



Candidate Privacy Policy

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1. General Information

1.1 Introduction to Braze

Braze, Inc. is a U.S. company, headquartered in New York, with global operations. A reference to “Braze,” “we,” “us” or the “Company” is a reference to Braze, Inc. and the relevant Braze affiliate(s) involved in the processing activity.

Braze is a life-cycle engagement platform for companies around the world, supporting stronger relationships between brands and their clients, primarily by leveraging first party data to personalize and automate life-cycle marketing campaigns through first party channels, such as email, SMS, mobile and web push notifications, and in-app/in-browser messaging.

More information about Braze can be found at www.braze.com.

1.2 Our Commitment to Privacy

Your privacy is important to us and maintaining your trust is one of our highest priorities. This Candidate Privacy Policy (“**Policy**”) provides you with a description of how we collect and use data relating to or identifying individuals (“**Personal Data**”) who apply for a job with Braze. We also provide information on privacy rights, how to exercise these rights and how to contact us with any related questions.

1.3 Scope of This Policy

What is in scope?

This Policy applies to Braze’s use of Personal Data for recruitment purposes. Individuals who are interested in, apply for, or are recruited for a job with Braze (“**Candidates**”) should read this Policy to understand how we use their Personal Data.

For this processing activity, Braze is the party determining which Personal Data it processes and how and why such Personal Data is processed (“**Data Controller**”).

What is not in scope?

The [Braze Website Privacy Policy](#) describes our processing activities, other than Candidate recruitment, for which Braze is a Data Controller.

Personal Data that we process on behalf of our customers is governed by the privacy commitments in our customer agreements and is not within the scope of this Policy or the Braze Website Privacy Policy.

Additionally, Braze-managed websites may contain links to other websites, applications and services maintained by third parties. The privacy and data security practices of such third-party sites and/or services are governed by the privacy statements of those third parties, and not by this Policy.

This Policy does not create or form part of any contract for employment or otherwise.

2. Data Collection and Use

2.1 Data Collection

How and where do we collect data?

Braze collects Personal Data from Candidates who apply to work with us, or who view or share job postings by Braze.

Braze collects Candidate Personal Data from a variety of sources, including:

- The Candidate in their job application, cover letter, communications and as shared during the interview and recruitment process
- Employment agencies and recruiters
- Referrals and professional references
- Background checks and other screening service providers
- Educational institutions
- Social media and professional network profiles and other publicly available sources
- Braze personnel

- Online activity information that we and our service providers collect through your use of the careers website we maintain at www.braze.com/careers ("**Careers Site**") or other online recruitment pages.

What type of data do we collect?

Personal Data that we may collect includes, but is not limited to:

- **Contact information**, such as home address, telephone number, email address, or social media username;
- **Information from job application materials, referrers or recruiters**, such as your job application, resume or CV, cover letter, writing samples, references, work history, education transcripts, whether you are subject to prior employer obligations, and other information that referrers or recruiters provide about you or that you provide to us;
- **Educational history information**, such as schools attended, graduation date, GPA, degrees attained, and area of study;
- **Professional qualifications**, such as licenses, permits, memberships, and certifications;
- **Information from the application process**, such as any video or audio recordings from phone screens or interviews, evaluations and outcomes of recruiting exercises, employment negotiations, travel arrangements made by Braze, and interview related expenses and reimbursements;
- **Information needed to verify your identity and employment eligibility**, such as immigration status, visa or work permit information, and government issued identification information, including your social security number, driver's license, or passport;
- **Biographical information**, such as name, gender, gender pronouns, date of birth, age, race/ethnicity, sex, gender identity, veteran status, citizenship, professional history, references, language proficiencies, education details, and information you make publicly available through job search, career networking, or social media sites;
- **Background check information**, such as information necessary to complete background, criminal, and/or other checks, when permitted by law, and information received during these checks;
- **Information needed to understand and assess accommodation requests** regarding potential disabilities or other health conditions;
- **Vaccine and health information** such as Covid 19 vaccine status, and information relevant to other disease management programs, when relevant and when permitted or required by law;
- **Electronic and Internet related information**, such as IP address, cookies and similar technologies from use of our recruitment system and website, and
- **Other information you provide to us.**

In certain cases, we may ask you for additional information for purposes of complying with applicable laws. Braze does not necessarily collect all of the Personal Data types listed from all Candidates and will not collect Personal Data that is prohibited by applicable law.

