



## Dragos Candidate Privacy Notice

**Last Updated: December 8, 2025**

Dragos is committed to protecting the privacy and security of your personal data. This Dragos Candidate Privacy Notice (“**Candidate Privacy Notice**”) describes how Dragos, Inc. and its subsidiaries and affiliated entities (collectively, “**Dragos**,” “**we**,” or “**us**”) collect and process personal data about you during the application and recruitment process. This Candidate Privacy Notice applies to job applicants only, but supplements and should be read together with the [Dragos Privacy Policy](#).

This Candidate Privacy Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of your home jurisdiction. This Candidate Privacy Notice also describes your rights regarding the personal data that we hold about you and how you can request access to, correction of, object to or restrict processing of, portable copies of, and erasure of your personal data.

We will only process your personal data as described in this Candidate Privacy Notice unless otherwise permitted or required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

Depending on your jurisdiction, there may be certain rights applicable to you for which we may provide separate notice informing you of your rights and how to adequately exercise them.

If you have any questions or concerns about our use of your personal data, please contact us using the contact details provided in the “[How to Contact Us](#)” section of this Candidate Privacy Notice.

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### Collection of Personal Data

Dragos may collect and process the following categories of personal data, which you provide as part of your initial submission or otherwise make available:

- **Identification Data**, such as your name, address, contact details, date and place of birth, citizenship, passport and work authorization documents, Social Security or national insurance number;
- **Experience Data**, such as education and work experience, contact details of your former/current employer, information about your educational background, skills and qualifications, compensation history (to the extent permitted by applicable law), board and advisory roles, and other experience;
- **Data Collected as Part of the Interview Process**, such as notes taken from your interview, results from an assessment tool and/or coding session or as part of other forms of assessment;
- **Background Check Information**, such as information obtained through reference checks, subject to any further permissions or notifications required by applicable law;



- **Medical Information**, such as health information, including disability status, that is relevant to Dragos and the role you are being considered for, in each case, to the extent permitted by applicable law;
- **Information Required to Initiate Employment**, such as proof of eligibility to work in country (like a passport or visa), information you provide in response to an export control questionnaire, tax information, bank account information, benefits eligibility information and other information you provide, including legally required information, for the purposes of starting employment or performing an employment contract; and
- **Other Data You Submit**, such as the information you provide in an application form, information you provide on our website or via a CV/resume, and any additional personal details that you otherwise voluntarily provide to us.

Resumes/CVs should include information relevant to your employment history and education (e.g., degrees obtained, places worked, positions held, relevant awards, etc.). Generally, we recommend that you do not disclose sensitive personal characteristics (e.g., gender, height, weight, religion, philosophical or political beliefs, financial data, age) in your resume/CV or any materials you submit in support of your application. However, for positions in some locations, and subject to applicable law, we may request that you self-identify with certain characteristics, such as gender, race/ethnicity or veteran status. You may choose not to disclose such characteristics and choosing not to disclose will not subject you to any adverse treatment. If you do disclose, this information will be kept confidential and used for reporting and statistical purposes in compliance with applicable law. If you provide information about others (i.e., reference contact details), please first ensure you have informed them that you will be providing their information to Dragos and obtain their consent to do so. Any misleading, false or willful omission of relevant information may be sufficient reason for refusal of employment, or suspension or dismissal from employment. Please submit only accurate information

## Use of Personal Data

We process your personal data for the purpose of processing and evaluating your application for employment and for the purpose of completing the on-boarding/new hire process, should you be offered and accept a position with Dragos. We may use your personal data for a variety of reasons linked to the processing and evaluation of your application as set out below:

