

**EFFECTIVE DATE: January 24, 2018**

## **Raytheon Careers Privacy Policy**

This Careers Privacy Policy (the “Policy”) governs how Raytheon Company and its subsidiaries (singularly and collectively, “Raytheon,” “we,” or “us”) collect, use, and protect personally identifiable information provided to us in connection with applications for employment at Raytheon (“Applicant Information”).

Please review this Policy before applying to any job posted on Raytheon’s Careers website (the “Site”). By providing us with your Applicant Information, you confirm that you consent to the processing of your Applicant Information in accordance with the terms of this Policy to the fullest extent allowed by law. This Policy does not form part of any contract of employment offered to applicants hired by Raytheon.

### **1. Definitions**

1.1 ***Applicant Information*** is personally identifiable information provided to us in connection with applications for employment. Raytheon may collect Applicant Information directly from a job applicant or from third parties in connection with, for example, a background or reference check, subject to your consent where required by law. Applicant Information includes, but is not limited to, names, telephone numbers, social security number, addresses, email addresses, education history, job experience and history, criminal history (where permitted by law), and other information you voluntarily provide through, for example, cover letters and resumes.

1.2 ***Sensitive Applicant Information*** is Applicant Information concerning nationality or citizenship, race or ethnic origin, criminal history, or trade union membership. We do not request or consider information concerning religion, sex life or political opinions in connection with recruiting.

1.3 ***Processing*** refers to the handling of Applicant Information, such as collecting, recording, organizing, storing, transferring, using, disclosing, or deleting.

### **2. Collection and Processing of Applicant Information**

2.1 Raytheon processes Applicant Information for legitimate human resources and business management purposes, including processing and evaluating candidates for careers at Raytheon; record-keeping related to hiring processes; conducting analyses of hiring; and conducting background checks, where permitted by law. In addition, we may use Applicant Information for regulatory and corporate governance requirements, and may disclose Applicant Information where permitted or required by law. If you are hired, we may use your Applicant Information in connection with your employment consistent with Raytheon’s employment data policies.

2.2 Raytheon may also retain and use your Applicant Information to consider you for positions other than that to which you have applied. If you do not want to be considered for other positions or would like us to delete your Applicant Information, you may contact us as specified in Section 4.3, Inquiries, Complaints and Objections. For jurisdictions other than the United States, unless

required for legal purposes or in connection with your employment as specified above, we will retain Applicant Information for a maximum of three years (or less where required by law).

2.3 Raytheon processes Sensitive Applicant Information only where it is necessary and proportional in light of the requirements of the position at issue and is allowed by the applicable law. For instance, in some jurisdictions, information about the race of applicants must be maintained in order to ensure documentation of equal employment opportunities.

### **3. Disclosure of Applicant Information**

3.1 Raytheon may share your Applicant Information with third parties that perform services on our behalf. Such third-party service providers have access to Applicant Information solely for the purposes of performing the services specified in the applicable service contract, and we require that providers undertake security measures consistent with the protections specified in this Policy.

3.2 Raytheon reserves the right to transfer your Applicant Information in connection with the sale or acquisition of one or more of our businesses or subsidiaries to a different company that agrees to offer equivalent safeguards for the use and disclosure of such information.

3.3 We will not disclose your Applicant Information without your consent other than as described in this Policy except (1) where such disclosure required by law; (2) to protect Raytheon's legal rights to the extent authorized or permitted by law; or (3) in an emergency where the health or safety of you or another individual may be endangered.

### **4. Rights of Applicants**

#### **4.1 Access, Correction and Deletion**

Raytheon will provide you with reasonable and appropriate access to your Applicant Information that we hold to the extent required by law in your home country, regardless of where we process such information. You may request correction or deletion of your Applicant Information, except where retention is required by your contractual relationship with Raytheon, in the context of a legal dispute, or as otherwise required by law. If we deny your request for access, correction or deletion, we will communicate the reason for the denial to you.

#### **4.2 Automated Decisions**

Raytheon does not make recruiting or hiring decisions based solely on automated decision-making within the meaning of the EU General Data Protection Regulation.

