

Wacom Recruiting and Hiring Privacy Statement

Wacom collects and processes your personal data when you express interest in or apply for employment with Wacom. The information below explains how Wacom obtains, uses, shares, and retains your personal data.

A full list of Wacom entities by country and their contact information appears at the bottom of this Privacy Statement.

What personal data does Wacom collect?

Wacom collects the following categories of personal data:

- **Application and Recruitment Information**
 - Data you provide to us during the application process;
 - Data about your credit history, criminal records or other data revealed during background screenings as permitted by applicable law;
 - Data generated by interviewers and recruiters, based on their interactions with you or information publicly available about you on the Internet;
 - Your offer letter or contract of employment and any amendments to it;
 - Data provided by third-party placement firms, recruiters, or job-search websites, where applicable;
 - Recommendations or references provided on your behalf by others; and
 - Data from third-party sites that you authorize to provide us information, such as LinkedIn or Indeed.
- **Core Applicant Information**
 - Your personal details, meaning your name, contact information, such as your postal or residential address, email address, and telephone number, your IP address, your emergency contact information, employment and educational history, other records of professional achievement (including your resume, CV, and other application materials), and biographical information;
 - Social Security number, driver's license, state identification card or passport number, signature, physical characteristics (*e.g.*, through a photograph, or video camera);
 - Correspondence Wacom sends or receives from you;
 - Information needed to reimburse you for expenses; and
 - Usage data regarding your usage of Wacom's information systems for purposes of data security, system performance monitoring, and system improvement.
- **Legal Compliance Information**
 - Information needed for monitoring our compliance with our equal opportunities obligations, such as race, national origin, sex, sexual orientation, age, and veteran status;

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- Documentation required under immigration laws, such as citizenship, and visa or permanent resident status;
- When permitted or required by applicable law, data about your health or disability where (1) it relates to your ability or availability to work or to a workplace accommodation; (2) is needed to comply with our legal obligations about the health and safety of the workplace; or (3) is needed to administer sick pay or other benefits; and
- Where permitted by applicable law, data about race, ethnicity, religion, disability, gender, sexual orientation, and other legally protected or significant characteristics or statuses, for purposes of government reporting where required, as well as to understand the diversity characteristics of the Wacom workforce;

You are not required to provide any requested information to Wacom, but failing to do so may affect our ability to consider you for employment or prevent us from considering you for employment.

You may read this Statement at any time by visiting <https://www.wacom.com/about-wacom/careers-at-wacom>

What will Wacom do with your personal data?

Wacom will use your personal data for the following purposes and on the following legal bases:

Purpose	Legal Basis
Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available.	To take steps at the applicant's request prior to entering into an employment contract and Wacom's legitimate interest of hiring appropriate employees.
Communicate with you.	To take steps at the applicant's request prior to entering into an employment contract and Wacom's legitimate interest of hiring appropriate employees.
Perform administrative functions relating to your candidacy (e.g. reimburse you for interview-related expenses).	To take steps at the applicant's request prior to entering into an employment contract, to comply with a legal obligation, and Wacom's legitimate interest of ensuring that it properly accounts for interview-related expenses.
Analyze our applicant pool to better understand who is applying to positions at Wacom and how to attract top talent.	Wacom's legitimate interest of ensuring continual improvement in its hiring and recruitment processes.

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Purpose	Legal Basis
Perform any legally-required reporting, and respond to legal process.	Compliance with a legal obligation.

Where the above table states that we rely on our legitimate interests for a given purpose, we consider how our use of your personal data could affect your interests, rights, and freedoms.

To the extent we collect special categories of personal data from applicants, our collection is necessary for carrying out our employment-related legal obligations.

Wacom will not use your personal data for purposes that are incompatible with the purposes listed in this Privacy Statement, unless it is required or authorized by law, you give consent, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

From what sources will Wacom obtain your personal data?

