Rokt Global Candidate Privacy Notice

Last Updated: November 13, 2026

This Global Candidate Privacy Notice (this "Notice") explains how Rokt Inc. and its subsidiaries ("Rokt", "we", "us", or "our") collect, use, store, process, and disclose your personal data in the context of job recruiting, interviewing, and hiring. It also explains the automated and AI-assisted tools we use, how long we keep your data, and your rights. It applies wherever you are located; country-specific terms are in Section 13.

We provide this Notice at or before the point we collect your personal data: it is linked from every Rokt job posting and application form on our careers site (hosted by Workable) and from our website at rokt.com/careers.

Please note, this Notice does not apply to interactions you may have with Rokt in other contexts not related to recruiting, interviewing, and hiring. Those other interactions are subject to the privacy practices described in our website Privacy Policy (rokt.com/privacy-policy). If you are hired, personal data we collect during your onboarding and over the course of your employment will be subject to Rokt's Privacy Statement for Personnel, which will be made available to you separately.

For purposes of this Notice, the controller of your personal data is the Rokt entity recruiting for the role you apply for, as listed in Section 12. Where more than one Rokt entity is involved in a recruitment process (for example, a role that could be based in more than one country), those entities act as joint controllers and the entity listed for the primary location of the role is your point of contact.

1. What personal data will Rokt collect?

We may collect the following categories of personal data about you when you inquire about or apply for a job with Rokt:

- **Contact information:** We collect your name, email address, phone number, location (city/country), and any links you choose to share (for example, LinkedIn profile, portfolio or website).
- **Government identification:** We do not ask for government identification numbers or documents when you apply. If you receive an offer, we may collect identification documents (such as a passport, national ID or driver's license) to verify your identity and right to work, and to conduct background checks where permitted by law.
- **Demographics and information about legally protected classifications:** We ask about your work authorization and visa status for the country of the role and whether you will require sponsorship. In the United States, we may invite you to voluntarily provide equal employment opportunity information (such as gender, race/ethnicity, veteran status and disability status) for legally required reporting; providing it is optional, it is stored separately from your application, and it is not used in hiring decisions or made available to our AI tools. We do not ask for your date of birth.
- **Professional information and job qualifications:** We collect any information included in your CV/resume, cover letter and answers to application questions, which likely will include information about your employment history, such as previous employers, job titles, and achievements. We also keep records of information you provide about any professional certifications or qualifications you may have.

- **Preferences:** We collect information about your salary and compensation expectations, your preferred work location and in-office availability, and whether you are open to relocation.
- **Internet and device information:** Through the use of cookies and other tracking tools, we and our applicant tracking provider, Workable, collect information about your interactions with Rokt's recruiting and job websites, emails, or other digital platforms, such as your IP address, which jobs you view and apply for, and whether you open our recruiting-related emails.
- **Your job references:** We may request information about professional or personal references, such as the names, contact details, and affiliation of past employers or supervisors. We will also collect information that your job references share with us, such as impressions about your suitability for a particular role and descriptions of your prior work responsibilities.
- **Previous applications:** If you have applied for a job with Rokt in the past and then apply for another job, we may refer back to your prior application materials and any internal notes or impressions we developed, for as long as we retain them under Section 7.
- **Assessments and interviews:** If you progress in the process, we collect the results of any skills or aptitude assessments you complete, notes and evaluations our interviewers record, and, where we tell you in advance and local law permits, recordings and transcripts of interviews.
- **Background check information:** Where permitted by law and only after you have received an offer, we contract with a third party to conduct a pre-employment background check. The content of background check information varies by country to comply with local requirements, but may include identity and right-to-work verification, employment and education history, and, where lawful and relevant to the role, criminal record information, and information gathered from former employers, educational institutions and official sources. You will receive a separate notice, and where required, your authorization will be requested, before any check begins.
- **Inferences and AI-generated content:** We may draw inferences about you from the information above, including summaries, review-priority tags, and notes generated by the AI-assisted tools described in Section 2.
- **Sensitive personal data:** Certain information may be treated as sensitive personal data under privacy laws and may be subject to heightened rights and protections. These may include: your citizenship, immigration or visa status; equal opportunity information you volunteer in the United States; government identification numbers and documents and background check results (including any criminal record information) collected after an offer; and health or disability information you share with us in order to request an accommodation. We collect sensitive personal data only where necessary, and only use or disclose it for the purposes described in this Notice and permitted by law.
- **Other information you voluntarily provide throughout the process:** We ask that you do not include sensitive personal data in your resume or application unless we request it.

