

Calix, Inc. EEA+ Supplemental Job Candidate Privacy Notice

Last Updated July 6, 2023

Calix, Inc. (“**Calix**” or “**we**”) provides to residents of the European Economic Area, Switzerland, and the United Kingdom (“**EEA+**”) the following disclosures to supplement the Calix, Inc. Job Candidate [Privacy Notice](#) (“**Privacy Notice**”). References below to the “**GDPR**” are to the European Union General Data Protection Regulation 2016/679 and the UK GDPR.

1. DATA CONTROLLER AND EU REPRESENTATIVE

The data controller is Calix, Inc., a US corporation organized under the laws of the State of Delaware and based at 2777 Orchard Parkway, San Jose, CA 95134 in the United States. You can contact our representative in the EU by email: DPO@calix.com. Persons in the UK can contact our representative in the UK, Calix Networks UK Ltd., by email: DPO@calix.com or mail: 5 Churchill Place, 10th Floor, London, United Kingdom, E14 5HU.

2. LEGAL BASES FOR COLLECTING AND PROCESSING PERSONAL DATA

We collect and process your personal data based on the following legal bases:

- Based on your prior consent to process the personal data you submit in your initial submission (GDPR Art. 6 (1)(a) and the corresponding provisions under local data protection law).
- Based on our legitimate interests to evaluate your credentials and decide whether to appoint you to the work or role you applied for or similar roles in the Calix Group, as well as enforce compliance with any Calix policies and procedures (GDPR Art. 6 (1)(f) and the corresponding provisions under local data protection law).
- Based on our necessity to perform a contract of employment or a contract for services with you (GDPR Art. 6 (1)(b) and the corresponding provisions under local data protection law).
- Based on our legal obligations to conduct internal audits and workplace investigations, comply with applicable laws and regulatory requirements, or respond to lawful requests, court orders, and legal processes (GDPR Art. 6 (1)(c) and the corresponding provisions under local data protection law).
- Based on our legitimate interests to evaluate the personal data you submit in connection with any behavioral assessment quiz you may take for determining your suitability for the role you applied for or similar roles in the Calix Group (GDPR Art. 6 (1)(f) and the corresponding provisions under local data protection law).

We also rely on the following legal bases for the collection of any special categories of data:

- Based on our purposes of carrying out the obligations and exercising our or your specific rights in the field of employment and social security and social protection law (GDPR Art. 9(2)(b) and the corresponding provisions under local data protection law).

- Based on our purposes of protecting your vital interests as a data subject (GDPR Art. 9(2)(c) and the corresponding provisions under local data protection law).
- Based on our purposes of assessing the working capacity of an employee or the provision of health or social care or treatment, as applicable (GDPR Art. 9(2)(h) and the corresponding provisions under local data protection law).

In addition, we rely on our legitimate interest as a legal basis (GDPR Art. 6(1)(f)) to retain your personal data after your application has been withdrawn or rejected. You have the right to opt out of such retention at any time, but the lawfulness of processing prior to opting out will not be affected.

3. RECIPIENTS OF DATA IN THIRD COUNTRIES

We may share personal data with affiliates, vendors, agents, or other third parties as required or permitted by applicable law.

The personal data that we collect or receive about you may be transferred to and processed by recipients that are located inside or outside the EEA+ and which are not recognized from an EEA+ law perspective as providing for an adequate level of data protection. The countries that are recognized to provide for an adequate level of data protection from an EU law perspective (Art. 45 GDPR) are: Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the United Kingdom and Uruguay. To the extent your personal data are transferred to countries that do not provide for an adequate level of data protection from an EU, Swiss, or UK law perspective, we will base the respective transfer on appropriate safeguards (Art. 46 GDPR/UK GDPR), such as standard data protection clauses adopted by the European Commission. You can ask for a copy of such appropriate safeguards by contacting us as set out in the “Contact Us” section in our Privacy Notice.

4. PERIOD OF DATA STORAGE

Your personal data will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 6 months from the date of the withdrawal or rejection of your application. When we no longer need to use your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it, unless we need to keep your information, including personal data, to comply with statutory retention periods, such as for tax, audit, or legal compliance purposes, for a legally prescribed time period thereafter, or if we need it to preserve evidence within statutes of limitation.

It is likely that we will wish to seek your consent to retain your personal data after the recruitment process is completed for a period of two years for any further opportunity may arise in the future that we may wish to consider you for or for record keeping purposes. If so, we will write to you separately to seek your consent to retain your personal information on that basis (where we rely on consent as a legal basis for data processing under the GDPR or UK GDPR, you may withdraw your consent at any time). We will delete your personal information if you do not provide your consent for us to retain your personal information for this purpose.

5. DATA SUBJECT RIGHTS

Under applicable law, you may have the following rights in relation to your personal data. These may be limited under applicable data protection law.

- **Right of access.** You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purposes of the processing, and the recipients or categories of recipients. This is not an absolute right, as we have to take into account the interests of others. You have the right to obtain a copy of the personal data undergoing processing, but we may also charge a fee if you want to request more than one copy.
 - **Right to rectification.** You have the right to obtain from us rectification of inaccurate or incomplete personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
 - **Right to erasure (right to be forgotten).** You have the right to ask us to erase personal data concerning you.
 - **Right to restriction of processing.** In limited circumstances, you have the right to request that we restrict processing of your personal data.
 - **Right to data portability.** You have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that personal data to another entity without hindrance from us.
- **Right to object.** Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we can be required to stop processing your personal data.
- **Right to withdraw consent.** If you have declared your consent for any personal data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

You can exercise one or more of these rights as applicable to you by contacting Calix's data protection officer by email at dpo@calix.com. If you would like to correct, update, delete, or request access to the personal data that you have provided to us, please submit the following [Request Form](#) (clicking the link will take you to TrustArc, whom we have engaged to assist with personal data requests).

For your protection, we will only implement requests with respect to personal data about you (not anyone else), and we may need to verify your identity before implementing your request. We may need to retain certain information for recordkeeping purposes, as required under applicable legal obligations. And even if you have a right to deletion, some of your information may remain within our systems and other records or archives, in compliance with applicable law.

Similarly, if you have any complaints about our privacy management practices, you can contact us at the same e-mail above. You may also have a right to raise your complaint with the relevant privacy regulator in your jurisdiction.

If you are in the United Kingdom, you have the right to make a complaint at any time to the United Kingdom Information Commissioner's Office (ICO) [here](#) or if you are in the European Economic Area to the Data Protection Authority for your country listed [here](#) with respect to data protection issues.

6. AUTOMATED DECISION-MAKING

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you in connection with the application process.