

## SUMMARY OF LATEST CHANGES

This policy was last updated on January 16, 2026, to provide information about how artificial intelligence (AI) tools may be used as part of Mitel's hiring process.

## MITEL PRIVACY POLICY FOR CANDIDATES

Mitel Networks Corporation and its affiliates and subsidiaries (collectively, "Mitel", "we", "our", or "us") are committed to protecting the security and privacy of your personal data and ensuring that we conduct our business in compliance with laws on privacy, data protection, and data security.

This policy applies to Mitel's processing of personal data in conjunction with: (I) applications for employment with Mitel (irrespective of whether the position is (a) full time or part time and (b) "permanent" or on a "temporary" basis) received directly or indirectly by Mitel, and (II) proposals from organizations who have Mitel contract(s) detailing the individual(s) who would perform the services set out in the contract on behalf of the organization (an "assignment"). In this capacity, Mitel determines the purpose for processing the personal data as well as the manner in which it processes the personal data. As such, Mitel is the data controller. This policy does not apply to any other function at Mitel.

Whenever you interact with us on behalf of another individual or entity, such as by providing or accessing personal data about another individual, you need to obtain their consent (or have the legal authority without consent) to share any personal data you provide to us.

We encourage you to read this Policy so that you understand Mitel's commitment to your privacy, and how you can contribute to that commitment.

Our contact details are set out at the end of this Policy.

If you are a CA resident, see Appendix A – California Supplement for a detailing of the categories of personal data we have collected or disclosed and the categories of third parties with whom each category was sold, shared, or disclosed.

## EFFECTIVE DATE

January 16, 2026

## 1 SOURCES OF PERSONAL DATA

We may collect personal data from the following sources:

- from the applicant, including by means of any application submitted either directly or indirectly to Mitel (e.g., via our job portal (which we may outsource) or LinkedIn). Our job portal may use strictly necessary and functional cookies. For additional information, see our [Cookie and Tracking Technology Policy](#);
- inferences we draw during the application or assignment process (e.g., from an interview)
- recruitment agencies;
- third party websites and apps, including LinkedIn and other social media platforms;
- third parties such as, where applicable, those who provide background checks, applicant references, and credit references. For purposes of this policy, background checks include

validating right to work, credentials, employment history, security clearance, criminal records (or lack thereof) and any other information presented as during the application or hiring process; and

- in the case of an assignment, the organization who has won or is bidding on the opportunity and/or their applicant.

## 2 INFORMATION WE COLLECT ABOUT YOU

We may collect the following personal data as part of a Mitel employment (or assignment) application.

- name, title, postal address, telephone number, telephone type, personal email address, gender, employment status, employment history, qualifications, third party websites and publicly accessible social media accounts such LinkedIn and Facebook profiles relevant to you and/or your candidacy;
- desired salary, and in certain jurisdictions, current salary;
- availability to work and, in certain jurisdictions such as India, notice period owed to current employer and whether any such notice period can be bought back;
- right to work status, and whether you require sponsorship for an employment visa;
- other information contained in a CV or resumé and covering letter. PLEASE NOTE THAT APPLICATIONS INCLUDING RESUMES, AND COVER LETTERS SUBMITTED TO MITEL SHOULD NOT CONTAIN SENSITIVE PERSONAL INFORMATION E.G., SOCIAL INSURANCE NUMBER, DRIVER'S LICENSE NUMBER, GOVERNMENT IDENTIFICATION CARD NUMBER, FINANCIAL INFORMATION, HEALTH INFORMATION;
- in certain jurisdictions such the United Kingdom and EMEA, where necessary for a right to work check, passport number, driver's license number and proof of address;
- photographs or security camera footage in public areas of Mitel facilities (including reception, the work floor, conference rooms, parking, and other general areas) if you participate in on-site activities, such as a job fair, job interview or aptitude test;
- video and/or audio recordings, collected in the course of interviews;
- Internet or other electronic network activity information, such as information relating to your use of or interactions with our websites, such as IP address and other log information.
- other information about you disclosed to us during the application process (e.g., obtained during an interview, background check, or reference check);
- where required or permitted by law, equal opportunity and voluntary self-identification information. For example, in certain jurisdictions we may collect gender, race, ethnicity, whether or not you have a disability, and veteran status. Any such collection is done on a voluntary basis unless otherwise required by law;
- any health and disability status information required to provide you with necessary and appropriate accommodation during our application process, for example, where adjustments need to be made during a test or interview;
- where necessary, we may request, use, and store other data from time to time, in support of an application;
- for certain job categories, credit information; and
- in certain instances, we may ask you to provide us a criminal history disclosure.