2. How we use personal data

Rokt will use your personal data collected in the job recruitment context to:

- Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available at Rokt;

- Communicate with you about your application, schedule interviews and assessments, and respond to your questions;
- Perform administrative functions (e.g., reimburse you for interview-related expenses, verify your right to work, and complete pre-employment checks if you are offered a role);
- Perform analysis of our applicant pool to better understand who is applying to positions at Rokt and how to attract top talent, using aggregated or de-identified data where possible;
- Keep your profile in our applicant tracking system so that we can contact you about future roles that may suit you, as described in Section 7. You can ask us to stop at any time by emailing privacy@rokt.com;
- Evaluate and improve the recruiting and hiring process;
- Verify your identity in relation to any requests you make under this Notice;
- Perform any legally required reporting (including equal opportunity reporting in the United States), and respond to legal process; and
- Fulfill any other lawful purpose for which we have your consent or provide you with advance notice.

AI-assisted and automated tools. We use technology and AI to help our Talent team work efficiently, and we want you to understand how it is used:

- Our applicant tracking system, Workable, parses your CV and application to populate your candidate profile. Workable may use AI services to perform this parsing.
- We use an AI-assisted tool to help our recruiters organize and prioritize their review of applications. It does not reject, rate or rank candidates, send you messages, or use or infer characteristics such as age, gender, race, ethnicity, national origin, religion, disability or family status. Recruiters review applications and decide who progresses; we do not make hiring decisions based solely on automated processing.
- Skills and aptitude assessments are scored by the assessment provider; the score is one of several inputs considered by our recruiters and hiring managers.
- Where we record interviews, the recording may be transcribed and summarized automatically to support interviewer notes.

Where the GDPR, UK GDPR or similar laws apply, we process your personal data: (i) to take steps at your request before entering into an employment contract with you; (ii) where processing is necessary for our legitimate interests in recruiting and assessing candidates, protecting our business and improving our hiring process, and those interests are not overridden by your rights; (iii) to comply with our legal obligations (for example, right-to-work checks and equal opportunity reporting); and (iv) in limited cases, with your consent (for example, to keep your profile for future roles for longer than our standard period, or where local law requires consent for a background check or interview recording). You may withdraw consent at any time. We process special categories of personal data (for example, health information you share with us to request an accommodation) only where permitted by law, such as to comply with employment law obligations, with your explicit consent, or to establish, exercise or defend legal claims.

3. When and how we collect personal data

We collect personal data from and about job applicants in various ways, including:

- **Directly from you:** We receive certain personal data directly from you, such as when you submit an application through our careers site or a job board, interview with us, complete an assessment, or otherwise communicate with us.
- **Automated technologies and tracking tools:** We use a variety of tracking tools and technologies that can automatically collect information about your activity on Rokt's websites, digital platforms, or emails we send you.
- **Internally generated records:** We generate certain records of personal data internally, such as when we make notes with our impressions during an interview with you, or when the tools described in Section 2 generate summaries or review-priority tags.
- **From affiliated companies:** We may get certain personal data about you from other Rokt entities if you applied for a job with another Rokt entity or were referred by a Rokt employee.
- **Service providers and other businesses:** We get personal data about you from other sources such as job references, staffing or search agencies, assessment and interview providers, background check providers, and/or our vendors and service providers.
- **Publicly available sources:** We may get personal data about you from professional networking sites (such as LinkedIn), job boards, public profiles, and other public online sources.

4. We disclose some personal data to others

We may disclose personal data of job applicants under the following circumstances:

- **Internally within Rokt:** On a need-to-know basis, personnel within Rokt will have access to relevant personal data about you in order to review your application and assess your suitability for a job at Rokt.
- **With Rokt affiliates and subsidiaries:** We may share your personal data with our affiliates and subsidiaries listed in Section 12, for instance when we think you might be a good fit for a job with another Rokt entity.
- **With service providers:** We may share your personal data with vendors who perform functions on our behalf under contracts that restrict their use of your data, including: our applicant tracking system and careers site; assessment providers; interview scheduling, recording and transcription providers; background screening providers; AI model providers used by Rokt under enterprise agreements that prohibit training on your data; cloud hosting, productivity and security providers; and travel and expense providers.
- **Business transfers:** If Rokt or a part of our business is involved in a merger, acquisition, financing, reorganization or sale of assets, personal data may be disclosed to the parties involved, subject to confidentiality obligations and this Notice.
- **For legal compliance:** We may disclose your personal data to outside parties to comply with a legal obligation, law enforcement request, or court order; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of other applicants, employees, customers, visitors, or members of the public.
- **Other disclosures:** We may disclose your personal data for other reasons that we describe to you from time to time as permitted by law, or with your consent.