- **Recruiting-Related Purposes**, such as processing personal data to identify, screen and interview candidates throughout the recruitment cycle;
- **Administration-Related Purposes**, such as processing your employment application, including your experience and other information that will aid in determining your suitability for the role for which you have applied and results from any assessment tool and/or coding session;
- **Communication-Related Purposes**, such as communicating with you regarding your employment application, interview status or other opportunities that may be of interest to you;
- **Security-Related Purposes**, such as processing personal data for running background checks, including verifying your identification, work experience and other information you submit. For some candidates, a criminal record check will be carried out to the extent permitted by applicable law, relevant and necessary in relation to the specific role for which you apply. You will be notified as to whether a criminal record check will be carried out in the onboarding documentation provided. Employment may be conditional upon the results of this check to the extent permitted by applicable law; and
- **Onboarding-Related Purposes**, such as processing your personal data required to initiate employment, including setting up payroll, setting up withholdings and benefits, providing accommodations or as required to comply with statutory reporting and applicable law.

## Collection and Use of Sensitive Personal Data

The following categories of personal data may be considered sensitive under the laws of your jurisdiction and may receive special protection:

- Race or ethnic origin.



- Political opinions.
- Religious, philosophical, or moral beliefs.
- Trade union membership.
- Social welfare, gender, sexual life, or sexual orientation.
- Physical or mental health or condition.
- Unlawful or objectionable conduct, criminal charges, or convictions.
- Biometric information.
- Genetic data.
- Financial information.

We may collect and process the following categories of sensitive personal data when you voluntarily provide them or we receive them from a third party with your consent, when relevant for a particular position and as permitted by applicable law:

- Physical or mental health or condition or disability status to determine appropriate workplace accommodations and evaluate fitness for a particular position or for the provision of benefits.
- Family and/or marital status and limited health information required to process an employee's request to apply for supplemental health insurance or other optional benefits for the employee and/or related persons.
- Race or ethnic origin to ensure meaningful equal opportunity monitoring and reporting.
- Unlawful or objectionable conduct, criminal charges, or convictions to evaluate fitness for a particular position.

Where we have a legitimate need to process your sensitive personal data for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your consent.

## **Disclosure of Personal Data**

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the application and recruitment process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks. These third-party service providers may be located outside of the country in which you live or the country where the position you have applied for is located.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. We only permit them to process your personal data for specified purposes in accordance with our instructions.

We may also disclose your personal data for the following additional purposes, where permitted or required by applicable law:

- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Candidate Privacy Notice and as necessary to administer the application and recruitment process.
- If we take part in or are involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets through which 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.
- In the event of insolvency, bankruptcy, or receivership.
- As part of our regular reporting activities to other members of our group of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.



- To protect the rights and property of Dragos.
- During emergency situations or where necessary to protect the health and safety of persons.
- Where the personal data is publicly available.
- If a business transfer or change in ownership occurs.
- For additional purposes with your consent where required by law.

We may combine information that we receive from the various sources described in this Candidate Privacy Notice, including third party sources and public sources, and use or disclose it for the purposes set forth herein.

We do not sell or share (as those terms are defined under the California Privacy Rights Act (CPRA)) your personal data to third parties. This means that we do not sell, rent, share, or otherwise disclose your personal data to third parties in exchange for monetary or other valuable consideration.

### **Legal Basis for Processing Personal Data**

If applicable law requires a lawful basis for processing, then Dragos's legal basis for processing your personal data will depend on the personal data concerned and the specific context in which we process it. In most circumstances, we process personal data: (i) to perform our obligations under an agreement we have with you or to take steps prior to entering an employment contract with you, when you are under consideration for employment, (ii) where you provided consent, or (iii) where the processing of the personal data is in our legitimate interest, balancing our interests and rights against the impact of the processing on you. These legitimate interests include, for example, (i) administering an efficient recruitment process and managing applicants effectively, or (ii) to comply with a legal obligation.

