

## **DuckDuckGo Recruiting Privacy Policy**

### **1. Scope.**

DuckDuckGo will process personal information to consider you for a position with us, and if you are successful, to offer you a position.

If you are applying for a position as an employee, the DuckDuckGo entity that will employ you and Duck Duck Go, Inc. are each a controller of the personal information that is processed under this policy. Duck Duck Go Inc. is the sole controller if you are applying for a contractor position. The DuckDuckGo entities acting as controllers in these circumstances are listed at the end of this Policy.

In this policy (the "Policy") Duck Duck Go, Inc. and its subsidiaries are referred to as "DuckDuckGo," "we," "us," or "our".

### **2. Information About You We Collect, and Use, and Why.**

Some of the information requested on the job application form is necessary so that we can assess your application. We may not be able to consider you for the position if you choose not to provide some of this information or, where we require your consent for the processing and you choose to withdraw your consent.

Most of the information we have, or will have, is provided by you, but some information may come from external sources, such as references, a recruitment service provider, or background checks (if applicable to the position for which you are applying and allowed by local law).

We may use artificial intelligence-enabled technologies and third-party services to assist with our recruitment processes, such as prioritizing applicants for review and summarizing key takeaways from assessments. However, you will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

A. The personal information that we will collect, use, and disclose (collectively, "process") when you apply for a position may include your name, contact details, government issued identification number, social security/insurance number, demographic data, including gender, race and ethnicity, professional and educational background (including credentials), including any information you include in your application, CV, or cover letter, immigration and work permit status and any other information you provide as part of the recruitment process.

**Purpose and Legal Grounds:** We process this personal information to pursue our legitimate interests including assessing and selecting the most suitable candidates. Additionally, we may process your information to enter into a contract with you, to determine benefits eligibility, and to comply with equal opportunity and non-discrimination programs where required or permitted under applicable laws. Finally, we will process personal data as necessary to comply with legal requirements related to your job application, such as record-keeping, audits, government inspections, and legal process compliance.

B. We may also process certain types of sensitive information (referred to as Special Category Personal Data under some privacy laws), such as health or medical information and details of any disabilities, race, gender, ethnicity and diversity information when permitted by local law or when you actively provide us with this information. We may also process political or religious affiliations, if you voluntarily provide us with this information, for example as part of an accommodation request.

**Purpose and Legal Grounds:** We collect this information for specific purposes, for example, in order to accommodate a disability or illness and to comply with legal obligations and internal policies relating to health and safety, occupational health, diversity, and anti-discrimination. We will only use such information for the stated purposes and as permitted by law. We process this information where it is necessary to comply with our legal obligations in the field of employment and social security/benefits, social protection law and tax law, and where it is needed for reasons of substantial public interest, such as for equal opportunities monitoring, where local laws permit. Alternatively, where we are required to do so, we will only process these types of personal information where we have obtained your consent. Exceptionally we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your vital interests (for example, avoiding serious risk of harm to you or others) and you are not capable of giving your consent or, where permitted, when you have already made the information public.

C. We may process information about criminal convictions, offenses and credit checks via background or security screening but will only do so if it is appropriate given the nature of the position for which you are applying and where we are permitted to do so in accordance with applicable law. Where appropriate, we may collect this information from third parties (such as background check providers) as part of the recruitment process, or we may be notified of such information directly by you.

**Purpose and Legal Grounds:** In these circumstances, we will use information about criminal convictions, offences and credit checks where it is necessary to protect your interests, our interests, and those of other employees and contractors, or to protect users and other third parties from theft, fraud and similar risks. It will also be used where necessary for related legal claims. We may be permitted to use your personal information in this way where it is necessary to comply with our employment obligations — including to provide a safe environment for our workers.

If you are in Canada, our processing of all these categories of personal information is based on having obtained your express or implied consent (unless we are relying on an exception from requiring consent or as otherwise permitted or required by law).

### **3. Disclosures Within DuckDuckGo and to Third Parties.**

From time to time, for the reasons set out in this Policy, we may transfer or disclose categories of personal information to:

- Service providers, for example applicant tracking providers and background check providers.
- Information technology providers, for example IT system and email providers.
- External professional advisors, for example accountants, auditors, lawyers and insurers.
- Government and law enforcement as required by law.
- In the course of a corporate transaction, to other companies and their advisors, for example, in connection with any proposed or actual investment or financing transaction, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of DuckDuckGo's business, assets or stock including in connection with any bankruptcy, consolidation, liquidation or similar proceedings.

Where these recipients are processing personal information on our behalf, we have data processing agreements in place to limit their access, use and disclosure of personal information, require appropriate safeguarding of personal information, and to restrict their processing and retention of personal information in the course of performing their contractual obligations to us.

#### **4. Storage, Security and Retention.**

We store most information about you in computer systems and databases operated by either us or our external service providers. We may retain information about unsuccessful applicants for two years in accordance with applicable privacy laws. This retention allows us to maintain a record of your application should you choose to reapply in the future, and comply with legal or regulatory obligations, such as record-keeping requirements. With your explicit consent, we may also retain your information for the purpose of contacting you about potential future job opportunities that align with your skills and experience. You may withdraw this consent at any time by contacting us at [careers@duckduckgo.com](mailto:careers@duckduckgo.com).