2.2 Use of Personal Data

We use your Personal Data for recruitment and other business purposes, which are listed below:

- **General recruitment management, such as:**
 - Operating the Careers Site or any other site to which this Policy is posted;
 - Recruiting, interviewing and evaluating Candidates;
 - Conducting background checks, verifying your provided information, and other pre-employment screening (where permitted by law);

- Analyzing and improving our application and recruitment processes;
- Accommodating disabilities or health conditions;
- Preparing your employment agreement if offered a job;
- Communicating with you regarding your candidacy, opportunities with the Company or about the Careers Site and any changes to applicable terms or policies; and
- Other business operations such as internal training practices.
- **Legal, compliance and security purposes, such as:**
 - Complying with or monitoring compliance with legal and other requirements, such as reporting and equal opportunities monitoring requirements, where applicable;
 - Complying with lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
 - Protecting our, your or others' rights, safety and property;
 - Investigating and deterring against fraudulent, harmful, unauthorized, unethical or illegal activity, or conduct in violation of our policies or procedures;
- **Analytics.** Creating aggregated and deidentified data that we use to analyze our recruitment and business purposes.

2.3 Sharing and Disclosure of Personal Data to Third Parties

We may share with, and disclose Personal Data to, the following types of third parties and for the following purposes:

- **Company Service Providers.** Companies that provide us with services that help us manage the recruiting process and operate our business, such as job boards, recruiters, interviewing and testing services/tools, pre-employment screening, professional advisors such as lawyers or accountants, interview travel booking and expense reimbursement, relocation, and recruitment analytics.
- **Government Authorities and Law Enforcement.** Government authorities, law enforcement, courts, and others as described in the “Legal, compliance and security purposes” sub-section of Section 2.2 (Use of Personal Data).
- **Corporate Transaction Participants.** Parties to transactions whereby we sell, transfer, or otherwise share some or all of our business or assets, including your Personal Data, such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.
- **Professional Advisors.** Professional advisers, including lawyers and immigration advisors who provide consultancy and legal services.

3. International Transfers, Security and Data Retention

3.1 Processing of Personal Data in the U.S. and Elsewhere

Braze, Inc. is located in the United States (“**U.S.**”) and our group companies operate in Singapore, Germany, Japan, Canada, France, Australia, Indonesia the United Kingdom (“**UK**”), and Ireland. Braze works with vendors and partners who operate predominantly in these countries. From time to time, we may work with vendors and partners in other parts of the world where we do business. This means that when we collect your Personal Data, we may process it in any of these countries. These countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as protective), but we have in place appropriate safeguards and international transfer mechanisms (e.g., the Data Privacy Framework or the EU Standard Contractual Clauses). We also implement a number of supplementary measures designed to better protect the Personal Data with which we are entrusted.

Where available, Braze, Inc. complies with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework (collectively, the “**Data Privacy Framework**”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union, the UK and Switzerland, as applicable, to the U.S. in reliance on the Data Privacy Framework. Please visit our [Data Privacy Framework Notice](#) for further information.

For non-U.S. transfers, Braze may rely on an alternative transfer mechanism, including the 2021 EU Standard Contractual Clauses, to transfer Personal Data from the UK and European Economic Area (“**EEA**”) to other third-party countries.

3.2 Security

We use technical, organizational and administrative security measures designed to protect the security, confidentiality and integrity of your Personal Data. However, security risk is inherent in internet and information technologies and we cannot guarantee the security of your Personal Data.

3.3 Data Retention

We will retain Personal Data we collect from you for so long as we have an ongoing legitimate business need to do so (in connection with the purposes set out above in Section 2.2 (Use of Personal Data)). We determine the appropriate retention period for Personal Data based on the purpose for which we process the Personal Data, the amount, nature and sensitivity of your Personal Data processed, the potential risk of harm from unauthorized use or disclosure of your Personal Data and whether we can achieve the purposes of the processing through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation). When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymize it.

