

California Job Applicant Privacy Notice

Last Updated: January 1, 2023

This Privacy Notice explains how StubHub, Inc. and its affiliates (collectively, “**Company**,” “**we**,” “**our**,” or “**us**”) collects, uses, discloses, and otherwise processes personal data about our California-based recruits and job applicants. This Privacy Notice is not a contract and does not create any legal rights or obligations. This Privacy Notice also is not intended to replace other notices or disclosures we may provide to an individual in connection with their application for a job or eventual role in our organization, which will supersede any conflicting disclosures contained in this Privacy Notice.

What is Personal Data?

When we use the term “personal data” in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual within the context of the individual acting as a recruit or job applicant of Company. It does not include aggregated or de-identified information that is maintained in a form that cannot reasonably be used to infer information about, or otherwise be linked to, a particular individual. Where we maintain de-identified data, we will maintain and use the data in de-identified form and not attempt to re-identify the data except as required or permitted by law.

Our Collection of Personal Data

During the recruiting process and when an individual applies for a job with us, we may collect the following professional or employment-related personal data, in each case, only to the extent permitted by applicable law:

- **Contact Information:** such as full name, email address, home address and telephone number.
- **Professional History & Qualifications:** such as previous employers, positions and work experience, professional licenses, certificates or other qualifications, employment references or referrals, and information relating to potential conflicts with the role for which the individual is applying or being considered.
- **Educational History & Qualifications:** such as highest level of education, the schools the individual attended and when they were in attendance, degrees, certificates, or other educational qualifications the individual earned, and the individual’s transcripts or educational references.
- **Compensation Information:** such as previous or desired salary, bonus, benefits, expenses, and stock or equity grants, as permitted by law.
- **Equal Opportunity Information:** such as age, race, ethnicity, national origin, citizenship, sex, gender identity or transgender status, sexual orientation, religion, disability, or accommodation request, or marital or veteran status, in each case, when an individual chooses to provide it; provided, however, such information is not used for any employment or hiring decisions unless specifically permitted by law.
- **Web-Related Information:** such as technical details about the individual’s visit to our online services contained in log files or analytics data relating to their usage and activity on our online services. For more information, please refer to the general [Privacy Notice](#) on our website. The Privacy Notice governs our use of information collected from our website visitors. If there is any

conflict between our website Privacy Notice and this Job Applicant Privacy Notice, the Job Applicant Privacy Notice will govern with respect to our use of personal data in connection with recruiting and job applications.

- **Other Application and Interview Information:** any personal data the individual chooses to share with us in their interview or application, CV, resume, transcripts, or other supporting documentation.
- **Inferences:** we may generate inferences or predictions about recruits and job applicants, and their abilities, interests, or preferences based on the other personal data we collect and the interactions we have with them.

Although we often collect the personal data described above directly from the individual, we may also collect certain information from references, recruiters, job-related social media sites (such as LinkedIn), and publicly available sources (such as government records and social media sites). In addition, we may also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, scheduling providers and application providers.

Our Use of Personal Data

We may use the personal data we collect during the recruiting process and when an individual applies for a job with us to do the following, in each case, only to the extent permitted by applicable law:

- Identify the individual as a potential candidate and review their application for a position with us;
- Verify the information provided to us in connection with their application or received from other sources;
- Determine their eligibility and suitability for the potential position or other opportunities with us;
- Facilitate the recruiting and interview process;
- Communicate with the individual about the status of their application or other opportunities with us that may be of interest to them;
- Assess and improve the performance and success of our recruiting and hiring process;
- Conduct internal investigations, audits, compliance, risk management, problem resolution and security operations;
- Fulfill contractual obligations to recruits, applicants and other third parties;
- Comply with applicable law, rule, regulation, legal proceeding, and government investigations, including relating to tax reporting and immigration.

Please note that if an individual accepts an offer from us, we may transfer the personal data we collected about them during the recruiting and job application process to their personnel file with us.

Our Disclosure of Personal Data

We may share your personal data with the following third parties for the purposes described below, in each case, only to the extent permitted by applicable law:

- **Within Company:** We share personal data relating to recruits and job applicants within our family of companies for internal administrative purposes and uses that are consistent with this Privacy Notice. For example, the Company entity responsible for the job posting may share personal data

about an applicant with another Company entity that is responsible for our organization-wide recruiting and employment decisions.

