

## CVENT JOB CANDIDATE PRIVACY NOTICE

**Last Updated: October 23, 2019**

This Candidate Privacy Notice tells you how we process your personal data when you apply for a job via [www.cvent.com](http://www.cvent.com). Cvent, Inc. (US), administers the job candidates database, and Cvent Europe Ltd., Cvent Deutschland GmbH, Cvent Nederland BV, and Cvent España 2019 SLU will also use your data in cases when we have job openings in the UK or EEA ("**Cvent**", "**we**" or "**us**"). Cvent, Inc. (US) will also be involved in the decision-making process regarding your recruitment, if necessary.

This Notice applies to all candidate employees and applicants to Cvent. This Candidate Privacy Notice also describes your data protection rights, including the right to object to some of the processing Cvent carries out and where we rely on consent, the right to withdraw your consent. More information about your rights, and how to exercise them, is set out in the section titled, "Your Choices and Rights".

### **What Personal Data We Collect**

To the extent permitted by applicable law, we process the following types of personal data in connection with the recruitment process in which you are taking part:

- **Contact information:** your name, address, phone, email, and other similar information.
- **Information concerning your career:** information about your performance and career developments, your employment history.
- **Identification information:** your expatriate status, government identification numbers (e.g., National Insurance number), immigration status, nationality, and, where permitted, information concerning your race and ethnicity.
- **Any other information you submit to us (including during the course of any correspondence you may have with us):** answers to our questions in the application form, photographs (with your consent if it is needed according to the local law), details of interests and aspirations, opinions and any other information you provide.
- **Background check information:** your education, employment history, professional qualifications, membership in professional organisations, credit check information (such as bank accounts data, housing status, amount of monthly income, age and marital status, and provided that you apply for a position of a director or higher or any position in corporate finance and services industry), data related to criminal convictions and offences (if any), motor vehicle driving records, reference checks, civil suit records, and/or investigations into incidents involving theft, fraud, harassment and workplace violence (if any).<sup>1</sup>

On occasion, we may receive personal data from third party sources, such as if we receive details of a certification or training you obtained, when we obtain feedback or references concerning your performance, or if we receive a candidate referral from someone who recommends you for a position.

If the above information came from recruiters and not from you directly, recruiters should have informed you that they have applied on your behalf and informed you about how Cvent will process your data.

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<sup>1</sup> Certain portions of background check will only be performed if and to the extent required for the job description of the job you are applying.

Please do not include any sensitive data as part of your application, i.e. information relating to your racial or ethnic origin, political opinions, religious beliefs, trade union membership, health status or sexuality, or information regarding criminal convictions. If we do require this information in connection with your application, we will inform you separately and obtain any necessary consents or acknowledgements.

### **Why We Collect, Use and Store this Personal Data**

We collect, use and store your personal data for the reasons set out below.

- **Where necessary for Cvent's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights** (see Art. 6 para. 1 lit. f GDPR- General Data Protection Regulation):
  - Managing and administering the recruitment process you take part in to apply for a job offered via one of the Cvent sites or to keep you in mind for future roles.
  - Planning our recruitment business by administering and improving ongoing recruitment processes.
  - Protecting our legitimate business interests and legal rights. This includes, but is not limited to, 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.
  - Where we share your data with other members of the Cvent group and third parties where this is necessary for the recruiting process.
  - Where necessary and in accordance with applicable law, carry out background checks to verify the details you have supplied during the recruitment process (e.g. verify ID, i.e. name and address check or to search publicly available information/media searches (e.g. checking professional associations/memberships, relation to academic credentials or your employment history, bankruptcy/insolvency checks, county court judgments, newspapers, social media networks), and carry out pre-employment checks (for example an adverse financial check) in order to check your eligibility or suitability for a particular role. The level of required checks will vary by position and will usually be conducted at as late a stage as is practicable in the recruitment process and only after you have been selected for the position. Cvent is entitled to withdraw the offer of employment if background checks are not satisfactory.
- **Where necessary to establish the employment contract** (see Art. 6 para. 1 lit. b GDPR<sup>2</sup>):
  - Managing and administering the recruitment process you take part in to apply for a job offered via one of the Cvent sites.
  - Managing and administering your onboarding process after we have hired you.

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<sup>2</sup> For German candidates also Section 26 (1) German Federal Data Protection Act („BDSG“) apply

- **With your consent, which may be obtained at as late a stage as is practicable** (see Art. 6 para. 1 lit. a GDPR<sup>3</sup>):

We carry out background checks to verify the details you have supplied during the recruitment process (for example in relation to academic credentials or your employment history) and/or carry out pre-employment checks (for example, an adverse financial check) in order to check your eligibility or suitability for a particular role. If your application is successful, we will provide further information about the checks involved and we, or our background checking providers, will obtain any necessary consents or acknowledgements prior to completing such checks.