4. Your Privacy Rights

4.1 Exercising Your Privacy Rights

You may have the right under applicable law to request that we take certain actions in connection with your Personal Data. Not all jurisdictions grant privacy rights, so whether or not you have any such rights, and the nature of those rights, are determined by multiple factors, including your location, country, state, or place of residence. Privacy rights may include the following:

- **Information:** You may be able to request information about the categories of Personal Data we collect, the categories of sources from which we collect it, the purposes for which we process it, and the categories of third parties to whom we disclose it.
- **Access:** You may be able to request access to the Personal Data we hold about you.
- **Rectification/correction:** You may be able to request modification or correction of your Personal Data if it is inaccurate or incomplete.
- **Erasure/deletion:** You may be able to request that we delete your Personal Data.
- **Restriction:** You may be able to request that we restrict use of your Personal Data.
- **Objection:** You may be able to object to the processing of your Personal Data.
- **Portability:** You may be able to request a copy of your Personal Data in a structured, commonly used, machine-readable format.
- **Automated Decision Making:** You may be able to request not to be subject to a decision based solely on automated processing, where it produces a legal or similar effect. We do not

use automated decision making that produces a legal or similar effect in the recruitment process.

If you wish to exercise any of these requests, please fill out this [form](#). We will respond to requests from individuals wishing to exercise data protection rights applicable to them. For certain rights, such as where you request access to your Personal Data, we will need to confirm your identity. To verify your identity, we may require you to provide ID, where permitted or required by applicable law. You also have the right to exercise your applicable privacy rights free from discriminatory treatment and retaliation, as prohibited by applicable law. These rights are not absolute, and in certain cases we may decline or partially decline your request, as permitted by law.

You have the right to complain to a data protection authority about our collection and use of your Personal Data. For more information, please contact your local supervisory authority. If you have a question about your privacy rights, please email us at privacy@braze.com.

5. Legal Basis for Processing Personal Data

This section applies to you if you are a Candidate from a region that requires us to have a legal basis for processing your Personal Data.

Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. We will normally collect Personal Data from you only where we have your consent to do so, where we need the Personal Data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person.

Some of the information we collect about you may include information that constitutes special categories of data or sensitive personal data (i.e., personal data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life or sexual orientation of the individual) under applicable data protection law. We process this data for different reasons, which vary by jurisdiction. For example, we may process this data as necessary to comply with anti-discrimination laws and legal reporting obligations, to monitor equal employment opportunity, or to understand disabilities requiring accommodation. We will not use, disclose to third parties or otherwise process this data without requesting your consent unless the processing is required by law or applicable data protection law expressly authorizes the processing of this data without consent on a different legal basis (e.g., to carry out our obligations in the field of employment law). Any such consent request will identify the purposes for which we will use this data. Whether or not to give the requested consent is voluntary and for you to decide.

6. Important Information for Candidates who are California Residents

If you are a California resident, this Section 6 applies to you in addition to the rest of the Policy. It provides more detail on how we collect, use and share Personal Information (as defined below) of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this Section 6, Personal Information has the meaning given in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CCPA”). However, this statement does not apply to information exempted from the scope of the CCPA.

6.1 Your California Privacy Rights

As a California resident, you have information, access, rectification/correction, erasure/deletion, and non-discrimination rights as described in Section 4.1 (Exercising Your Privacy Rights). In addition, you have the right to opt-out of the “sale” or “sharing” of Personal Information as those terms are defined by the CCPA.

If you have appointed an authorized agent to act on your behalf, your authorized agent may request to exercise these rights on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given by you to your authorized agent pursuant to applicable California law. If you have not provided your agent with such a power of attorney, we may ask you and/or your agent to take additional steps permitted by law to verify that your request is authorized, such as information required to verify your identity and that you have given the authorized agent permission to submit the request.

6.2 The Sale and Sharing of Personal Information

Like many companies, Braze uses services that employ cookies and other technologies to collect Personal Information (including the identifiers and internet activity information described in the table below) about your use of our websites and other online services over time, which helps us to deliver targeted ads. Our use of some of these cookies may constitute the “sale” or “sharing” of Personal Information as defined under the CCPA. You may opt-out of such sales or sharing by clicking on the “Do Not Sell or Share my Personal Information” [link](#) in the footer of our websites.