Wacom may obtain data about you from the following sources:

- From you;
- From previous employers;
- From service providers that we engage to work with you or us, such as third-party recruiters;
- From a job search or professional networking website (e.g. monster.com, LinkedIn, Indeed, etc.) where you may have made data about yourself publicly available;
- From third-party recruiters, staffing companies, or websites in situations where you are introduced to Wacom through one; and
- From background checks, where permitted by law. To obtain this personal data, Wacom may contract with a third party to perform a pre-employment background screening. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. You will receive more detailed information about the background check before it begins.

Who will have access to your personal data? Where are they located?

In general, access to your personal data will be restricted to minimize the number of people in Wacom's global organization who need it for the purposes set out in this Privacy Statement.

As a global organization with global information technology systems, your personal data may be transferred to other offices in Wacom's worldwide organization. Wacom has internal policies to ensure personal data are protected across Wacom's worldwide organization. Any transfers of your personal data from within the European Economic Area (EEA) to other Wacom entities outside the EEA will be governed by Wacom's Data Transfer Agreement-EU (which incorporates

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EU standard contractual clauses). A list of the Wacom entities that may process your personal data, and their contact information, can be found here at the bottom of this statement.

Furthermore, when Wacom shares your personal data with third parties, Wacom takes steps to protect your personal data. Any service providers to whom your personal data are disclosed are expected and required to protect the security of your personal data and may only use your personal data in compliance with applicable data protection laws. The following categories of third parties will have access to a subset of your personal data appropriate for their purposes or as prescribed by law:

- Authorized personnel at our service providers, including:
 - Information system service providers and
 - Background check service providers, where applicable. These companies may be based in another country, and may obtain data from other countries where you have lived, worked or studied, as may be relevant as part of a background check;
- Government officials where legal reporting requirements exist, or law enforcement agencies or private litigants in response to valid law enforcement process (warrant, subpoena, or court order); and
- A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Wacom business, assets or stock (including in connection with any bankruptcy or similar proceedings).

How long will Wacom retain my personal data?

When you are given and accept an offer of employment by Wacom, personal data collected during your pre-employment period becomes part of your Wacom personnel records and our practices regarding your data will be governed by the Wacom Employee Privacy Notice.

Otherwise, Wacom determines the retention period of your information based on the following retention criteria:

- Wacom retains your personal data as long as it has an ongoing relationship with you;
- Wacom retains your personal data where it is required to do so by a legal obligation to which it is subject; and
- Wacom retains your personal data where this is advisable to safeguard or improve Wacom's legal position (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

How Wacom protects your personal data

Wacom employs organizational, technical, and physical security measures in order to protect your data from loss or misuse. When we retain third parties to provide services to us that require them to have access your personal data, we require them by contract to have security controls in place that are comparable to our own security controls.

How to request access to your personal data or contact us with questions or feedback

If you have a question, comment, complaint, or wish to make a request relating to your personal data rights, you may contact us by email or by mailing to the address of the responsible entity listed below.

Subject to certain exceptions set forth in the applicable law, you have the right to:

- request access to your personal data: this right entitles you to request access to personal data we process about you, as well as to certain information on such processing;
- request rectification of your personal data: this right entitles you to request the rectification or completion of any of your personal data that you view as inaccurate, outdated, or incomplete;
- request erasure of your personal data: this right entitles you to request the erasure of your personal data, except data that we are legally required to maintain for a certain period of time, including where such personal data would no longer be necessary to achieve the purposes;
- object to the processing of your personal data: this right entitles you to request that we no longer process your personal data, except as required to maintain our employment relationship;
- request the restriction of the processing of your personal data: this right entitles you to request that we only process your personal data in limited circumstances, including with your consent; and
- request a copy or the portability of your personal data: this right entitles you to receive a copy of personal data that you have provided to us.

If, despite Wacom's commitment and efforts to protect your personal data, you believe your data protection rights have been violated, you have the right at all times to lodge a complaint with a supervisory authority, either in the country where you live, the country where you work or the country where you believe that data protection law has been infringed.