If your application was unsuccessful, we process your data if we want to consider you for vacancies other than the one for which you have applied (your consent is needed if you're either a German or Dutch applicant).

- **Where necessary to comply with a legal obligation** (see Art. 6 para. 1 lit. c GDPR):

To comply with applicable laws, such as verifying that you have the right to work in the country where your role is based or to analyse and monitor the diversity of the workforce in accordance with applicable laws. This includes for example, compliance with equal opportunity employment laws.

### **How We Share Your Personal Data**

We share some of your personal data with other members of the Cvent group where this is necessary to administer and manage group functions, including to administer ongoing recruitment processes, and the performance of Cvent group companies. If you want to find out more about Cvent group companies and their location please visit <http://www.cvent.com/en/company/>.

We disclose your personal information to our private equity sponsor, Vista Equity Partners, and its affiliates, including Vista Consulting Group (collectively, “**Vista**”), for administration, research, database development and business operation purposes, in line with the terms of this Privacy Notice. Vista processes your personal information on the basis of its legitimate interests in overseeing the recruitment process and, if applicable, your employment relationship with Cvent. If you have consented to us doing so, we also share your personal information with other Vista portfolio companies for the purpose of being considered for other job opportunities in the pooling system, both inside and outside the UK and EEA. Please find a full list of all Vista portfolio companies at: <https://www.vistaequitypartners.com/companies/>. Where this requires us to transfer your personal information outside of the EEA, please refer to Cvent’s Privacy Policy at <http://www.cvent.com/en/privacy-policy.shtml> for further details on cross-border transfers. In connection with the recruitment process, we transfer your personal data outside of the UK or EEA to Hirebridge, LLC and Criteria Corp., which provide applicant tracking services. Hirebridge, LLC and Criteria Corp. both comply with the EU-U.S. Privacy Shield Framework and ensure that your personal information is adequately protected whilst outside of the UK or EEA.

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<sup>3</sup> For *German candidates* also Section 26 (2) BDSG apply

Your personal data will also be shared with companies providing services under contract to the Cvent group, such as training providers, help desk providers, and IT hosting and/or IT maintenance providers.

Your personal data will also be shared with companies which Cvent uses as part of the recruitment process such as for background checks and assessment tests.

This aptitude test is part of the application process, but is not solely determinative of your outcome or success.

To the extent permissible by applicable local law, in the event that a Cvent business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's adviser, and will be passed to the new owners of the business.

### **Your Choices and Rights**

You have the right to ask:

- to receive confirmation of whether or not personal data concerning you are being processed, to access their content and obtain a copy (right of access in accordance with Art. 15 GDPR);
- to correct, erasure or restrict processing of your personal data (right of rectification in accordance with Art. 16 GDPR; right to erasure in accordance with Art. 17 GDPR; and right to restriction of processing in accordance with Art. 18 GDPR); and
- and to obtain the personal data you have provided to us in a structured, commonly used and machine-readable format and to request that the data are transmitted to another data controller where technically feasible (right to data portability in accordance to Art. 20 GDPR).

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement; right to object in accordance with Art. 21 GDPR).

Where we have asked for your consent, you may withdraw consent at any time (right to withdraw consent in accordance with Art. 7 para. 3 GDPR). If you ask to withdraw your consent to Cvent processing your data, this will not affect any processing which has already taken place at that time.

Furthermore, you have the right of not being subject to a decision based solely on automated decision-making in accordance with Art. 22 GDPR.

These rights may be limited, for example, if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. Also, Sections 32-37 of the BDSG may limit your rights if we process your data, they only apply if you are a German applicant.

If you have unresolved concerns, you have the right to complain to a data protection authority either in the place where you live, or work, or where the alleged infringement of GDPR occurred in accordance to Art. 77 GDPR.

## **How Long We Store Your Personal Data**

We will retain your personal data only for as long as we need it for recruitment processes, but the exact time may vary depending on the applicable provision of law. However, it will never be held longer than when you object to some of the processing which Cvent carries out and where you withdraw your consent.