### **Security Safeguards**

We adopt data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal data, and we follow generally accepted practices to protect personal data that is processed. For more information on our security measures, please contact us at [privacy@dragos.com](mailto:privacy@dragos.com)

For your own safety, please note that the security of information transmitted through the internet can never be guaranteed. You are responsible for maintaining the security of your password or other form of authentication involved in accessing password-protected or secured areas of any Dragos career portal. Access to and use of password-protected and/or secure areas of any Dragos career portal is restricted to authorized users only.

### **Retention of Personal Data**

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes for which we collected it and will honor your exercise of data subject rights, subject to any limitations or exclusions recognized by applicable law. To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of the personal data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, subject to applicable legal, regulatory, tax, accounting, reporting, or other requirements or when retention is necessary to resolve a pending legal dispute.

In cases where we have no ongoing legitimate business need to process your personal data, we will either delete your personal data or, if this is not possible (e.g., because your personal data has been stored in backup archives), we will securely store your personal data and isolate it further from any further processing until deletion is possible.

If you are offered and accept employment with Dragos, the personal data we collected during the application and recruitment process will become part of your employment record and we may use it in



connection with your employment consistent with our employee personal data use and privacy policies. If you do not become an employee, or, once you are no longer an employee of Dragos, we will retain and securely destroy your personal data in accordance with our retention policy and any applicable laws and regulations.

## **Adherence to Data Protection Laws**

Where not prohibited by applicable law, we may transfer the personal data we collect about you to jurisdictions outside your home country, but in accordance with applicable legal requirements (if any) for the purposes set out in this Candidate Privacy Notice. To the extent required by applicable law, we have implemented data transfer agreements/obtained consent to secure the transfer of your personal data to other jurisdictions outside your home country that may not be deemed to provide the same level of protection as your home country.

If you are based in the UK, Switzerland, or the European Economic Area (EEA), please note that, where necessary, your personal data may be processed by other Dragos entities and service providers outside the UK, Switzerland, and EEA, such as the United States of America. These international transfers of your personal data will be made pursuant to appropriate safeguards, such as standard data protection clauses adopted by the European Commission. If you wish to enquire further about these safeguards used, you may contact us at [privacy@dragos.com](mailto:privacy@dragos.com).

## **Individual Privacy Rights**

Subject to the conditions and restrictions set out under applicable law, you may have the following rights:

- You may request access, correction, or deletion of your personal data.
- You may object to processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data.
- You may have the right to complain to a data protection authority about Dragos's collection and use of your personal data.

If you wish to exercise any of these rights, please contact us at [privacy@dragos.com](mailto:privacy@dragos.com). Depending on the jurisdiction where you are located, some of these rights may not apply. We may request specific information from you to help us confirm your identity, verify your rights, and respond to your request, including to provide you with the personal data that we may hold about you. Please note that applicable law may allow or require us to deny your request or there may be cases where we may have already destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot respond to your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the application and recruitment process.

If you have provided consent to the processing of your personal data, 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 the processing of your personal data conducted in reliance on lawful processing grounds other than consent.

## **Consent**

We are not required to obtain additional consent for most of the processing activities that we undertake in respect of the personal data you have submitted to us. We may, however, seek your consent for some uses of personal data. If we need your consent, we will notify you of the personal data we intend to use and how we intend to use it.

You will never be obligated to provide us with your consent. Where you have provided your consent to the collection, processing, and transfer of your personal data, you may have the legal right to withdraw



your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [privacy@dragos.com](mailto:privacy@dragos.com).

### **Data Protection Officer**

Dragos will appoint a data protection officer where such appointment is required by data protection laws and regulations. The appointed person may be reached at [privacy@dragos.com](mailto:privacy@dragos.com).

### **Changes to this Candidate Privacy Notice**

We reserve the right to update this Candidate Privacy Notice at any time and we will provide you with access to any new Candidate Privacy Notice when we make any material updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law, regulation, or court order.

### **How to Contact Us**

If you have any questions about our processing of your personal data or would like to make an access or other request, please contact us at [privacy@dragos.com](mailto:privacy@dragos.com).