Additional Provisions required by Local Laws

[Japanese Law Disclosure - for applicants of Wacom Co., Ltd.](#)

In accordance with the "Act on the Protection of Personal Information" of Japan, certain items with regard to the way of processing personal data obtained by Wacom, including the purpose of use and the details of joint use, are disclosed at <https://www.wacom.com/ja-jp/privacy-public-notice>

[California Consumer Privacy Act \(CCPA\) Disclosure](#)

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In 2018, the state of California enacted the California Consumer Privacy Act, and amended it in 2020 under the California Privacy Rights Act (collectively, “CCPA”), which affords certain rights for California employment candidates. This section specifically addresses the rights of California employment candidates under the CCPA.

- *A. Collection Categories*

As explained above, and incorporated here, we collect a variety of categories of information, including sensitive personal information, in connection with providing employment, which includes:

- **Application and Recruitment Information**
 - Data you provide to us during the application process;
 - Data about your credit history, criminal records or other data revealed during background screenings as permitted by applicable law;
 - Data generated by interviewers and recruiters, based on their interactions with you or information publicly available about you on the Internet;
 - Your offer letter or contract of employment and any amendments to it;
 - Data provided by third-party placement firms, recruiters, or job-search websites, where applicable;
 - Recommendations or references provided on your behalf by others; and
 - Data from third-party sites that you authorize to provide us information, such as LinkedIn or Indeed.
- **Core Applicant Information**
 - Your personal details, meaning your name, contact information, such as your postal or residential address, email address, and telephone number, your IP address, your emergency contact information, employment and educational history, other records of professional achievement (including your resume, CV, and other application materials), and biographical information;
 - Social Security number, driver’s license, state identification card or passport number, signature, physical characteristics (*e.g.*, through a photograph, or video camera);
 - Correspondence Wacom sends or receives from you;
 - Information needed to reimburse you for expenses; and
 - Usage data regarding your usage of Wacom’s information systems for purposes of data security, system performance monitoring, and system improvement.
- **Legal Compliance Information**
 - Information needed for monitoring our compliance with our equal opportunities obligations, such as race, national origin, sex, age, and veteran status;
 - Documentation required under immigration laws, such as citizenship, and visa or permanent resident status;
 - When permitted or required by applicable law, data about your health or disability where (1) it relates to your ability or availability to work or to a workplace accommodation; (2) is needed to comply with our legal obligations

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- about the health and safety of the workplace; or (3) is needed to administer sick pay or other benefits; and
- Where permitted by applicable law, data about race, ethnicity, religion, disability, gender, sexual orientation, and other legally protected or significant characteristics or statuses, for purposes of government reporting where required, as well as to understand the diversity characteristics of the Wacom workforce;

- *B. Information Sources*

As explained above, we collect personal information from employment candidates themselves; their previous employers; from service providers that we engage to work with you or us, such as third-party recruiters; from a job search or professional networking website (e.g. monster.com, LinkedIn, Indeed, etc.) where you may have made data about yourself publicly available; from third-party recruiters, staffing companies, or websites in situations where you are introduced to Wacom through one; and from background checks, where permitted by law.

To obtain this personal data, Wacom may contract with a third party to perform a pre-employment background screening. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. You will receive more detailed information about the background check before it begins.

- *C. Personal Information Use and Sharing for Employment-candidacy and Application Purposes*

As explained in greater detail above, we use personal information collected for a wide variety of employment-placement purposes:

- To take steps at the applicant's request prior to entering into an employment contract,
- to facilitate Wacom's legitimate interest of ensuring that it properly accounts for interview-related expenses;
- to comply with a legal obligation;
- to improve our hiring and job-candidate processes.

We disclose and share your personal information only for the purposes described above to the following categories of third parties:

- Service providers, as explained above, and with Affiliates.
- *D. Sales of Personal Information*

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We do not engage in any selling or sharing of Wacom employment candidates' personal information.

- *F. Your California Rights and Choices*

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

i. Access to Specific Information.

