

Avanade Recruitment and Hiring Privacy Statement

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If you are a California resident, please see our specific privacy statement for California residents [here](#).

If you are a California resident, you have specific privacy rights under the California Consumer Privacy Act ("CCPA"). You can [opt-out here](#) from any selling of your personal information.

This statement is also available in the following languages

[Chinese](#)

[Dutch](#)

[French \(France\)](#)

[German](#)

[Italian](#)

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[Spanish](#)

In the event of any conflict between the English version and any translations of this Privacy Statement, the English version of this Privacy Statement shall prevail.

Introduction and who is collecting your personal data?

The below explains how Avanade Inc. and/or its [affiliates](#), subsidiaries and newly acquired companies ("Avanade"; "we") protect the personal data we process and control relating to you ("your personal data"; "your data") and which rights you have in relation to the processing of your personal data if you use Avanade's online career resources, when you apply for a job at Avanade when you are interested in applying for a job and when undertaking pre-hire and/or onboarding actions. Any Avanade entity located outside the European Union will be represented by Accenture Global Holdings Limited.

What personal data will Avanade collect?

The types of information requested from you and the manner in which that information is collected and accessed are determined by the requirements of the country in which the position is located, and not the country in which you reside.

The following categories of data will be collected by Avanade:

- Your personal details;
- Data requested to provide during the recruitment process, to the extent allowed by applicable law;
- Data you submit in résumés / CVs, letters, writing samples, or other written materials (including photographs and videos);
- Data generated by interviewers and recruiters, based on their interactions with you or basic Internet searches where allowed under applicable law;
- Data provided by third-party placement firms, applicant matching platforms, recruiters, or job-search websites, where applicable;

- Photograph, and images/audio/footage captured on CCTV or other video systems when visiting our office or captured in the course of recruitment events or photograph, audio, video and/or transcripts from recruitment interviews and assessments;
- Recommendations provided on your behalf by others;
- Documentation required under immigration laws;
- Data about your prior employment, education, and where applicable, credit history, criminal records or other data revealed during background screenings;
- To the extent legally permissible, Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation, subject to legal limits on the timing of collection of such data and other applicable limitations.
- Data about race, ethnicity, religion, disability, sexual orientation, and gender identity, military/veteran status, for purposes of government reporting where required, as well as to support Avanade's diversity goals, evaluate the effectiveness of our equal opportunity policy and promote diversity best practices;
- In specific jurisdictions, we may collect social mobility data (this may include topics such as receiving free school meals, which type of school you attended, being the first in the family to attend university and the occupation of your main household earner when you were aged 14) to help us progress our social mobility agenda, drive our decision-making process as to which priorities we should focus on in social mobility, as well as help us to measure our progress.
- Data generated by your participation in psychological, technical or behavioral assessments. You will receive more information about the nature of such assessments before your participation in any of them.

One way that we collect information is through the use of cookies. Cookies are small files of information that save and retrieve information about your visit to our tools and websites. Please read our [cookies policy](#) for further information on this.

You are not required to provide any requested information to Avanade, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.

By submitting your information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.

Why will Avanade process your personal data and on which basis?

Avanade will use your personal data for the following purposes and on the following legal bases:

Purpose	Legal basis
Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available, for which a recruiter may connect with you directly.	Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.
Manage your application and undertake pre-hire and/or onboarding actions.	Justified on the basis of Avanade's legitimate interests of ensuring that it recruits/onboards the appropriate employees for current or future roles.
Facilitate communication with you, which may include AI-powered supported capabilities (involving facilitating meetings, meeting recaps and insights, email suggested content, etc.).	Justified on the basis of Avanade's legitimate interests of ensuring proper communication within the organization and with you.
Perform administrative functions (e.g. reimburse you for interview-related expenses).	Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.
Perform data analytics (which may involve the use of AI, e.g. machine learning), including analysis of our applicant pool to better understand who is applying to positions at Avanade and how to attract and keep top talent, and to assist with the sourcing and screening (but not for final recruitment decisions) when processing high volume of applications.	Justified on the basis of Avanade's legitimate interests of ensuring that it continually improves its recruitment processes.
Build profiles of candidates, including analysis of candidate data to gauge compatibility with a particular job and to develop estimates of future performance. Candidacy selection and hiring decisions are reviewed and conducted by an Avanade recruiting staff member and no automated decisions concerning candidacy are made without review by an Avanade recruiting staff member.	Justified on the basis of Avanade's legitimate interests in ensuring that it recruits the appropriate employees for current or future roles.
In some cases, take photos, record and/or transcribe your online interview and assessment (which may include AI-powered	Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.