- **Recruiters and Job Application Providers:** We sometimes engage recruiters and job application providers to assist us in identifying potential job applicants and processing job applications we receive. In order for these third parties to assist us in the recruiting and job application process, we share personal data about potential and current personnel with them.
- **Other Service Providers:** In addition to the third parties identified above, we engage other third parties to perform certain functions on our behalf in connection with the uses of personal data described in the **Our Collection of Personal Data** and **Our Use of Personal Data** sections above, including assisting us with our recruiting process, personnel management, benefits and services offerings and other related business operations. Depending on the function the third party serves, the service provider may process personal data on our behalf or have access to personal data while performing functions on our behalf.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal data to a third-party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- **Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws and regulations or to respond to lawful requests and legal process;
 - to protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us;
 - to protect the health and safety of us, our customers, or any person; or
 - as otherwise required by applicable law.
- **Otherwise with Consent or Direction:** We may disclose personal data about our recruits and job applicants to certain other third parties with their consent or direction.

Sales, Sharing or Targeted Advertising

Except as otherwise described in our [Privacy Notice](#) in connection with job applicants acting in their capacity as website visitors, we do not sell personal data about individuals acting in their capacity as job applicants, and we do not share or otherwise disclose personal data about individuals acting in their capacity as job applicants to third parties for the purpose of displaying advertisements that are selected based on personal data obtained or inferred over time from an individual's activities across businesses or distinctly-branded websites, applications, or other services (otherwise known as "**targeted advertising**" or "**cross-context behavioral advertising**").

Sensitive Information of Recruits and Job Applicants

The following personal data elements we collect may be classified as "sensitive" under certain privacy laws ("**sensitive information**"):

- Information relating to racial and ethnic origin, religious beliefs, health, disabilities, sexual orientation, gender identity and transgender status.

We may use this sensitive information for the purposes set forth in the **Our Collection of Personal Data** and **Our Use of Personal Data** sections above. We do not sell sensitive information, and we do not process or otherwise share sensitive information for the purpose of targeted advertising. However, subject to certain legal limitations and exceptions, you may be able to limit our processing of sensitive information (as described in the **Your Privacy Choices** section below).

Retention of Personal Data

We retain personal data only for as long as is reasonably necessary to fulfil the purpose for which it was collected. However, if necessary, we may retain personal data for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so in accordance with legal, tax and accounting requirements set by a legislature, regulator, or other government authority.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations.

Once retention of the personal data is no longer necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if this is not possible (for example, because personal data has been stored in backup archives), then we will securely store the personal data and isolate it from further processing until deletion or deidentification is possible.

Your Privacy Choices

California Privacy Rights

As a California resident, you may be able to exercise the following rights (subject to certain limitations at law):

<p><i>The Right to Know</i></p>	<p>The right to confirm whether we are processing personal data about you and, under California law only, to obtain certain personalized details about the personal data we have collected about you, including:</p> <ul style="list-style-type: none"> • The categories of personal data collected; • The categories of sources of the personal data; • The purposes for which the personal data were collected; • The categories of personal data disclosed to third parties (if any), and the categories of recipients to whom the personal data were disclosed; • The categories of personal data shared for cross-context behavioral advertising purposes (if any), and the categories of recipients to whom the personal data were disclosed for those purposes; and • The categories of personal data sold (if any), and the categories of third parties to whom the personal data were sold.
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<i>The Right to Access & Portability</i>	The right to obtain access to the personal data we have collected about you and, where required by law, the right to obtain a copy of the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
<i>The Right to Correction</i>	The right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data.
<i>The Right to Control Over Sensitive Information</i>	The right to exercise control over our collection and processing of certain sensitive information.
<i>The Right to Deletion</i>	The right to have us delete the personal data we maintain about you.
<i>The Right to Control Over Automated Decision-Making / Profiling</i>	The right to direct us not to use automated decision-making or profiling for certain purposes.

You also have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights. However, please note that if the exercise of these rights limits our ability to process personal data, we may no longer be able to engage with you in the same manner.

Submitting Privacy Rights Requests

To submit a request to exercise one of the privacy rights identified above, please contact hr@stubhub.com and indicate your request type from the table above. Before processing your request, we will need to verify your identity and confirm you are a resident of the State of California. In order to verify your identity, we will generally either require the successful authentication of your work-related account, or the matching of sufficient information you provide us to the information we maintain about you in our systems. As a result, we require requests to include your name, contact information, and some form of identification that confirms your identity and California residence. We may at times need to request additional personal data from you, taking into consideration our relationship with you and the sensitivity of your request.

In certain circumstances, we may decline a privacy rights request, particularly where you are not a resident of the State of California or where we are unable to verify your identity.

Submitting Authorized Agent Requests

In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent's authority to act on your behalf. In order to verify the authorized agent's authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

Appealing Privacy Rights Decisions

Depending on your state of residency, you may be able to appeal a decision we have made in connection with your privacy rights request. All appeal requests should be submitted to hr@stubhub.com.

Updates to This Privacy Notice

We will update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the “Last Updated” date at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify you by prominent posting at the beginning of this Privacy Notice. All changes shall be effective from the date of publication unless otherwise provided in the notification.

Contact Us

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to hr@stubhub.com.