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Consumer Rights, below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - o sales, identifying the personal information categories that each category of recipient purchased; and
 - o disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Under the CCPA, you also may request that we disclose certain information to you about our collection and use of your personal information beyond the past 12 months. Wacom, however, may decline to provide you that information if doing so would require a disproportionate effort on our part.

ii. Deletion and Correction Request Rights

You have the right to request that we delete or correct any of your personal information that we collected from you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Consumer Rights, below), we will delete (and direct our service providers to delete) or correct your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

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- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

iv. Exercising Consumer Rights

To exercise the rights described above, please submit a verifiable consumer request to us by one of the following methods:

- Emailing us at privacy-wtc@wacom.com;
- Calling us toll free at 1-855-669-2266; or
- Submitting a request through our webform accessible [here](#).

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

To verify the identity of an individual making a request, a two-step process will need to be completed. A verifiable consumer request must:

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- Separately provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

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We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

iv. Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Unless otherwise requested, any disclosures we provide will cover only the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

- *F. Non-Discrimination*

We will not discriminate against you for exercising your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. However, we do not currently provide any financial incentives.

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- *G. Shine the Light Disclosure*

We have not shared any personal information with other companies for their direct marketing use within the immediately preceding calendar year. Accordingly, California's "Shine the Light" law, Cal. Civil Code § 1798.83 to § 1798.84, does not apply to us and we have not established any mechanism for you to request information on our sharing of information for third parties' marketing purposes.

You are not required to provide any requested information to Wacom, but failing to do so may affect our ability to consider you for employment or prevent us from considering you for employment.

You may read this Statement at any time by visiting <https://www.wacom.com/about-wacom/careers-at-wacom>

Changes to this Privacy Statement

Wacom reserves the right to update or amend this Privacy Statement at any time. If we make a material change to this Privacy Statement, we will notify you by email or by means of a notice on our websites/intranet prior to the changes taking effect.

List of Wacom Entities and Contact Information

Wacom Co., Ltd.

privacy-wcl@wacom.com

Attention: Privacy Officer, Senior Director, Risk Management, Corporate Administration
Sumitomo Fudosan Shinjuku Grand Tower 31F, 8-17-1 Nishi-shinjuku, Shinjuku-ku,
Tokyo, 160-6131, Japan

Wacom Technology Corporation

privacy-wtc@wacom.com

Attention: Privacy

1455 NW Irving St Portland, OR 97209, USA

Wacom Europe GmbH

privacy-weg@wacom.com

z. Hd. Datenschutzbeauftragter

Völklinger Str. 1, 40219 Düsseldorf, Deutschland

You may also contact WEG's Data Protection Officer at dpo-weg@wacom.com.

Wacom China Corporation

privacy-wcc@wacom.com

Attention: Privacy

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518, West Wing Office, China World Trade Center, No. 1 Jianguomenwai Avenue,
Chaoyang District, Beijing 100004, China

Wacom Hong Kong Limited

privacy-whk@wacom.com

Attention: Privacy

Unit 1610, 16/F., Exchange Tower, 33 Wang Chiu Road, Kowloon Bay, Hong Kong

Wacom Korea Co., Ltd.

privacy-wkr@wacom.com

Attention: Privacy

Rm #1211, 12FL, KGIT Sangam Center, 402 Worldcup bukro, Mapo-gu, Seoul 03925, Korea

Wacom Taiwan Information Co., Ltd.

privacy-wtw@wacom.com

Attention: Privacy

9F-1, No.237 Songjiang Rd., Zhongshan Dist. Taipei 104 Taiwan

Wacom Singapore Pte. Ltd.

privacy-wsp@wacom.com

Attention: Privacy

#12-09 Suntec Tower Five, 5 Temasek Boulevard, Singapore 038985

Wacom India Pvt. Ltd.

privacy-win@wacom.com

Attention: Privacy

426, DLF Tower B, Jasola District Center, Mathura Road, New Delhi 110025, India

Wacom Australia Pty. Ltd.

privacy-wau@wacom.com

Attention: Privacy

Ground floor, Building 1, 3 Richardson Place, North Ryde, NSW, 2113 Australia