While our websites, including our Careers Site, are not directed to children under the age of 16, we are required to inform you that we have no actual knowledge that we have sold or shared the Personal Information of California residents under 16 years of age.

6.3 Categories of Personal Information that We Collect and Third Parties with Whom the Data May Be Shared

The following table describes our practices currently in use and in use during the past 12 months. This table summarizes the Personal Information we collect by reference to the statutory categories specified in the CCPA, and the categories of third parties to whom we may disclose it for a business purpose. These third parties are defined in Section 2.3 (Sharing and Disclosure of Personal Data to Third Parties). Information you voluntarily provide to us, such as in free form webforms or via email, may contain other categories of Personal Information not described below. The business/commercial purposes for which we use the categories of Personal Information listed in the below table are described above in Section 2.2 (Use of Personal Data). Our relevant data retention practices are addressed in Section 3.3 (Data Retention). All references above to Personal Data refer to Personal Information as used in this Section, as defined by the CCPA.

CATEGORY OF PERSONAL INFORMATION AS DEFINED IN THE CCPA* <i>*The categories of data set forth below appear in the CCPA but are not necessarily collected by Braze.</i>	PERSONAL INFORMATION WE MAY COLLECT	SOURCE OF YOUR PERSONAL INFORMATION	THIRD PARTIES WITH WHOM WE MAY SHARE PERSONAL INFORMATION
Identifiers , which the CCPA defines to include	<ul style="list-style-type: none"> ● Name and preferred name 	<ul style="list-style-type: none"> ● You 	<ul style="list-style-type: none"> ● Company Service Providers

<p>as real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> ● Contact information, including your work and home address, telephone number, and email address ● Government-issued identification information, including your social security number, driver's license, and passport ● Social media username 	<ul style="list-style-type: none"> ● Employment agencies and recruiters 	<ul style="list-style-type: none"> ● Government Authorities and Law Enforcement ● Corporate Transaction Participants ● Professional Advisors
<p>Protected Classification Characteristics, which the CCPA defines to include age (40 years or older), race, color, ancestry, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression), sexual orientation, veteran or military status, genetic information.</p>	<ul style="list-style-type: none"> ● Race/ethnicity ● Sex, gender identity ● Veteran status ● Citizenship ● Information needed to understand and assess accommodation requests regarding potential disabilities or other health conditions 	<ul style="list-style-type: none"> ● You 	<ul style="list-style-type: none"> ● Company Service Providers ● Government Authorities and Law Enforcement ● Corporate Transaction Participants ● Professional Advisors
<p>Commercial information, which the CCPA defines to include records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> ● Reimbursements for interview related expenses 	<ul style="list-style-type: none"> ● You 	<ul style="list-style-type: none"> ● Company Service Providers ● Government Authorities and Law Enforcement ● Corporate Transaction Participants ● Professional Advisors
<p>Internet or other electronic network activity information, which the CCPA defines to include browsing history, search history, and information</p>	<ul style="list-style-type: none"> ● Cookies and similar technologies when you use our recruitment system and browse our website 	<ul style="list-style-type: none"> ● Automated collection from IT systems 	<ul style="list-style-type: none"> ● Company Service Providers ● Government Authorities and Law Enforcement

