

Scope and purpose.

Workfront Inc. (“Workfront”) takes the protection of personal data seriously. Workfront is committed to safeguarding the privacy of personal information, meaning any information relating to an identified or identifiable natural person, that we gather about prospective employees or interns (“Workfront Recruits”). This privacy policy (the “Recruiting Privacy Policy”) informs you of our policies regarding the collection, use, disclosure, transfer, and storage (“Processing”) of all personally identifiable information (“Personal Data”) and other data that is provided to us through the recruiting process, including data collected via Workfront’s mobile applications and at recruiting events. How we process your personal data may vary by jurisdiction based on applicable law.

Personal data we collect.

We may collect and process contact information, such as name, email address, physical addresses, and telephone number in order to communicate with you directly related to the application you have submitted such as to aid in setting up phone or onsite interviews. When you complete a job application we will ask for information such as resume (CV) or background check related information and may review public records information in order to evaluate your qualifications for the job in which you applied. As part of the application process we may request additional information described at the time it is collected or as necessary to establish, administer, and manage the recruitment process. We may collect the following information when allowed by law or with your consent: Racial or ethnic origin, and criminal history. Workfront may collect this information in a variety of ways. For example, personal information might be collected via the application process on our

careers website. Resumes or CVs, may be collected at interviews or other forms of assessment during the application evaluation process. While most of this personal information is collected directly from you, Workfront also may collect information from third parties, such as references supplied by former employers, or recruiting agencies that supply Workfront with potential job applicants, in relation to evaluating your eligibility for employment.

How we use and retain your personal information.

Workfront processes your personal information to administer recruitment activities, such as using your information to contact you about potential job opportunities and to take the steps necessary prior to entering into an employment relationship. As part of the recruitment process, Workfront may process your personal information in the following ways: establishing, administering, and managing all aspects of the employment application process (travel, expenses, development, training, and human resources-related processes); where necessary to comply with applicable legal or regulatory requirements; evaluating and reporting the demographic makeup of our workforce where allowed by law (e.g., diversity reporting); communicating with you; and other purposes described to you at the time we collect your personal information. The personal information collected will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Privacy Statement or as otherwise required. Generally this means your personal information will be retained until the end of your employment application review period plus a reasonable period of time thereafter to respond to application-related inquiries, to deal with any legal matters (e.g. judicial actions) or, as applicable.

Disclosure.

As part of the recruitment process, Workfront may disclose personal information to the following recipients: Your personal information may be shared internally within the Workfront group with Workfront personnel, contractors, and vendors who require such information to assist Workfront with establishing, administering, and managing the recruiting process such as members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy, and IT staff if access to the data is necessary for the performance of their roles; third-party service providers which process personal information as data processors on behalf of Workfront to provide certain services; third parties with whom you instruct Workfront to share your personal information; law enforcement, other government entities, or authorized third parties where Workfront has a good faith belief such disclosure is required to comply with applicable law or to respond to a valid legal process; other third parties to act on a good faith belief that disclosure is necessary to protect your, or other third parties' safety; other corporate entities if Workfront goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets; and third parties processing personal information on Workfront's behalf must abide by our data privacy and security requirements and may only process personal information as instructed by Workfront.

Tracking technologies.

When you visit Workfront's recruiting web pages or the recruiting portions of our site, Workfront may observe your activities, interactions, preferences, transactional information, and other computer and connection information (such as IP address) relating to your use of our websites and our services. We or our service providers may use cookies and other technologies similar to cookies such as web beacons, tags, and scripts. We use these technologies to authenticate your access to our recruiting site.

Data transfers.

Workfront is headquartered in the United States and primarily stores recruiting data in the United States. However, personal information collected about you may be stored and processed in your region, the United States, or in any other country where Workfront or its subcontractors maintain operations. Third parties processing personal information on Workfront's behalf are required to comply with applicable laws, including without limitation onward transfer requirements. Workfront complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework(s) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and the United Kingdom and/or Switzerland, (as applicable) to the United States in reliance on Privacy Shield. Workfront has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in our privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. For more information on Privacy Shield compliance, please visit www.privacyshield.gov.

Workfront commits to resolve complaints about our collection or use of your Personal Data. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Workfront at: privacy@workfront.com Workfront has chosen to cooperate with EU data protection authorities (DPAs) and comply with the information and advice provided to it by an informal panel of DPAs in relation to such unresolved complaints (as further described in the Privacy Shield Principles). Please contact us to be directed to the relevant DPA contacts. As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means. Workfront is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

Rights of a data subject.

If you are a recruit in the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you where we need the personal information to enter into a contract with you (i.e. enter into an employment or work relationship with us). Under the General Data Protection Regulation, you have certain rights as a data subject to exercise with the company in relation to the Personal Data we hold. Depending on the applicable laws and, in particular, if you are located in the EEA, these rights may include:

- To access your Personal Data held by us (right to access);
- To rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete (right to rectification);
- To erase/delete your Personal Data, to the extent permitted by applicable data protection laws (right to erasure; right to be forgotten);
- To restrict our processing of your Personal Data, to the extent permitted by law (right to restriction of processing);
- To transfer your Personal Data to another controller, to the extent possible (right to data portability);
- To object to any processing of your Personal Data carried out on the basis of our legitimate interests (right to object). Where we process your Personal Data for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- Not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"). Automated Decision-Making currently does not take place on our websites; and
- To the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

To exercise your rights, please contact us using the Privacy Request Portal at www.workfront.com/privacy-policy. We aim to respond to all legitimate requests within 30 days and will contact you if we need additional information from you in order to honor your request.

If you are a resident of California, under the age of 18 and have registered for an account with us, you may ask us to remove content or information that you have posted to our websites. Please note that your request does not ensure complete or comprehensive removal of the content or information, because, for example, some of your content may have been reposted by another visitor to our websites.

Security.

Workfront takes reasonable and appropriate measures to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. These measures are appropriate to the risks involved and the nature of the Personal Data. Although Workfront seeks to protect the privacy of others who use our Service, there is an inherent risk in internet based activities so there is no 100% guarantee of absolute security.

Choice.

You are under no statutory or contractual obligation to provide personal information to Workfront during the recruitment process and you may choose not to provide some of the personal information for the purposes set out in this Recruiting Privacy Statement. Depending on the information you may choose not to provide, we may not be able to process your application, request or onboard for employment related purposes.

Deletion.

To request that your personal information be deleted, please contact us by using the the Privacy Request Portal at www.workfront.com/privacy-policy or mailing address provided below.

Contact.

If you have any questions about this Statement, or the personal information we process about you, please contact the Privacy Team at privacy@workfront.com or by regular mail addressed to: Workfront, Inc. Attn: Privacy 3301 North Thanksgiving Way, Lehi, UT 84043. If you are a resident in the European Union, and are unsatisfied with the responses provided to you regarding the processing of your personal information you have the right to lodge a complaint with the relevant data protection supervisory authority.

Changes to this privacy statement.

The Service and our business may change from time to time. As a result, at times it may be necessary for Workfront to make changes to this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice.

Last updates: **May 1, 2019**