Purpose	Legal basis
support capabilities) for review by additional recruiters and hiring managers.	
If you register on our Careers website or on other Avanade websites/tools/properties, we will enter you into a database to receive future mailings about Avanade positions, events and other relevant information you might be interested in. You may unsubscribe using the link provided in the emails you receive.	Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.
Transfer your contact information, education data, employment data, application information and the CV, all as supplied by you in our recruitment systems.	Justified on the basis of Avanade's legitimate interests of ensuring that it recruits the appropriate employees for current or future roles.
Perform any legally required reporting and respond to legal process.	Compliance with a legal obligation.

Where the above states that we rely on our legitimate interests for a given purpose, we did consider your potential interests, fundamental rights and freedoms and if those could be impacted by our processing activities. We did balance your interests, rights and freedoms against our interests, taking into account the processing, the security of your data and our existing relationship with you. Based on this balancing test and with our efforts to inform you in a very transparent way of the processing activities, we are of the opinion that it does not materially impact any of your interests, rights and freedoms by processing your data. Please contact us if you wish to obtain further information on the balancing test we performed.

We will process your personal data for the purposes mentioned in the table above based on your prior consent, to the extent such consent is mandatory under applicable law.

To the extent you are asked to accept this statement in one of our tools, such acceptance will be considered as your consent to process your personal data, only in the countries where such consent is mandatory. In all other countries, clicking on acceptance/agreement buttons, will be considered as a mere acknowledgement of this statement.

Avanade will not use your personal data for purposes that are incompatible with the purposes listed in this privacy statement, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

From what sources will Avanade obtain your personal data?

Avanade may obtain data about you from the following sources:

- From you, when you submit resumes or other information online;
- From other Avanade affiliates;
- From conversations with recruiters and interviews with hiring managers and other Avanade personnel or representatives, some of which may be recorded as well as from Internet searches that these individuals may perform (where allowed by applicable law), or data that they may obtain from job search or professional networking websites (e.g. monster.com, LinkedIn, etc.) where you may have made data about yourself publicly available;
- From previous employers;
- From social media (where allowed by applicable law);
- From third-party recruiters, applicant matching platforms, staffing companies, or websites where you are introduced to Avanade through one. Avanade does not accept unsolicited resumes from 3rd party recruitment agencies, but does sometimes use such agencies subject to a written agreement. Any resume or other candidate information submitted outside of established candidate submission guidelines (including through the Careers website or via email to any Avanade employee) and without a written agreement or otherwise will be deemed to be provided for Avanade's use, and no fee will be paid should the candidate be hired by Avanade; and
- From background checks, as applicable. Where permitted by law, Avanade may contract with a third party to perform a pre-employment background screening. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. You will receive more information about the nature of such a background check before it begins. Where required by applicable local law, you may be asked to provide certain background check information, (which may include sensitive data) directly to Avanade.

Who will have access to your personal data? Where are they located?

In general, access to your personal data will be restricted to minimize the number of people in Avanade's global organization who need it for the purposes set out in this Privacy Statement, which may include your potential future managers and their designees, personnel in HR, IT, Compliance, Marketing, Legal, Finance and Accounting and Internal Audit.

As a global organization with global IT systems, your personal data may be transferred to other Avanade offices in Avanade's worldwide organization. Avanade has internal policies to ensure an equivalent level of protection is in place across Avanade's worldwide organization. Any transfers of your personal data to other Avanade offices (including transfers from within the European Economic Area (EEA) to outside the EEA) will be governed by Avanade's binding corporate rules (a copy of which can be found [here](#)).