<p>regarding a consumer's interaction with an internet website application, or advertisement.</p>	<ul style="list-style-type: none"> ● Device data, including device and application identification numbers, location, browser type, Internet service provider and/or mobile carrier 		<ul style="list-style-type: none"> ● Corporate Transaction Participants ● Professional Advisors
<p>Audio, electronic, visual, thermal, olfactory, or similar information</p>	<ul style="list-style-type: none"> ● Video recordings from security cameras ● Audio or video recordings of interviews, with your permission 	<ul style="list-style-type: none"> ● IT recording systems 	<ul style="list-style-type: none"> ● Company Service Providers ● Government Authorities and Law Enforcement ● Corporate Transaction Participants ● Professional Advisors
<p>Professional or Employment-Related Information</p>	<ul style="list-style-type: none"> ● Employment history, references, and professional qualifications including licenses, permits, memberships and certifications ● Information needed to verify your employment eligibility, including immigration status, visa and work permit information ● Job application, cover letter, and writing samples ● Information provided by referrers about you ● Interview notes, evaluations and outcomes of recruiting exercises ● Information necessary to complete background checks where permitted by law 	<ul style="list-style-type: none"> ● You ● Referrals and professional references, background check and other screening service providers ● Your educational institutions ● Social media profiles and other publicly available sources ● Employment agencies and recruiters ● Other company personnel 	<ul style="list-style-type: none"> ● Company Service Providers ● Government Authorities and Law Enforcement ● Corporate Transaction Participants ● Professional Advisors

	<ul style="list-style-type: none"> • Travel arrangements made by Braze • Vaccine and/or health status for Covid 19 or other disease management programs 		
Educational information that is not publicly available	<ul style="list-style-type: none"> • Educational history information, including schools attended, graduation date, GPA, degrees attained, area of study, student number and other information that may be included on a resume/CV 	<ul style="list-style-type: none"> • You • Referrals and professional references, background check and other screening service providers • Your educational institutions • Employment agencies and recruiters 	<ul style="list-style-type: none"> • Company Service Providers • Government Authorities and Law Enforcement
Sensitive information, which the CCPA defines to include social security number, driver’s license number, state ID card, passport number, log-in credentials, financial account number, debit card or credit card number in combination with any required security or access code, password or credentials allowing access to an account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs or union membership, the content of a person’s mail, email or text message (unless Braze is the intended recipient), genetic data.	<ul style="list-style-type: none"> • Government-issued identification information, including your social security number, driver’s license number, and passport number • Race/ethnicity 	<ul style="list-style-type: none"> • You 	<ul style="list-style-type: none"> • Company Service Providers • Government Authorities and Law Enforcement • Corporate Transaction Participants • Professional Advisors
	<p>Other Personal Information We Collect</p> <ul style="list-style-type: none"> • Biographical information, including 	<ul style="list-style-type: none"> • You • Social media profiles and other publicly available sources 	<ul style="list-style-type: none"> • Company Service Providers • Government Authorities and Law Enforcement

	date of birth and language proficiencies <ul style="list-style-type: none"> • Social media profiles and activity 		<ul style="list-style-type: none"> • Corporate Transaction Participants • Professional Advisors
Inferences , which are defined under the CCPA to include information drawn from data to create a profile about a person reflecting the person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	These may be derived from any of the categories of data listed above	<ul style="list-style-type: none"> • You • All of the sources listed above 	<ul style="list-style-type: none"> • Company Service Providers • Government Authorities and Law Enforcement • Corporate Transaction Participants • Professional Advisors

6.4 Sensitive Personal Information and De-Identified Data

Braze does not use or disclose Sensitive Personal Information (as defined by the CCPA) for restricted purposes that California residents have a right to limit under the CCPA.

We do not to attempt to re-identify de-identified information that we derive from Personal Information, except for the purpose of testing whether our deidentification processes comply with applicable law.

7. Other Important Information

7.1 Changes to This Policy

If we change our Policy, we will update the "Last Updated" date at the top of this webpage. We encourage you to review this Policy frequently to stay informed of the latest modifications.

7.2 Children

The Careers Site is not intended for, Braze does not seek to hire or collect Personal Data on, minors under the age of 18. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us by using the information in Section 7.4 (How to Contact Us) below, and we will take steps to delete such Personal Data from our systems.

7.3 Your Obligations

Among other obligations, including without limitation, the obligation to provide complete and accurate information in recruiting documents and processes, it is your responsibility to ensure that information you submit does not violate any third party’s rights.

7.4 How to Contact Us

If you have questions about this Policy, if you have a complaint, or if you would like to contact our Data Protection Officer (DPO), you may contact us at:

privacy@braze.com

or

Braze, Inc.
Attention: General Counsel
330 West 34th Street, 18th Floor
New York, NY 10001
USA