- **Non-personal data:** We may disclose information that has been de-identified or aggregated (such that it does not identify or relate to you) with other parties for any purpose. This may include aggregated demographic statistics about our job applicants, for instance.

5. Your Privacy Rights

If provided for by local privacy law, and depending on where you are located, you may make some or all of the following requests with regard to your personal data that Rokt collects about you in the context of job recruiting, interviewing, and hiring:

- **Access / Portability / Right to Know:** You may have the right to request the following specific disclosures regarding the personal data we have collected about you:
  - A portable copy of the specific pieces of personal data we have collected about you;
  - A list of categories of personal data we have collected about you;
  - A list of categories of sources from which such personal data was collected;
  - A list of categories of personal data that we disclosed for a business purpose about you;
  - A list of categories of third parties to whom the personal data was disclosed for a business purpose;
  - The business or commercial purpose for collecting your personal data; and/or
  - Information about the logic involved in any automated decision-making processes used by Rokt (if applicable), as well as a description of the likely outcome of the process with respect to you.
- **Deletion / Erasure:** Upon your verified request, and subject to important exceptions, we will delete the personal data we have collected about you. This deletion right will not apply in situations where applicable law authorizes or requires us to retain specific elements of personal data.
- **Correct or update your personal data:** You may have the right to request that we correct, update, or modify the personal data we maintain about you, so that our internal records are accurate and current. We have the right to confirm the validity and accuracy of your requested changes, and we have our own legal obligations to maintain records that are accurate to the best of our knowledge.
- **Sales and sharing of personal data for behavioral advertising:** We do not “sell” or “share” your personal data (as those terms are defined under applicable privacy laws) that we collect or receive in the context of job recruiting, interviewing, and hiring.
- **Object to processing:** You may be able to object to the processing of your personal data, where we carry out such processing on the grounds of our legitimate interests.
- **Restrict processing:** You may be able to ask us to restrict processing of your personal data or block the further use of your personal data. When processing is restricted, we can still store and retain your personal data.
- **Refuse or withdraw consent:** If we have collected and processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it

affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

- **Sensitive personal data:** In reference to the sensitive personal data identified in Section 1 above, where allowed by applicable laws, you may be able to request that we limit our use and disclosure of such information only for those purposes specified under applicable privacy laws.
- **Automated decision-making:** As described in Section 2, we do not make hiring decisions based solely on automated processing. Where local law provides, you may request human review of, express your point of view on, and where applicable, opt out of automated decision-making technology.

To submit a privacy request relating to your recruitment-related personal data, please email privacy@rokt.com or contact the Rokt entity listed in Section 12. You will not be discriminated against for exercising these rights.

You have the right to complain to a data protection authority about our collection and use of your personal data, including if you are not satisfied with our response to your privacy requests. For more information, please contact your local data protection authority.

We will take reasonable steps to verify your identity prior to responding to your requests. The verification steps will vary depending on the sensitivity of the personal data and the type of request.

You may designate an authorized agent to make a request on your behalf by following the same steps described above. When submitting the request, please ensure the authorized agent identifies themselves as your authorized agent.

6. Additional Privacy Disclosures for California Residents

For purposes of California privacy law (the CCPA/CPRA), California residents should note the following additional information when it comes to our processing of recruitment-related personal data. This section, together with Sections 1, 2 and 7, is our notice at collection for California job applicants:

- **Categories of personal data collected.** We may collect the following categories of personal data, as more fully described in Section 1 above:
  - Identifiers (including your name, email address, phone number, internet protocol (IP) address, and, after an offer, government identification numbers);
  - Personal data as defined in Cal. Civ. Code § 1798.80(e), such as your name, contact information, education, and employment history;
  - Characteristics of protected classifications, such as citizenship or immigration status, and gender, race/ethnicity, veteran status and disability status that you choose to provide for equal opportunity reporting;
  - Commercial information, such as which job(s) you apply for, and any expense reimbursement information you submit in relation to the application and interviewing process;
  - Internet or other electronic network activity information, such as browsing history and device data when visiting our job application websites or interacting with our recruiting emails;