#### **4.3 Inquiries, Complaints and Objections**

If you wish to withdraw your consent to the processing of your Applicant Information or submit inquiries, complaints and/or objections to such processing, please send a request in writing to: [PrivacyPolicy@Raytheon.com](mailto:PrivacyPolicy@Raytheon.com) or:

Chief Ethics and Compliance Officer  
RAYTHEON COMPANY  
Waltham Woods  
870 Winter Street  
Waltham, MA 02451-1449

The processes described in this Policy supplement any other remedies and dispute resolution processes provided by Raytheon and/or those available under applicable law.

## **5. Direct Marketing**

5.1 Raytheon will not use Applicant Information to market products or services to you or provide Applicant Information to third parties for direct marketing purposes. These restrictions do not apply to contact or other personal data obtained in the context of a customer, consumer or other non-employment relationship with Raytheon.

## **6. EU-U.S. Privacy Shield Framework**

6.1 Raytheon in the United States ("Raytheon US") participates in the EU-U.S. Privacy Shield Framework (the "Framework") for Applicant Information received in the U.S. from the European Union ("EU") ("EU Applicant Information"). We are committed to subjecting such EU Applicant Information to the Framework to the extent that we have received it in reliance on the Framework, including its Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. To learn more about the Framework, visit the U.S. Department of Commerce's Privacy Shield List [here](#).

### **6.2 EU Applicant Information Collection, Use, and Disclosure**

Raytheon US collects, receives, and processes the following categories of EU Applicant Information: names, telephone numbers, social security number, addresses, email addresses, education history, job experience and history, criminal history (where permitted by law), and other information you voluntarily provide about your skills and interests through, for example, cover letters and resumes. Raytheon US will use and otherwise process EU Applicant Information in the United States for the following purposes: processing and evaluating candidates for careers at Raytheon; record-keeping related to hiring processes; conducting analyses of hiring; and conducting background checks, where permitted by law, and exercising a right or obligation imposed by law or contract (e.g., mandatory reporting obligations), and data hosting. Raytheon US transfers EU Applicant Information to the following types of third parties: job application management providers, employee onboarding providers, document management systems providers, and human resources information systems providers.

### **6.3 Rights of EU Applicants**

If you are an EU applicant, you have the right to access your own EU Applicant Information subject to certain limitations, such as where the legitimate rights of other persons would be

infringed or where the burden or expense of providing access would be disproportionate. If you wish to exercise such rights, please contact us as described above in Section 4.

#### 6.4 Choices of EU Applicants

We do not otherwise use or disclose EU Applicant Information in a manner that is subject to choice requirements under the Framework. Raytheon US will exercise appropriate due diligence in the selection of such third party service providers, and require that such third party service providers maintain reasonable precautions to protect EU Applicant Information, and otherwise process EU Applicant Information only as instructed by the Company and for no other purposes. Company intends to use EU Applicant Information for the purposes for which such information was originally collected and does not otherwise use or disclose EU Applicant Information in a manner that is subject to choice requirements under the Framework, except as follows. Raytheon US discloses limited EU Applicant Information to background check providers where permitted by applicable law and only with your express consent.

#### 6.5 Recourse, Enforcement, and Liability

Please contact us as specified below if you have any questions, need access to your EU Applicant Information, or otherwise need assistance. We remain responsible for our collection, use and disclosure of EU Applicant Information in accordance with the Framework. We also are responsible for third party agents that are processing such data on our behalf, unless we prove that we are not responsible for the event giving rise to the damage. In certain situations, we may be required to disclose EU Applicant Information in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

If you have an unresolved concern about EU Applicant Information that we have not addressed satisfactorily, we have committed to cooperate with the panel established by the EU Data Protection Authorities to serve as our independent dispute resolution body for the Framework. We are also subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to the Framework. In addition, under certain conditions, more fully described on the Privacy Shield [website](#), EU applicants may invoke binding arbitration for non-monetary issues when other dispute resolution procedures have been exhausted.

#### 6.6 Contact Us

Please contact us using the contact information under Section 4.3, Inquiries, Complaints and Objections above if you have any questions related to the Privacy Shield, wish to exercise your rights of access, or wish to seek other assistance as described above.

### **7. Changes to this Policy**

7.1 Raytheon reserves the right to modify this Policy by posting changes to relevant Raytheon websites. If you submit additional Applicant Information or request to be considered for a Raytheon position following the effective date of revisions to this Policy, your Applicant Information will be handled in accordance with the Policy in effect at that time.