

Privacy and Cookie Policy

Last updated: January 2023

Cimpress plc and its subsidiaries (such as the Vista companies) respect and protect the privacy of the users of our global career site and portal (the “Career Site and Portal”). This Career Site Privacy and Cookie Policy (“Privacy Policy”) explains what information we collect during our recruitment process and why we collect it, how we use that information and how to access and update that information.

1. Applicability

This Privacy Policy applies to every visit of our Career Site and Portal, use of our recruitment services and all personal data of job applicants processed by Cimpress plc or its subsidiaries (hereinafter: “Hiring Entity”, “we”, “our” or “us”) in connection with our recruitment process.

By visiting, accessing and using our Career Site or Portal, you agree with and consent to the collection and use of the information as described in this Privacy Policy, including the transfer of your information and personal data to the various countries where our Hiring Entities offer career opportunities. We may also be required in some countries to share certain information anonymously to meet government compliance requirements.

2. Data Controller and Data Protection Officer

The data controller responsible for the collection and further processing of your applicant information is the Hiring Entity.

The company Cimpress plc having its statutory and office address at Building D, Xerox Technology Park, Dundalk, Co. Louth, Ireland, is responsible for operating the Career Site and Portal.

If you have questions regarding our Career Site and Portal, your privacy, the following information or if you would like to contact our data protection officer, please send us an email at dataprotection@vista.com.

3. Information that we collect

This section of our Privacy Policy describes the categories of information collected by us, whether collected automatically, provided voluntarily by you or through our recruiters or other third parties:

Information Provided by You through our Career Site and Portal:

- Email address (or alternative username) and password.
- First and last name.
- Telephone number.
- Location.
- Information provided by uploading your resume/CV and/or cover letter which can include your name, telephone number, email address, physical address, photo, linguistic skills, LinkedIn profile (or other Social Media details) and more information about your experience including previous employment information (e.g. date of hire, job title, team, work location etc.), education, job related skills & competencies and areas of interest.

- Any sensitive and/or demographic information obtained in accordance with applicable law during the application or recruitment process such as gender, disability, Veteran status, information about your citizenship and/or nationality and/or right to work or reside in a specific country, medical or health information (to confirm you're fit to work) and/or your racial or ethnic origin.
- ID and/or Passport and Social Security Number as well as visa or work permit details when you are successful in your application, which will be processed in connection with your employment relationship with the Hiring Entity. Details of the type of employment you are or may be looking for, your notice period in relation to your current employment, current and/or desired salary and other terms relating to compensation and benefits packages, willingness to relocate or travel, and/or other job preferences.
- Pre-employment screening information, where applicable and in compliance with applicable laws, such as background checks.
- Any other information that may be necessary in connection with your application and/or that you provide to us in support of an application and the recruitment process, such as references.

Information collected through our Recruiters, Employees or Third Parties:

- Information processed in relation to face-to-face interviews, video-calls and/or phone-screenings you may have with us.
- Assessment results where applicable (e.g. a code challenge).
- Job interview notes.
- Information from references.
- Information collected by third parties such as recruitment agencies that will include personal data as listed hereabove.
- Information from your Social Media accounts provided or imported by you as resume-information or accessible online, such as a LinkedIn and/or Facebook profile.

Information Collected Automatically:

- Your IP-address.
- The internet browser and device you use to visit and make use of the Career Site and Portal.
- The date and time you visit, and how you use our Career Site and Portal and access its content.

4. How we use your information

Your information can be used for the following purposes:

- Provide you with the recruitment services through our Career Site and Portal.
- Verify your eligibility or match you with the selection criteria as laid down in the job description. This also includes carrying out reference checks and/or conducting pre-employment screening (where applicable) as permitted by applicable law.
- Assess your application and skills, qualifications, interests and suitability against our open positions.
- Communications with you about the recruitment process and/or your application(s).
- Due to the global spread of our business, your job application data is made available to all our recruiters worldwide by entering this information into an international database. We also store

information regarding your job application history and any other communication you may have with the involved recruiting department of the Hiring Entity.