### 3 HOW WE USE YOUR INFORMATION

We may use personal data we collect to:

- assess skills, qualifications, and suitability for the position which was applied for (or other potential positions);
- carry out background, credit, and reference checks. Background and credit checks are only performed once an offer is extended and accepted to satisfy the conditions found in the offer;
- communicate about the recruitment process or about a different job we think you may be interested in;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

We do not use sensitive personal information to make inferences.

### 4 SUMMARY OF LEGAL BASIS AND PURPOSE OF PROCESSING

Data protection laws (including the EU and UK GDPR) set out a number of different reasons for which we may collect and process your personal data in certain circumstances. Personal data included in applications and proposals covered under this policy is processed based on our legitimate interest and, in some instances, consent.

### 5 WHO WE GIVE YOUR INFORMATION TO

We may disclose personal data to members of our Human Resources Team, the relevant hiring managers and others involved in the hiring process in respect to the role for which a candidate has applied in order to make hiring decisions. We limit access to personal data to people who have a business need-to-know and those people are only permitted to process personal data according to our instructions, and within the conditions of this Privacy Policy for Candidates.

Additionally, we may disclose personal data to the following types of third parties:

- Affiliates and subsidiaries, including parent entities, corporate affiliates, subsidiaries, business units, and other companies that share common ownership with us.
- Professional consultants, such as lawyers and accountants.
- Recruiting agencies.
- External agencies who conduct background checks, credit checks, obtain references and/or perform drug screening for us
- Regulatory bodies, government departments and agencies, workplace relations commissions, and courts and court-appointed persons to whom we are obliged or required by law to disclose information; and
- Other third parties necessary to support the application process such as the software service providers who provide us with our CRM system and application portal.

We take commercially reasonable efforts to ensure third parties take appropriate security measures to protect personal data in line with our policies. We only permit them to process personal data for specified purposes and in accordance with our instructions.

## 6 WHERE YOUR INFORMATION IS STORED

Personal data collected by us may be stored and processed in an applicant's region or in any other country where Mitel or its affiliates, subsidiaries or service providers operate.

In respect of EU or UK citizens, personal data that we process may be transferred and stored at, a destination outside the EEA or UK (as applicable) that may not be subject to equivalent data protection law.

We may transfer your personal data outside the EEA or UK:

- in order to store it;
- where we are legally required to do so; and
- to facilitate the operation of our group of businesses, where it is in our legitimate interest, and we have concluded these are not overridden by candidate rights.

Where applicant information is transferred outside the EEA or UK (as applicable), we take appropriate technical and organizational measures to ensure that data is subject to appropriate safeguards such as, where applicable, relying on a recognized legal adequacy mechanism and contracts, to help ensure candidate rights and protections travel with data and that personal data is treated securely and in accordance with this Policy. Please reach out to us using the contact information in Section 10 below if you want to receive further information about how we transfer Personal Data or, where available, a copy of the relevant data transfer mechanism.

## 7 HOW WE PROTECT YOUR INFORMATION

Mitel implements reasonable security measures. Unfortunately, the transmission of information via the internet is not completely secure. We will do our best to protect your personal data, but we cannot guarantee the security of your data transmitted to our sites; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorized access.

Where we have given you (or where you have chosen) a password which enables you to access our sites such as our job portal, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## 8 USE OF ARTIFICIAL INTELLIGENCE

We may use automated tools, including third party artificial intelligence (AI) tools, to assist with the screening and initial evaluation of résumés, CVs, and other application materials submitted to us. These tools may analyze information such as work history, education, skills, and keywords to help identify suitable matches for a job opening and improve the efficiency and consistency of our hiring process. AI tools are used as a support mechanism only and do not make final hiring or selection decisions without human involvement.

## 9 AUTOMATED DECISION-MAKING

Mitel does not operate an automated decision-making process for final hiring or candidate selection.

## 10 YOUR RIGHTS

You, or a verifiably authorized person acting on your behalf, have the right under certain circumstances to be provided with a copy of your personal data held by us.

