

APPLICANT PRIVACY POLICY

Last Updated: June 2018

Laureate Education, Inc. (“Laureate”) values your trust and is committed to the responsible management, use and protection of personal information. This Applicant Privacy Policy (“**Policy**”) describes our practices in connection with all the information that we collect through the Careers section of our website (located at <https://jobs.laureate.net>) (“**Careers Site**”), from professional networking platforms or other job listing platforms where you have interacted with our jobs listings and/or authorized the platform to share with us your profile or other information with us, such as LinkedIn Jobs Match (“**Third-Party Platforms**”), through our and our affiliates’ locally posted job listings (such as on an affiliate’s website), and offline, in connection with your application for a job or internship with Laureate or one of our affiliates. Personal information submitted elsewhere on Laureate’s and its affiliates’ websites will be used in accordance with our general online Privacy Policy at <https://www.laureate.net/Legal/LegalInformation>.

PERSONAL INFORMATION WE COLLECT

Personal Information You Provide

“Personal information” is information that identifies you as an individual or relates to an identifiable individual. We collect personal information from you in connection with your application:

Personal information we collect includes:

- Name, address, telephone number, e-mail address, and other contact information;
- Username and password;
- Work authorization status;
- CV, résumé, cover letter, previous work experience, and education information;
- Skills;
- 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 about race/ethnic origin, gender, and disability of our applicants, for monitoring equal opportunity. We can also inquire about criminal records. We will do so only where permitted by applicable law. Otherwise, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, except where such information is legally required. Sensitive information includes race, religion, ethnicity, nationality or national origin, age, gender identity, 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, veteran status, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings.

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

If you provide us with personal information 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 information to us.

Personal Information from Other Sources

For the purpose of background check reports in connection with your application, and as permitted by applicable law, Laureate obtains information about you from other sources.

Other sources include:

- Your references
- Prior employers
- Educational institutions you attended
- Professional social media sites
- Publicly available information about you

USE OF PERSONAL INFORMATION

We collect and process information about you for one or more of these reasons:

- a) Because you voluntarily provide this information and consent for us to process it;
- b) Because this information is necessary to take steps at your request prior to entering into an employment or internship;
- c) Because this information is of particular importance to us and we have a specific legitimate interest under law to process it;
- d) To comply with a legal obligation; or
- e) 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 Information that you submit will be used for Laureate'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 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 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 Careers Site and changes to our terms and policies. We will engage in these activities to manage our prospective 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 if we 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 our administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Laureate and its affiliates.

The information about you will be added to Laureate’s international candidate database and can be retained and used to consider you for opportunities at Laureate and its affiliates other than the one(s) for which you apply. If you do not wish us to do this, please contact us at the address in the “*Contact Us*” section below.

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

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

DISCLOSURE AND TRANSFER OF PERSONAL INFORMATION

Laureate shares personal information with affiliates that are involved in evaluating candidates for a given position. You can consult the list and location of our affiliates [here](#).

We will limit access to personal information to personnel with a business need to know the information for the purposes described in this Policy, including, but not limited to, personnel in the recruiting, human resources and information technology departments, and in the department responsible for the position for which you are applying.

Laureate also shares personal information with our third-party service providers to facilitate services they provide to us, including hosting and operating the Careers Site, recruiting assistance, reference checking, and background check processing.

Disclosing your personal information can include transferring personal information 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 [here](#)). 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 information. You may obtain a copy of these measures [here](#).

OTHER USES AND DISCLOSURES OF PERSONAL INFORMATION

We also use and disclose your personal information 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 affiliates, you or others.
- In connection with a sale or business transaction.
 - We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)

DATA RETENTION

We will retain personal information for the period necessary to fulfil 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) as long as we have an ongoing relationship with you; (iii) as required by a legal obligation to which we are subject; and (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 information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, Laureate can delete personal information about you (including your CV/résumé) from our database at any time and without providing any reason. Therefore, please retain your own copy of the personal information provided to us.

PASSIVE INFORMATION COLLECTION: COOKIES AND SIMILAR TECHNOLOGY

We and our service providers use “cookies” and similar technologies on the Careers Site. Please see our [Privacy Policy](#) for more information.

CHOICES AND ACCESS

If you register on the Careers Site, you may access, review, and change your personal information stored therein by logging into the Careers 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 information that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your personal information 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 information; request that we cease using your personal information as permitted by applicable law; or request a copy or portability of your personal information. 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 information you would like to access or have changed, whether you would like to have personal information 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 information.

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

ADDITIONAL INFORMATION FOR THE EEA

You also may:

- Contact us at privacy@laureate.net with any questions about this Policy.
- Obtain contact information for our data protection officer responsible for your country or region, if applicable, by writing to us at privacy@laureate.net.
- Lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct. A list of EEA Data Protection Authorities is available [here](#).

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect personal information 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.

Laureate hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to us.

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 or from which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by Laureate or our affiliates.

DIVERSITY

Laureate is an equal opportunity employer, which means we offer equal treatment to all applicants. Laureate does not discriminate, either directly or indirectly, on protected grounds: race, colour, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status or genetic information in any area of recruitment.

LAW APPLICABLE TO JOB APPLICATION

The Careers Site, Third-Party Platforms, and offline collection allow you to apply for jobs worldwide, as a benefit of Laureate’s centralized global recruitment function. The Careers Site and Third-Party Platforms are operated from the United States. Accordingly, any personal information you submit through them will be collected in the United States and will be subject to U.S. laws. If, however, we share your personal information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your personal information in accordance with this Policy. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

ABOUT CHILDREN

The Careers Site is not intended for minors under the age of 18.

CURRENT PERSONNEL OF LAUREATE

If you currently work for Laureate or one of our affiliates, you must be eligible to apply for a different position within Laureate to use the Careers Site or otherwise submit an application to us. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs, and HR policies applicable to that position.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

CHANGES TO THE POLICY

We reserve the right to amend this Policy at any time in order to address future developments of Laureate, the Careers Site or a Third-Party Platform, 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 Careers Site.

CONTACT US

If you have questions or requests, please feel free to contact us at privacy@laureate.net or at 650 S. Exeter Street, Baltimore, Maryland 21202-4382, U.S.A.

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