  - Audio or visual information, such as interview recordings where you have been notified;
  - Professional or employment-related information, such as work history, professional experience, assessment results, and professional certifications;
  - Education information, such as your educational institutions attended, and degrees and certifications received;
  - Sensitive personal data, as disclosed in Section 1 above; and
  - Inferences about you drawn from the above categories of personal data, including the review-priority tags described in Section 2.
- **Purpose for processing your personal data.** We use the above categories of personal data (including sensitive personal data) for the purposes described in Section 2 above.
- **Retention.** We retain each category of personal data for the periods, or according to the criteria, described in Section 7.
- **Categories of sources of personal data.** We collect the above categories of personal data (including sensitive personal data) from the following categories of sources, as more fully described in Section 3 above:
  - Directly from you;
  - Automatically from your devices;
  - From our service providers (including assessment, interview and background check providers);
  - From your professional networking profiles and activity;
  - From our business partners, such as staffing agencies;
  - From internally generated sources, such as records, notes, and evaluations created by Rokt personnel and the tools described in Section 2 when evaluating your job application;
  - From publicly available sources, such as professional networking sites, job boards, public profiles, credentialing and licensing organizations; and
  - From our corporate affiliates, subsidiaries, and/or parents.
- **Categories of recipients to whom we disclose personal data.** We may disclose your personal data (including sensitive personal data) to the following categories of third parties, as more fully described in Section 4 above:
  - Rokt affiliates and subsidiaries;
  - Service providers (such as companies that host or operate our networks, provide our applicant tracking system, assessments, interview tools, background checks and AI models, analyze data, and/or provide legal, accounting, auditing, or other professional services);
  - Law enforcement or as required by legal obligations or court orders; and
  - Third parties to whom you or your agents authorize us to disclose your personal data.

- **“Sales” and “Sharing”.** We do not “sell” or “share” recruitment-related personal data, and we do not knowingly “sell” or “share” the personal data of individuals under 16 years of age.
- **Sensitive personal data.** We do not use or disclose sensitive personal data for purposes other than those specified under Section 7027(m) of the applicable California privacy regulations, and therefore do not offer a separate “Limit the Use of My Sensitive Personal Information” option.
- **Automated decisionmaking technology.** We do not currently use automated decisionmaking technology to make significant decisions about California job applicants; the tools described in Section 2 assist human reviewers who make every decision.

7. Retention of Personal Data

Rokt retains your personal data for the period reasonably necessary to fulfill the recruitment purposes described in this Notice. The applicable retention period is determined by the nature of the personal data, the purposes for which it is processed, and relevant legal and regulatory requirements.

Following the conclusion of the recruitment process, including where your application is unsuccessful, you withdraw your application, or you decline an offer, Rokt may retain relevant personal data to comply with recordkeeping obligations, respond to inquiries or complaints, establish, exercise or defend legal claims, and assess and improve its recruitment practices.

Where permitted by applicable law, Rokt may also retain your candidate profile to assess your suitability for other employment opportunities. You may request that your personal data no longer be used to consider you for future opportunities, or request correction or deletion of your personal data by contacting privacy@rokt.com. Such requests remain subject to any applicable legal requirements or other lawful grounds for retaining the relevant records.

If you are employed by Rokt, relevant recruitment records will become part of your employee file and will be retained in accordance with Rokt’s Privacy Statement for Personnel.

8. International Transfers

Rokt is a global business, so the personal data you provide may be stored, accessed and processed outside the country or region where it was collected. This includes the United States, where our applicant tracking system and several of our other service providers are based, and the other countries where our group companies and Talent team members are located (including the United Kingdom, Australia, Japan, Singapore and Canada).

For job applicants whose personal data is subject to the EU General Data Protection Regulation or UK General Data Protection Regulation, please note that Rokt relies on the European Commission’s Standard Contractual Clauses with the UK International Data Transfer Addendum where relevant, or adequacy decisions such as the EU-U.S. Data Privacy Framework where a recipient is certified, to transfer personal data from the European Economic Area and United Kingdom to locations throughout the world, including to the United States. The standard of data protection in these jurisdictions may not be as protective as in the EEA or UK. Further, Rokt and its subsidiaries need to rely on services provided by third parties in order to manage the job applicant relationship, which third parties can be based anywhere in the world. In the event that personal data is provided to a foreign subsidiary or an outsourced third party, Rokt will remain the data controller, will enter into a processing

agreement with the third-party processor, and will contractually require an adequate level of security and privacy controls before transferring the personal data.

For applicants in Australia, we may disclose your personal information to overseas recipients in the countries listed above, and we take reasonable steps to ensure they handle it in accordance with the Australian Privacy Principles. For applicants in Japan, see Section 13 for information about transfers to third parties located outside Japan and joint use within the Rokt group.

