

**Last Updated: July 2018**

The Colgate-Palmolive Company and our subsidiaries and affiliates (together “**Colgate**”, “**we**”, or “**us**”) value your trust and are committed to the responsible management, use and protection of your personal data. This Applicant Privacy Policy (“**Policy**”) describes our practices in connection with all the data that we collect through the hiring process and, if applicable, Career section of our website (located at <https://jobs.colgate.com/>), (“**Career Site**”) in connection with your application for a job or internship with Colgate. Personal data submitted elsewhere on Colgate’s web sites will be used in accordance with our general online Privacy Policy found at <https://www.colgatepalmolive.com/en-us/legal-privacy-policy>.

## **PERSONAL DATA WE COLLECT**

### **Personal Data You Provide**

We collect personal data from you in connection with your Career Site account and/or application:

Personal data we collect includes:

- Name, address, telephone number, e-mail address, and other contact information;
- Password;
- CV/resume, cover letter, previous work experience and education information;
- Skills;
- Interest level;
- Professional and other work-related licenses, permits and certifications held;
- Information relating to references; and
- Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships).

As discussed in the “Diversity” section below, in certain cases we will ask questions that may include information about race, ethnic origin, age, military status, gender, and disability of our applicants, for compliance with equal employment opportunity laws and regulations. We may also inquire about criminal records and will do so only where permitted by applicable law. Otherwise, we ask that you avoid submitting information that may qualify as sensitive personal data under applicable law, except where such information is legally required. Sensitive personal data includes race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, military or veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings.

Any personal data you submit in your application process must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading personal data may lead to a rejection of your application during the application process or, for employees, disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that personal data you submit does not violate any third party’s rights.

If you provide us with personal data of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the personal data to us.

## **Personal Data from Other Sources**

For the purpose of background check reports in connection with your application, and as permitted by applicable law, Colgate obtains your personal data from other sources:

Other sources may include:

- Your references;
- Prior employers;
- Educational institutions you attended;
- Law enforcement;
- Pre-employment medical screening providers

## **USE OF PERSONAL DATA**

We collect and process your personal data for one or more of these reasons:

- Because you voluntarily provided this personal data and consented to allow us to process it;
- Because this personal data is necessary to take steps, at your request, prior to entering into an employment relationship or internship;
- Because we have a specific legitimate interest under law to process this personal data;
- To comply with a legal obligation; or
- Where necessary to protect the vital interests of any person.

Where the collection or processing is based on your consent, you may withdraw your consent at any time to the extent permitted by applicable law.

The personal data that you submit to us will be used for Colgate's global personnel recruitment, management and planning purposes, as permitted by applicable law:

- To process your application. We will engage in these activities to manage our prospective employment relationship with you, based on our legitimate interests;
- To assess your capabilities and qualifications for a job. We will engage in these activities to manage our prospective employment relationship with you, based on our legitimate interests;
- To conduct reference checks. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To respond to your inquiries and communicate with you about your application, and to send you information regarding the Career Site and changes to our terms and conditions. We will engage in these activities to manage our prospective employment relationship with you;
- To comply with or monitor compliance with any applicable law or regulation. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- To conduct background checks (where legally allowed) if we are considering you for or offer you a position. We will engage in these activities to comply with a legal obligation or based on our legitimate interests; and

- To preserve our other legitimate interests, for example, for Colgate's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Colgate.
- To conduct a voluntary candidate experience survey by a third party vendor.

Your personal data will be added to Colgate's international candidate database and can be retained and used to consider you for opportunities at Colgate other than the one(s) for which you apply. If you do not wish us to do this, please contact us at the email address in the "*Contact Us*" section below.

If we hire you, personal data we collect in connection with your application can be incorporated into our human resources systems and used to manage the new-hire process; any such personal data can become part of your employee file and used for other employment-related purposes.

Providing personal data to us is voluntary. However, if you do not provide sufficient information, Colgate may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer or relocation.

## **DISCLOSURE AND TRANSFER OF PERSONAL DATA**

Colgate shares personal data with subsidiaries and affiliates that are involved in evaluating candidates for a given position. Colgate will remain responsible for personal data that is jointly used with affiliates. You can consult the list and location of our affiliates <https://www.sec.gov/Archives/edgar/data/21665/000002166518000006/exhibit2112312017.htm>. We will limit access to personal data to personnel with a business need to know the information for the purposes described in this Policy, including personnel in the talent acquisition, human resources and information technology departments, and in the department responsible for the position for which you are applying. Colgate also shares personal data with our third-party service providers to facilitate services they provide to us, including hosting and operating the Career Site, recruiting assistance, and background check processing.