- The administration of the recruitment process and if your application is selected, further scheduling and organizing of interviews. As part of the interviewing process your information may be accessible worldwide to employees with a manager-role in the event the open job is part of a team that is operating globally.
- Assist you with obtaining an immigration visa or work permit and/or assist you with relocation where required.
- In the event the recruitment process leads to you and the Hiring Entity entering into an employment relationship, the electronic file with your job applicant data will be used to conclude an offer letter and/or contract with you and further processed as 'employee data', subject to the Employee Privacy Policy.
- Send you job notifications regarding new opportunities only when you have given us your explicit consent. You can opt-out or update the frequency on receiving job alert emails by following the steps explained below in Section 9.
- Perform statistical data analysis and user research in order to improve our application and/or recruitment process.
- In the event of a legal proceeding, to protect or defend us against a legal claim.
- When required by law and/or government authorities.

5. Legal Basis

The legal bases for processing your information including your "personal data" (i.e. any information about an individual from which that person can be identified) are:

- a) **Consent:** we obtain your explicit consent prior to creating your Account, storing and processing your job applicant data, including sensitive data such as your passport copy, visa and work permit details or social security number.
- b) **Fulfillment of contract:** where it is necessary to process job application data submitted by you and to assist in our determination as to whether to enter into a contract of employment (or engagement) with you.
- c) **Legitimate interest:** in order to improve or modify our application process or recruitment processes and to prevent fraud and maintain security.
- d) **Comply with legal obligation:** in some cases, we may be legally required to process data about you or use your data to help us establish or defend against legal claims.

6. Data sharing and international data transfers

Sharing within the Cimpress plc group

As part of the Cimpress plc group of companies and due to the global spread of our business, we might share your job application data internally among other companies in the group when necessary for processing your application, such as sharing with recruiting and HR departments of other Hiring Entities.

Sharing with third-party service providers

Where necessary, we may share the job application data we collect about you with other third parties who:

- Provide us with the software and cloud services in support of the Career Site and Portal and all its recruitment services, including the email delivery service that manages the job application updates. We use the cloud-based Blueprint-platform from the service provider SuccessFactors, Inc., part of SAP, Inc.;
- Provide hosting and maintenance support for the Career Site and Portal as well as the local technical and IT support for the involved databases, systems etc. (namely the involved providers SuccessFactors, Inc. and SAP, Inc.) and limited members of the IT department of the involved Hiring Entity;
- Assist in the recruitment and/or placement process, such as recruitment agencies;
- As a service provider to a local Hiring Entity, provide us with employee health and benefit services, e.g. benefit providers or insurance companies;
- Advise the Hiring Entity during the recruitment process, e.g. legal counsels, tax consultants or other type of advisors.

Like our recruiters or other employees involved with the recruitment process who may have access to your job application data, these third parties are bound to keep all such information confidential and to use it only as provided in their contracts with us.

Sharing for legal reasons

We might also need to share your job application data when required to do so by law in a subpoena or other legal proceedings, or if we believe, in good faith, that disclosure is necessary to:

- Investigate, prevent or act against suspected illegal activities, such as fraud;
- Respond to government authorities' requests and/or assist law enforcement;
- Enforce any agreement we might have with you;
- Investigate and defend ourselves against claims or allegations by third parties;

International data transfers

The job application data we collect about you, as described in this Privacy Policy, may be accessed, processed, stored in or transferred to countries that may not have the same data protection laws as the country in which you reside, such as the United States of America. We assess the circumstances involving all cross-border data transfers and have suitable safeguards in place to require that your personal data will remain protected in accordance with this Privacy Policy. For example, Cimpress plc group of companies or third-party service providers may be located outside of the EEA, the United Kingdom or Switzerland. In case your personal data is transferred to countries outside these regions, we make sure there is an adequacy decision from the European Commission with regards to the recipient country or that the transfer shall be conducted under an approved transfer mechanism, such as through the use of standard contractual clauses approved by the European Commission for such transfer of your personal data and impose specific technical and organizational security measures.

Transfers within the Cimpress plc group of companies are covered by an agreement entered into by the subsidiaries of the Cimpress plc group of companies (an intra-group agreement) which

contractually obliges each member to ensure that personal data receives an adequate and consistent level of protection wherever it is transferred within the Cimpress plc group of companies.