After the retention period or upon withdrawal of consent (where applicable), the information is deleted or aggregated.

If your application is successful, our Team Member Privacy Policy will be provided to you in due course and the retention periods in it will apply.

DuckDuckGo seeks to protect personal information using appropriate technical, physical and organizational measures to ensure a level of security appropriate to the risk associated with the applicable type of personal information and processing activity.

#### **5. International Transfer of Personal Information.**

DuckDuckGo operates globally and, we will, from time to time, transfer and disclose your personal information internationally to jurisdictions that may have different privacy laws. Where we transfer your personal information internationally, we will only do so to jurisdictions which have received adequacy decisions, or where we have put in place appropriate measures to ensure that your Personal Information is treated in a way that is consistent with applicable privacy laws, such as entering into Data Processing Agreements and/or Standard Contractual Clauses if you are in the EU or UK. For more information, please email [privacy@duckduckgo.com](mailto:privacy@duckduckgo.com).

## 6. Privacy Rights.

Depending on where you are located or reside, you may have certain privacy rights. For example, under the UK GDPR if you are located in the UK or the GDPR if you are located in the EU, CCPA if you reside in California and under provincial privacy sector privacy legislation in Canada. To help protect your privacy and maintain security, we will take steps to verify your identity before granting a data protection rights request.

If you are located in the UK, EU or Canada, you may have the following rights:

- **Right of access:** You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- **Right to rectification:** You have the right to ask us to correct personal information you think is inaccurate or incomplete.
- **Right to erasure:** You have the right to ask us to delete your personal information.
- **Right to restriction of processing:** You have the right to ask us to limit how we can use your personal information.
- **Right to object to processing:** You have the right to object to the processing of your personal information.
- **Right to data portability:** You have the right to ask that we transfer the personal information you gave us to another organization, or to you.
- **Right to withdraw consent:** When we use consent as our lawful basis you have the right to withdraw your consent at any time (which, in Canada is subject to reasonable notice and legal restrictions).

If you reside in California, you have the following rights:

- **Right to know:** You have the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- **Right to delete:** You have the right to request that we delete certain personal information we have collected from you.

- **Right to correct:** You have the right to correct inaccurate personal information that we maintain about you.
- **Right to opt out of sale or share:** We do not “sell” your personal information to third parties in exchange for money and we do not “sell” your personal information, as described by the CCPA, for other valuable consideration. We also do not “share” your personal information, as described by the CCPA.
- **Right to opt out of automated decision making:** You may request to opt out of automated decision making, including profiling, or to learn more about the algorithmic logic involved and to know about the likely outcome in our decision-making process.
- **Right to data portability:** You have the right to obtain your personal information in a portable, and to the extent technically feasible, readily useable format, which you can use to transmit your personal information to another entity.
- **Right to limit the use and disclosure of sensitive personal information:** We do not use sensitive information about you in your role as a Covered Individual except to facilitate the recruitment and hiring process and other compatible uses, so the right to limit the use of sensitive information does not apply.

Please know that the privacy rights in California outlined above are subject to exceptions. We will confirm receipt of every request within 10 business days and respond to every request within 45 calendar days. We may extend that response time as appropriate, if permitted. We will not retaliate or discriminate against you for exercising any of these privacy rights.

If you are resident in Australia, you may have the following rights:

- **Access to and correction of your personal information:** As an Australian resident, you may access or request correction of the personal information we hold about you by contacting us. Our contact details are set out in "How to Contact Us or Submit a Request" below. We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date, complete, relevant and not misleading.
- **Complaints:** If you think we have mishandled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out in "How to Contact Us or Submit a Request" below. We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any

subsequent internal investigation. If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) ([www.oaic.gov.au](http://www.oaic.gov.au)) for guidance on alternative courses of action which may be available.

To make a privacy rights request, see "How to Contact Us " below.

You have the right to lodge a complaint about DuckDuckGo's practices with respect to your personal information with the supervisory authority where you are located.

## 7. How to Contact Us or Submit a Request.

If you have any questions or concerns about how we process your personal information or would like to exercise any of your rights, please email [privacy@duckduckgo.com](mailto:privacy@duckduckgo.com). We hope to resolve any concerns you may have, but subject to applicable law, you may also have the right to lodge a complaint with your local supervisory authority about our data practices.

Our representative under Article 27 of the GDPR is IT Governance Europe Limited, Third Floor, The Boyne Tower, Bull Ring, Lagavooren, Drogheda, Co. Louth, A92 F682. [eurep@itgovernance.eu](mailto:eurep@itgovernance.eu).

Our representative under the UK GDPR is GRCI Law Limited, Unit 3, Clive Court, Bartholomew's Walk, Cambridgeshire Business Park, Ely, CB7 4EA, UK. [ukrep@grcilaw.com](mailto:ukrep@grcilaw.com).

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USA	Duck Duck Go, Inc.	DuckDuckGo, 20 Paoli Pike, Paoli, PA 19301 U.S.A.
Canada	DuckDuckGo Canada, Inc.	77 King Street W, Suite 400, Toronto, ON M5K 2A1
UK	DuckDuckGo UK Limited	5th Floor One New Change, London, United Kingdom, EC4M 9AF
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