Furthermore, where there is a need, Avanade may share your personal data with third parties, such as third party service providers and public authorities. Before doing so, Avanade takes steps to protect your personal data. Any service providers and professional advisors to whom your personal data are disclosed, are expected and required to protect the confidentiality and security of your personal data and may only use your personal data in compliance with applicable data protection laws. The following categories of third parties will have access to your personal data:

- Recruiters working with the country where the position you are applying for is based. Such individuals may be based in a different country;
- Hiring managers and other interviewers. Often these individuals will be based in the country where the position is based, but in some cases, they may be located in other countries;
- The global Avanade Talent Acquisition team, consisting of a limited number of individuals based in several countries;
- Individuals performing administrative and IT support functions;
- Authorized personnel at our service providers, including those that:
 - o host and support the Avanade talent acquisition system, talent connection or similar hiring/recruitment/talent management/HR related systems;
 - o host/manage virtual/online interviews, which may include recording interviews where live interviews are not possible;
 - o provide analytics services to assist with/optimize the screening and sourcing process to find and hire candidates (always subject to a final human decision);
 - o send recruitment experience feedback surveys to candidates who have applied for open jobs applications;
 - o perform background screenings, where applicable. These companies may be based in another country, and may obtain data from other countries where you have lived, worked or studied, as may be relevant as part of a background check. You will receive more information about any such check before it begins;
 - o assist Avanade in conducting psychological, technical or behavioral assessments; and any other recruitment, onboarding and HR related service providers of Avanade.
- Government officials where legal reporting requirements may exist, or law enforcement agencies or private litigants in response to valid law enforcement process (warrant, subpoena, or court order); and
- A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Avanade business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- A third party in connection with any proposed or actual client project, to the extent allowed by applicable law.

Unless you are otherwise notified, any of your personal data from within the European Economic Area to third parties outside the European Economic Area EEA) will be based on an adequacy decision or are governed by the standard contractual clauses (a copy of which can be obtained by contacting AvanadeDPO@avanade.com). Any other, non-EEA originating, international transfers of your personal data, will take place in accordance with the appropriate international data transfer mechanisms and safeguards. To the extent your consent is required in your country to transfer your personal data from your country to another country or to a third party, your agreement with our privacy statement is considered as your consent to transfer your personal data to such country and/or third party.

How long will Avanade retain my personal data?

If you are given and accept an offer of employment by Avanade, personal data collected during your pre-employment period will become part of your Avanade personnel records, to be retained throughout and for a period after your employment with Avanade. If Avanade does not employ you, Avanade may nevertheless continue to retain and use personal data collected during the recruitment process in order to consider you for new positions, and, if appropriate, to refer back to an earlier application if you submit a resume or other information to Avanade again in the future, as well as for system administration, to perform research and analysis. You may unsubscribe from Avanade emails using the link provided in the emails you receive.

Avanade determines the retention period of your information based on the following retention criteria:

- Avanade retains your personal data as long as it has an ongoing relationship with you;
- For as long as allowed by applicable law, Avanade retains your personal data to match them against future open roles that we may want to inform you about;
- Avanade retains your personal data where it is required to do so by a legal obligation to which it is subject;
- Avanade retains your personal data where this is advisable to safeguard or improve Avanade's legal position (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

How Avanade protects your personal data.

We maintain organizational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake.

We adopt market leading security measures to protect your personal data. This includes (without being limitative):

- We hold an ISO27001 certification, which indicates that we adhere to the high and strict information security standards. This is a security standard awarded by DEKRA that serves as international certification that Avanade adheres to the highest and strictest standards. This certification is the only auditable international standard that defines the requirements for an Information Security Management System (“ISMS”) and confirms that Avanade’s processes and security controls provide an effective framework for protecting our clients’ and our own information.
- We have a global Client Data Protection (“CDP”) program in place which governs the stewardship of client information and systems entrusted to us.
- We have regular penetration testing performed by a third-party provider, which continues to show the strength of our technical defenses.

Which rights do you have with respect to the processing of your personal data?

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data;
- request rectification of your personal data: this right entitles you to have your personal data be corrected if it is inaccurate or incomplete;
- object to the processing of your personal data: this right entitles you to request that we no longer process your personal data;
- request erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes;
- request the restriction of the processing of your personal data: this right entitles you to request that we only process your personal data in limited circumstances, including with your consent;
- request a copy or the portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to us, or request us to transmit such personal data to another data controller.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting [Avanade’s Data Privacy Officer](#). Please note that this will not affect Avanade’s right to process personal data obtained prior to the withdrawal of your consent, or its right to continue parts of the processing based on other legal bases than your consent.

If, despite Avanade’s commitment and efforts to protect your personal data, you believe that your data protection rights have been violated, we encourage and welcome individuals to come to Avanade first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the relevant supervisory authority or to make a claim against Avanade with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed).

If you would like to exercise your erasure, rectification, or access rights in reference to your data as a job applicant, you may contact Avanade’s [Data Protection Officer](#).