7. Security

We are committed to taking the necessary technical and organisational measures to protect your personal data against loss and unauthorised use, access and disclosure. These measures include but are not limited to encryption methods, access control, controlled administration of user rights and by limiting the access to the personal data to those persons, partners, affiliates and any other third parties who have a business need for such access in connection with the Hiring Entity as described herein and adhere to this Policy. We also refer to the Privacy Policy of the third-party providers - SuccessFactors, Inc. and SAP, Inc. - of the Blueprint-platform and cloud services behind our Career Site and Portal.

8. Retention

When your job application is successful, the Hiring Entity will further process the electronic file with your job applicant data as “employee data”, subject to the terms of your employment agreement and the Employee Privacy Policy.

The Hiring Entity will retain your personal data for the following retention periods:

- If you, or a recruiter on your behalf, create an account in the Career Portal, your account information will be retained for as long as your account is actively maintained. You can delete your “Candidate Profile” and the information contained therein at any time as explained below under Section 9. We will consider your account to be inactive after a continuous period of 2 years without login. Once your account has been declared inactive, we will proceed to its deletion without notice.
- Regarding the job application data we might hold of you as part of your “Candidate Profile”, we will retain it as long as your application status is active for a job requisition and for a period of 1 year after our recruiter informs you that you have not been selected as a suitable candidate. After such period, your job application data will be fully anonymized. The anonymization of your job application data will not affect your Candidate Profile, which will remain intact as long as you actively use it.

Please note, however, that we may retain some information for a longer period if required by law or as necessary to protect ourselves from legal claims.

9. Your data subject rights and how to exercise them

Subject to the applicable law and dependent on certain conditions, you may have the following data subject rights:

- Access your personal data including your uploaded resume/CV and/or cover letter and submitted applications by clicking on “View Profile”. Your data, job applications and uploaded documents are accessible by looking under “My Documents”, “Profile Information” and “Jobs Applied”;
- Request a copy of the personal data that you provided to us, to be transmitted in a workable format, by addressing such a request to the involved Hiring Entity or in writing by sending

an email to dataprotection@vista.com or a letter to Vistaprint B.V., Hudsonweg 8, 5928 LW Venlo, the Netherlands (attn. Recruiting Department);

- Correct, update inaccurate or incomplete personal data or delete any details of your Candidate Profile by placing the cursor in the form input field;
- Delete and/or replace an uploaded resume or CV by going to “My Documents”. Look for the uploaded document and then click on the “bin” symbol and upload a new resume or CV;
- Withdraw and/or remove an (ongoing) application by going to “Jobs Applied”. Look for the involved job application and click on the “Withdraw Application” button on the right side. The status of the application will be updated to “*Withdrawn by Candidate*”;
- Opt-out of the sale or sharing of the personal data you have provided to us.
- Close your candidate account and have your personal data that we hold herein deleted by going to “Settings” to click on the “Delete Profile” button;
- Withdraw any specific consents you gave us to use certain items of your personal data by going to your “Candidate Profile” to click on “Search Options and Privacy”. If you click on “Data Privacy Statement”, a pop-up will open that allows you to revoke your consent. After you have revoked your consent, your account together with all its content will be closed and deleted;
- Opt-out or update the frequency on job alerts or any other notifications by email about new opportunities by going to “Job Alerts” directly (or via your “Candidate Profile”) and unticking the checkbox next to the “Hear more about career opportunities” sentence or using the opt-out link in the email to unsubscribe.
- Lodge a complaint with a local supervisory authority.

If you need assistance besides using the functionalities in your account to exercise any of the rights listed above, you can contact your Hiring Entity by visiting its local country-site and use any of the details under the link “Contact Us” or send a letter to the address Vistaprint B.V., Hudsonweg 8, 5928 LW Venlo, the Netherlands (attn. Recruiting Department). If you wish to contact our data protection officer, please send us an email at dataprotection@vista.com.

For the protection of your privacy and personal data, we may need to verify your identity before responding to your request.

10. What are cookies and why do we use them on our Career Site and Portal?

Cookies are small data files which often include a unique identifier that are stored via your browser on your device when you visit certain web pages. Cookies are useful because they allow a website to recognize a user's device. Like most websites, our Career Site and Portal uses cookies that, among other things, let you navigate between pages efficiently, remember your preferences, and generally improve your experience.

The use of our Career Site and Portal is generally possible without cookies that do not serve a technical purpose. This means that you can configure your browser to prevent traceability via cookies, that is, refuse that any third-party cookies are stored on your device as further explained in the below sections.

