live in the UK or apply for a position located in the UK. For purposes of conducting recruitment activities, LastPass Ireland Limited, LastPass UK Ltd, and LastPass US LP (contact information in Section 11) are responsible as joint controllers. The parties have jointly determined the means and purposes of processing.

For information on how to exercise your privacy rights, please refer to Section 9 of this Notice. For your convenience, your request will be handled centrally on behalf of the relevant controller.

Legal Basis For Processing Personal Data

We process personal data for the purposes described in Section 3 of this Notice, which also includes the lawful bases.

For individuals from the EEA, UK, and Switzerland, we keep your personal data up to six (6) months after you complete the application process based on our legitimate interest to assess your capabilities and qualifications for other positions and may retain it two (2) additional years if you consent.

Your Rights As An EU, UK, or Swiss Data Subject

As a data subject in the EEA, UK, or Switzerland, you have certain rights in relation to our processing of your personal data in accordance with applicable data protection regulations:

- Right to access (Art. 15 GDPR), right to rectification (Art. 16 GDPR), right to erasure (Art. 17 GDPR), right to restriction (Art. 18 GDPR), right to data portability (Art. 20 GDPR), right to withdraw previously given consent (Art. 7(3) GDPR).
- Right to object (Art. 21 GDPR). In certain circumstances (e.g., where the legal basis for processing is a legitimate interest or if we are performing direct marketing), you may object to continued processing for those purposes. If you do, we will re-evaluate our legitimate business interests and your data protection interests. We will only continue the processing activity if (i) there are compelling legitimate grounds for the processing that override your interests, rights and freedoms, or (ii) the processing is necessary to establish, enforce or defend legal claims.
- Right to lodge a complaint. We prefer to resolve any data protection concerns directly with you. However, you have the right to submit a complaint with a competent supervisory authority in the EEA, UK, or Switzerland where you reside, work, or suspect an infringement has occurred. You may find the contact details for the appropriate data protection authority here: <https://edpb.europa.eu/about-edpb/about-edpb/members>.

If you would like to exercise your rights as a data subject, please refer to Section 9 of this Notice or submit your request to the LastPass [Individual Rights Management Portal](#). For additional information from the European Commission concerning data protection and your rights, see: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

13. California Supplement

The following information applies to California residents. The California Consumer Privacy Act (as amended by the California Privacy Rights Act) ("CCPA") requires businesses to provide certain information regarding the collection, use and disclosure of personal information. This includes the categories of personal information that we disclose for "business purposes" to affiliates, service providers, partners, or other third parties detailed in Sections 3 and 4 of this Notice. We disclose the following categories of personal information:

- Identifiers.
- Professional and Employment-Related Information.
- Educational Information.
- Electronic, Visual and Audio Information.
- Sensitive Personal Information.
- Inferences drawn from the categories of information described above.

Your Rights as a California Resident

As a data subject California resident, in California you have certain rights in relation to our processing of your personal information in accordance with the Californian law. These include the right to know and access specific pieces of personal information that we process about you, right to request deletion of your personal information, right to request correction of your personal information, right to opt-out of sharing your personal information for advertising purposes, right to limit the use and disclosure of sensitive personal information, and right to non-discrimination for the exercise of your privacy rights.

If you would like to exercise your rights, please refer to Section 9 of this Notice or submit your request to the LastPass [Individual Rights Management Portal](#).