Depending upon the data protection law applicable to you, you may have the following rights in certain circumstances. These rights may be exercised directly by you or indirectly via your authorized person:

- to request confirmation that we process your personal data and the specific pieces of information we process. You may also have the right to request information about the categories of Personal Data we have collected about you, the categories of sources from which we collected the Personal Data, the purposes for collecting, selling, or sharing the Personal Data, and to whom we have disclosed Personal Data and why;
- to be provided with a copy of your personal data held (or disclosed) by us;
- to request the rectification or erasure of your personal data held by us;
- to request that we restrict the processing of your personal data (for example, while we verify or investigate your concerns about your information);
- to object to the further processing of your personal data;
- to request that your personal data be moved to a third party;
- except where permitted by law, to not be discriminated against.

## 11 HOW TO EXERCISE YOUR RIGHTS

You (or your agent) can exercise the rights listed above at any time by contacting our Data Protection Department by emailing [privacy\\_request@mitel.com](mailto:privacy_request@mitel.com), completing the request form at <https://www.mitel.com/data-subject-request-form> or where permissible at law, calling at 888-257-8624.

In order to process your requests, we may need to obtain information to locate you in our records and verify your identity. We will generally request some or all of the following information -

- Email Address
- Full Name
- Phone Number
- Mailing Address

Additionally, depending on the sensitivity of your request, we may ask for additional information to verify your identity.

Mitel will retain any such verification for a period of time which we determine reasonably necessary. It may be necessary for Mitel to contact you to accomplish the verification of identity and authority, if applicable.

Under the California Consumer Privacy Act (“CCPA”), for a request to know specific pieces of personal information collected about you, we may request a signed declaration affirming that you are the person whom the information request is about.

You may have your Authorized agents exercise rights on your behalf by submitting a request via email/telephone number and indicating that they are submitting the request as your agent.

We may require the agent to demonstrate authority to act on your behalf by providing signed permission from you. Where an authorized agent is used, we may also require you to verify your own identity directly with us or to directly confirm with us that you provided the authorized agent permission to submit the request. Mitel will retain any such proof for a period of time which we determine reasonably necessary.

If you have any further questions, comments or concerns about our privacy policies or practices, please contact our Data Protection Department at [privacy\\_request@mitel.com](mailto:privacy_request@mitel.com). Mitel is committed to resolving any concerns you may have regarding this Policy quickly and efficiently.

If you are a UK or EU citizen, and if your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority (see [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.html](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html)). The Information Commissioner is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

## 12 HOW LONG WILL MITEL RETAIN YOUR INFORMATION?

### 1.1 Successful Applicants

Where applications for employment or assignment are successful, personal data gathered during the process will remain in our HR management system and will be retained during employment (and after) in accordance with our privacy and retention policies.

### 1.2 Unsuccessful Applicants

Where applications for employment or engagement are unsuccessful, we may hold an applicant's personal data such as contact information, resume, interview notes, cover letter, work samples for up to twelve (12) months after the end of the relevant recruitment process to the extent necessary to enable Mitel to potentially consider the applicant for other roles within Mitel for which the applicant may be suitable. Subject to any applicable legal or regulatory obligations to retain such information which Mitel may have, or any need to retain to exercise or defend a legal claim(s), Mitel will delete candidate information after twelve (12) months.

In accordance with your rights under Section 9 if you do not want us to keep your data on file for up to twelve (12) months, or if at any time, you want us to delete your application and all related information about you, you can let us know at any time in accordance with SECTION 11 - HOW TO EXERCISE YOUR RIGHTS and subject to any applicable legal or regulatory obligations to retain such information which Mitel may have, we will securely destroy your personal data within a reasonable amount of time. Please be aware that if any court actions or other legal proceedings are pending, or anticipated, personal data will not be deleted until termination of the court action or legal proceeding, as appropriate

## 13 CHANGES TO THIS POLICY

Any changes we make to this Policy in the future will be posted on our websites and all related websites for additional languages and regions.