11. What kinds of cookies do we use on our Career Site and Portal?

Our Career Site and Portal uses the following types of cookies:

Necessary cookies

These cookies allow us to provide you with a user-friendly Career Site and Portal and are essential to enable you to use its features, such as the creation of your Candidate Profile, to sign you in and to manage the jobs you've applied for through the Career Site and Portal. These technical cookies are absolutely necessary for our Career Site and Portal to function properly.

Functional cookies

These cookies allow our Career Site and Portal to remember choices you make (such as the language or the region you are in, your previously viewed available jobs), analyze your site usage and help you to use our Career Site and Portal efficiently and effectively. These cookies can assist to remember your account login so that you don't have to retype this every time you visit our Career Site and Portal. Note, that passwords, will always be encrypted.

Third-party cookies & how we link to Social Networks

On the Career Site and Portal you may notice the Social Media sites' pictograms of Facebook, Twitter, LinkedIn and YouTube or their sharing widgets and buttons. The pictograms will lead you to our company-page on these Social Networks through which we update you, not only about our latest job opportunities, but also, using pictures, images, photos and videos, about our company, the products and services we offer to our customers, examples of products that our customers create by using our services, and any other relevant news that we wish to share. If you click on these pictograms, you activate the connection to the chosen Social Media network and through the placement of their third-party cookies, your data will be collected and processed by the involved Social Media provider.

The same applies if you use the sharing widgets or "like"-buttons that are visible on our Career Site and Portal. When you click on such a "sharing"-widget or "like"-button, a plug-in of these Social Networks will be activated, and your browser will establish a direct link with the servers of the involved Social Media network. It is possible, when you are signed in to such a Social Media account, that information concerning your visit to our Career Site and Portal, will be passed on to the Social Media provider and to your user account.

We have no access to or control over cookies used by these Social Media networks or similar type of third-party websites, nor how Social Media providers use and transfer your information within their own network. If you wish to learn more about how they collect, process and use your personal data, through the use of their third-party cookies, we suggest you visit their main page (e.g. www.facebook.com) and read their privacy policy.

Facebook: we use "Facebook Insights" to understand more about how visitors of our Facebook-page, use and view this Facebook-page, including the reach of our posts, how often our videos are watched and from which countries and cities our visitors come from, as well as the statistics on the gender of our visitors. We do not have access to your individual Facebook-profile. With regard to the processing of Insights-data, there is a shared responsibility between Facebook and us. More details about this joint controllership can be found in the Joint Controller Addendum, accessible [here](#).

LinkedIn: you can when creating your candidate account, choose to import a profile of your personal and professional information from LinkedIn, in which case the information contained in your LinkedIn profile (such as your current job role and employer) will be provided to us by LinkedIn and used to populate your candidate profile and/or CV. If you import data from your LinkedIn-account, LinkedIn will place a third-party cookie on your device. For more information about these cookies and how your information is shared, we suggest you visit LinkedIn's website and privacy policy.

12. How can you manage which cookies are placed on your device?

Cookies allow you to take advantage of some of our Career Site and Portal's essential features and we recommend you leave them turned on. Please be aware that if you disable or delete certain cookies, our Career Site and Portal may not work properly.

The Help-menu on the menu bar of most browsers will tell you how to enable or prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer.

If you'd like to opt out of cookies created by using a "share" functionality through Social Media networks – such as Facebook and Twitter – we suggest you check those third-party websites for more information about their cookies and how to manage them.

13. Amendments and questions

Our Privacy Policy may be amended from time to time as required by applicable law, and to reflect changes to our collection, usage and storage practices. We shall publish each updated version on this page, so please review it frequently. In case of material changes, we will also provide notice to you and, where required by applicable law, we will obtain your consent. Your continued use of the Career Site and Portal will be deemed acceptance thereof.

If you have any questions about your job application data, this Career Site and Portal or our recruitment process, you can always contact your Hiring Entity by visiting its local country-site and use any of the details under the link 'Contact Us' or send a letter to the address Vistaprint B.V., Hudsonweg 8, 5928 LW Venlo, the Netherlands (attn. Recruiting department). If you wish to contact our data protection officer, please send us an email at dataprotection@vista.com. You can also lodge a complaint with the Data Protection Authority of your country.