	Unsuccessful application <sup>4</sup>	Successful application <sup>5</sup>	Future job openings
Cvent, Inc.	2 years	2 years	2 years
Cvent Europe Ltd., UK	3-9 months	Duration of employment contract + 6 years <sup>6</sup>	2 years
Cvent Deutschland	6 months form date of recruitment decision	Duration of employment contract	2 years, provided consent has been given
Cvent Nederland B.V.	Maximum of 4 weeks after the end of the application procedure	Duration of employment contract + 2 years, unless there is a legal obligation to keep your data longer	With consent: 1 year
Cvent España 2019 SLU	1 year; up to 5 years with consent	Duration of employment contract + 5 years	With consent: 5 years

## **International Transfers**

Your personal data will be processed in or accessed from jurisdictions outside the European Economic Area ("EEA") by members of the Cvent group in jurisdictions that do not have equivalent data protection laws to those in the EEA for the purposes outlined above. We will also transfer your personal data for these purposes to suppliers outside the EEA.

When we transfer your data within the Cvent group, we make use of standard contractual data protection clauses, which have been approved by the European Commission. When we transfer your data to organisations outside the Cvent group we may use these clauses. We may also transfer your data to organisations in the US who participate in the EU-US Privacy Shield, or which have binding corporate rules in place to protect your data, which have been approved by EU data protection authorities. For further information, including how to obtain a copy of the documents used to protect your information, please contact us as described in the Contact Us section below.

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<sup>4</sup> Records collected during the recruitment process may be retained for longer if a complaint is made about process/decision

Records collected during the recruitment process may be retained for longer if a complaint is made about process/decision

<sup>6</sup> Except for verification/criminal record information obtained by a vetting exercise, which would be destroyed as soon as possible or in any case within 6 months. However, we will retain a record that a search has been obtained. Any criminal records information should be deleted as soon as it has been verified through a DBS disclosure, unless in exceptional circumstances the information is relevant to the ongoing employment relationship.

## **EU-U.S. and Swiss-U.S. Privacy Shield**

We have certified adherence to the EU-U.S. and Swiss-U.S. Privacy Shield Principles for all personal data received from European Economic Area (EEA) member countries, the United Kingdom (UK), and Switzerland and are committed to complying with the Privacy Shield Principles, including the onward transfer liability provisions. To learn more about the Privacy Shield Framework, visit the [U.S. Department of Commerce's Privacy Shield List](#)

We are subject to the regulatory enforcement powers of the U.S. Federal Trade Commission with respect to personal data received or transferred pursuant to the Privacy Shield Framework. In certain situations, we may be required to disclose personal data in response to lawful requests by such public authorities, including to meet national security or law enforcement requirements.

We encourage interested persons to raise any concerns using the contact information provided below and will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data in accordance with the Principles.

*EU residents.* For EU residents, we have agreed to cooperate with the European Data Protection Authorities [[http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)] for the purpose of handling any unresolved complaints regarding Personal Data concerns. EU Data Subjects (applicants) may engage their local Data Protection and/or Labor Authority concerning adherence to the Principles, and Cvent shall respond directly to such authorities with regard to investigations and resolution of complaints.

*Swiss residents.* For Swiss residents we have agreed to cooperate with the Swiss Federal Data Protection and Information Commissioner (FDPIC) [<https://www.edoeb.admin.ch/org/00146/00147/index.html?lang=en>]. Swiss Data Subjects (employees) may engage the FDPIC concerning adherence to the Principles and Cvent shall respond directly to such authorities with regard to investigations and resolution of complaints.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

## **Updates to this Privacy Notice**

This Privacy Notice may be updated periodically. We will update the date at the top of this Privacy Notice accordingly and encourage you to check for changes to this Privacy Notice, which will be available at <https://www.cvent.com/en/careers>. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Privacy Notice, as required by applicable law.

## **Contact Us**

If you have questions about this Candidate Privacy Notice or wish to contact us for any reason in relation to our personal data processing, please contact us at [hrhelp@cvent.com](mailto:hrhelp@cvent.com) or contact our data protection officer at [dpo@cvent.com](mailto:dpo@cvent.com).

If you would like further information about your data protection rights, please contact your hiring Cvent entity. The data controller for your personal data will be Cvent, Inc. (US).

<b>Cvent Company</b>	<b>Address</b>
Cvent, Inc.	1765 Greensboro Station Place, Suite 700, Tysons Corner, VA 22102, U.S.A.
Cvent Europe Ltd.	40 Eastbourne Terrace, London, W2 6LG United Kingdom
Cvent Deutschland	Bockenheimer Landstraße 17/19 60325 Frankfurt
Cvent Nederland BV	Keizersgracht 555, 1017 DR Amsterdam, Netherlands
Cvent España 2019 SLU	C/Rossellón, 186, 3 <sup>o</sup> -5 <sup>a</sup> , 08008 - Barcelona, Spain

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