9. Security

Rokt implements commercially reasonable security safeguards and utilizes industry-standard physical and procedural security controls designed to protect personal data. This includes, but is not limited to, firewalls, access controls, system level security, data protection training and other procedures designed to protect information from unauthorized access. However, no method of online or hard copy transmission or storage of personal data is 100% secure, and we cannot guarantee or warrant that your personal data will always be free from unauthorized access, acquisition, or deletion.

10. Notice Changes

Rokt may from time to time revise this Notice to reflect changes in our business practices or new disclosure requirements under applicable privacy laws. If we revise this Notice, we will post the updated version with a new “Last Updated” date, and where changes are material and you have an active application, we will notify you.

11. Contact Us

If you have any questions or concerns about this Notice, the privacy practices of Rokt, our collection or use of your personal data, or you wish to exercise privacy rights with respect to your personal data, please contact us at privacy@rokt.com.

12. Rokt entities responsible for your personal data

The Rokt entity recruiting for a role is the controller for that recruitment process:

- Roles based in the United States: Rokt US Corp., 175 Varick Street, Level 10, New York, NY 10014, United States.
- Roles based in the United Kingdom: Rokt (UK) Limited, c/o PKF Littlejohn, 30 Churchill Place, London E14 5RE, United Kingdom.
- Roles based in Australia and New Zealand: Rokt Pty Limited, Level 16, 300 Elizabeth Street, Surry Hills NSW 2010, Australia.
- Roles based in Japan: Rokt GK, 16th Floor, Ark Hills South Tower, 1-4-5 Roppongi, Minato-ku, Tokyo 106-0032, Japan.
- Roles based in Singapore: Rokt Pte Ltd, c/o Dentons Rodyk & Davidson LLP, 80 Raffles Place, #32-01 UOB Plaza 1, Singapore 048624.
- Roles based in Canada: Beam Commerce Inc., c/o DLA Piper, Suite 2700, 1133 Melville Street, Vancouver, BC V6E 4E5, Canada.

13. Additional information for specific countries

United Kingdom and European Economic Area. Sections 2 and 5 describe our legal bases and your rights under the UK GDPR and GDPR, including the right to lodge a complaint with the ICO or your local supervisory authority. We do not make decisions about you based solely on automated processing that produce legal or similarly significant effects. If that changes, you will be told in advance and will be able to request human intervention, express your point of view and contest the decision, as required by Articles 22A to 22D of the UK GDPR and Article 22 of the GDPR.

Australia. Rokt Pty Limited collects your personal information for the purposes in Section 2; if you do not provide it, we may be unable to consider your application. We may disclose it to overseas recipients as described in Section 8. Our privacy policy describes the kinds of personal information used, and the decisions made, by the automated tools described in Section 2. You may access or correct your personal information, or complain, by contacting privacy@rokt.com.

Japan. Rokt GK handles your personal information for the purposes of use in Section 2 in accordance with the Act on the Protection of Personal Information. Your personal data may be jointly used by the Rokt group entities listed in Section 12 for recruiting, people and IT administration purposes; the items jointly used are those described in Section 1, and Rokt GK is responsible for managing the jointly used data. Where we provide your personal data to third parties outside Japan (including service providers in the United States such as Workable), we do so with your consent, after informing you of the destination country and the recipient's data protection measures, or under contractual safeguards that meet the standards of the Personal Information Protection Commission. You may request disclosure, correction, cessation of use or deletion of your personal data by contacting privacy@rokt.com.

Singapore. Rokt Pte Ltd collects, uses and discloses your personal data for the purposes in Section 2 under the Personal Data Protection Act 2012. You may withdraw consent, or request access to or correction of your personal data, by contacting privacy@rokt.com.

Canada. Beam Commerce Inc. collects, uses and discloses your personal information for the purposes in Section 2 in accordance with the Personal Information Protection and Electronic Documents Act and applicable provincial privacy laws, including Alberta's Personal Information Protection Act and, for Quebec residents, the Act respecting the protection of personal information in the private sector. Your personal information may be stored and processed by service providers outside Canada, including in the United States, where it may be accessible to authorities under local law; we use contractual and other safeguards to protect it as described in Section 8. You may request access to or correction of your personal information, or ask questions about our privacy practices, by contacting privacy@rokt.com.

United States. Where state law gives you privacy rights in relation to recruitment data, you may exercise them through the methods in Section 5. California residents should refer to Section 6 for additional disclosures required by the CCPA/CPRA, including the categories of personal data we collect and our use of automated decisionmaking technology.