Disclosing your personal data can include transferring personal data to other countries, including the United States or any other country in which we or our service providers have operations. If you are located in the European Economic Area (the "EEA") this may include countries outside of the EEA. Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards. The full list of these countries is available on the EU Commission's adequacy list found at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en). As for transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your personal data. You may obtain a copy of these measures by contacting us using the address in the "*Contact Us*" section below or by visiting [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

## **OTHER USES AND DISCLOSURES OF PERSONAL DATA**

We also use and disclose your personal data as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law.
  - This can include laws outside your country of residence.
- To respond to requests from public and government authorities.
  - These can include authorities outside your country of residence.
- To cooperate with law enforcement.
  - For example, when we receive law enforcement requests and orders.
- For other legal reasons.
  - To enforce our terms and conditions; and

- To protect our rights, privacy, safety or property, and/or that of our subsidiaries or affiliates, you or others.
- In connection with a sale or business transaction.
  - We have a legitimate interest in disclosing or transferring your personal data to a third party in the event of any sale, reorganization, joint venture or other business transaction

## **COOKIES AND SIMILAR TECHNOLOGY**

We and our Service Providers use “cookies” and similar technologies on the Career Site. Please see our Cookie Policy for more information.

## **DATA RETENTION**

We will retain personal data for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are: (i) the duration of the application process; (ii) the length of our ongoing relationship with you; (iii) as required by a legal obligation to which we are subject; (iv) as advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

We may remove personal data for inactive accounts from our database related to our online site, subject to any applicable legal or regulatory obligations. Furthermore, Colgate can delete personal data about you (including your CV/resume) from our database related to our online site at any time and without providing any reason. Therefore, please retain your own copy of the personal data provided to us.

## **CAREER CHOICES AND ACCESS**

If you register on the Career Site, you may access, review, and change your personal data stored therein by logging into the Career Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change personal data that you have already submitted for consideration for a specific position, please update your profile and update your application for that position. We encourage you to promptly update your personal data if it changes or is inaccurate.

You may, where permitted by applicable law, request to review, access, correct, update, restrict suppress or delete your personal data; request that we cease using your personal data as permitted by applicable law; or request a copy or portability of your personal data. Please make your request by contacting us as indicated below in the “*Contact Us*” section. We will respond to your request consistent with applicable law.

In your request, please make clear what personal data you would like to access or have changed, whether you would like to have personal data that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal data.

For your protection, we only implement requests with respect to the personal data associated with the particular email address that you used to create your account, and we may need to verify your identity before implementing your request. Please note that certain personal data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

## **ADDITIONAL INFORMATION FOR INDIVIDUALS IN THE EEA**

If you are located in the EEA, you also may:

- Contact us at [CP\\_Global\\_Recruitment@colpal.com](mailto:CP_Global_Recruitment@colpal.com) with any questions about this Policy.

- Lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct, whose contact information can be found at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

## **SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contact Us*” section below.

Colgate hereby disclaims, as far as permitted by local laws, any liability for itself and its subsidiaries, affiliates for any personal data we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to our Career Site.

## **LINKS TO THIRD-PARTY WEBSITES**

This Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Career Site links. The inclusion of a link on the Career Site does not imply endorsement of the linked site or service by Colgate.

## **APPLICABLE LAW**

The Career Site allows you to apply for jobs world-wide, as a benefit of Colgate’s centralized global recruitment function. This Career Site is operated from the United States. Accordingly, any personal data you submit to the Career Site will be collected in the United States and will be subject to U.S. laws. However, if we share your personal data with a subsidiary or affiliate located in another country in its capacity as a potential employer, the subsidiary or affiliate will handle your personal data in accordance with this Policy.

Any hiring or other employment-related decisions will be made by the hiring subsidiary or affiliate in accordance with the laws of the country where the job will be located.

## **ABOUT CHILDREN**

The Career Site is not intended for individuals under the age of 18.

## **CHANGES TO THE POLICY**

We reserve the right to amend this Policy at any time in order to address future developments of Colgate, the Career Site or changes in industry or legal trends. The “Last Updated” legend at the top of this Policy indicates when this Policy was last revised. Any changes will become effective when we post the revised Policy on the Career Site.

## **CONTACT US**

If you have questions or requests, please feel free to contact us at [CP\\_Global\\_Recruitment@colpal.com](mailto:CP_Global_Recruitment@colpal.com).

Because email communications are not always secure, please do not include sensitive personal data in your emails to us.