This Policy was last updated on: **January 16,2026.**

## 14 Contact us

Mitel Data Protection Department  
[privacy\\_request@mitel.com](mailto:privacy_request@mitel.com)

### Appendix A – California Supplement

Category of Personal Data We May Collect	Examples	Categories of Third Parties to Whom We May Disclose Personal Data for a Business Purpose	Categories of Third Parties to Whom We Sell or Share Personal Data
A. Identifiers	<ul style="list-style-type: none"> <li>First And Last Name</li> <li>Postal Address</li> <li>Email Address</li> <li>Address</li> <li>Telephone Number(s)</li> <li>Social Media Account</li> <li>Other Contact Details</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates and subsidiaries,</li> <li>Professional consultants</li> <li>Recruiting agencies.</li> <li>External agencies (e.g., background checks providers)</li> <li>Regulatory bodies and relevant government departments or agencies</li> <li>Third party service providers (such as our CRM system and application portal)</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<ul style="list-style-type: none"> <li>Name</li> <li>Signature</li> <li>Credit Information</li> <li>Criminal Record</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates and subsidiaries,</li> <li>Professional consultants</li> <li>Recruiting agencies.</li> <li>External agencies (e.g., background checks providers)</li> <li>Regulatory bodies and relevant government departments or agencies</li> <li>Third party service providers (such as our CRM system and application portal)</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
C. Protected classification characteristics under California or Federal law	<ul style="list-style-type: none"> <li>Race</li> <li>Disability Status</li> <li>Gender</li> <li>Veteran status</li> <li>Marital status</li> <li>Age</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates and subsidiaries,</li> <li>Professional consultants</li> <li>Recruiting agencies.</li> <li>External agencies (e.g., background checks providers)</li> <li>Regulatory bodies and relevant government departments or agencies</li> <li>Third party service providers (such as our CRM system and application portal)</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
D. Commercial Information	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
E. Biometric information	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>

F. Internet or other electronic network history	<ul style="list-style-type: none"> <li>IP address</li> <li>Search history</li> <li>Browsing history</li> <li>Operating system</li> <li>Other log data and data about the device you use to interact with us online</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates and subsidiaries,</li> <li>Professional consultants</li> <li>Recruiting agencies.</li> <li>External agencies (e.g., background checks providers)</li> <li>Regulatory bodies and relevant government departments or agencies</li> <li>Third party service providers (such as our CRM system and application portal)</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
G. Geolocation data.	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
H. Audio, visual, or similar sensory information	<ul style="list-style-type: none"> <li>Photographs or security camera footage in public areas of Mitel's facilities (including reception, the work floor, conference rooms, parking, and other general areas)</li> <li>Video and/or audio recording collected in the course of interviews</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates and subsidiaries,</li> <li>Professional consultants</li> <li>External agencies (e.g., background checks providers)</li> <li>Regulatory bodies and relevant government departments or agencies</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
I. Professional or employment-related information	<ul style="list-style-type: none"> <li>Job Title or Role and Department</li> <li>Education History</li> <li>Employment History</li> <li>Resume or curriculum vitae information,</li> <li>Certifications, qualifications, membership in professional bodies,</li> <li>Job preferences (including willingness to relocate or travel),</li> <li>Documentation required under immigration and employment laws (such as citizenship, visa data, details of residency, and work permit information)</li> <li>Information about you generated during or after interviews and related activities, such as tests or satisfaction surveys</li> <li>Professional qualifications</li> <li>Academic certificates and licenses</li> <li>Languages spoken, and</li> <li>Other relevant skills.</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates and subsidiaries,</li> <li>Professional consultants</li> <li>Recruiting agencies.</li> <li>External agencies (e.g., background checks providers)</li> <li>Regulatory bodies and relevant government departments or agencies</li> <li>Third party service providers (such as our CRM system and application portal)</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	<ul style="list-style-type: none"> <li>• Education Records</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries,</li> <li>• Professional consultants</li> <li>• Recruiting agencies.</li> <li>• External agencies (e.g., background checks providers)</li> <li>• Regulatory bodies and relevant government departments or agencies</li> <li>• Third party service providers (such as our CRM system and application portal)</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
K. Inferences drawn from other personal information	<ul style="list-style-type: none"> <li>• Interviewer's inferences about candidates in interview</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Professional consultants</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
L. Sensitive personal information	<ul style="list-style-type: none"> <li>• Race</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries,</li> <li>• Professional consultants</li> <li>• Recruiting agencies.</li> <li>• External agencies (e.g., background checks providers)</li> <li>• Regulatory bodies and relevant government departments or agencies</li> <li>• Third party service providers (such as our CRM system and application portal)</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>

Mitel does not sell personal data collected from applicants.