



ByteDance US Applicant Privacy Notice

Effective Date: 23 November 2021

ByteDance ("we" or "us") has prepared this Applicant Privacy Notice ("Notice") for applicants to roles with ByteDance. This Notice describes how we handle and protect your personal data in connection with our recruiting processes and programmes. This Notice applies to the personal data of job applicants and potential candidates for employment. We think that it is very important that you understand who we are, how we use your personal data and that we take our obligations in this regard very seriously. The purpose of this Notice is therefore to give you information about how ByteDance collects, processes, stores and otherwise uses your personal data and your rights in relation to that data.

ByteDance needs to process your personal data in order to process your application for employment. There may also be statutory requirements we have to comply with in relation to your application. If we are not able to carry out the processing activities we describe in this Notice we may not be able to continue with your application.

For the purposes of this Notice, references to "ByteDance" comprises the following U.S. entities: ByteDance Inc., TikTok Inc., and any US incorporated affiliates.

In addition, you will see several references to the "ByteDance Group", which includes all other ByteDance entities globally. As with many other ByteDance policies, we may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data. Any material updates to this document which may affect you will be communicated to you through appropriate channels, such as on the ByteDance job applicant site or via ByteDance's communication tools.

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To help you find information on any particular question you might have, we have set out an index below:

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What categories of personal data does the Company collect about me?

ByteDance generally collects, processes and uses the following categories and types of personal data about you when you apply for a job, as may be required:

- **Identifiers**, such as real name, nickname or alias, postal address, telephone number, e-mail address, Social Security number, signature, online identifier, Internet Protocol address, driver's license number or state identification card number, gender, birthday, nationality, immigration or visa number, and passport number;
- **Paper and electronic records that contain personal data**, name, signature, photo and physical description, application and interview responses, applicant feedback and survey responses regarding the recruiting process or applicant portal, financial or payment information (e.g., bank account name and number for direct deposits), insurance information insurance policy number and information, and medical information (e.g., information and records necessary for occupational health surveillance, occupational health and safety compliance and record-keeping, to conduct fitness-for-duty examinations, and information necessary to respond to an applicant's medical emergency)
- **Characteristics of protected classifications**: such as race, national origin, disability, sex, and veteran status, religious, philosophical or political beliefs, and other characteristics of protected classifications under state or federal law, such as information necessary to comply with the reporting requirements of the federal Equal Employment Opportunity Act and the federal Office of Contracting Compliance Programs (applicable to government contractors). *Note: generally, this information is collected on a voluntary basis and is used in support of our equal opportunity and diversity and inclusion efforts within the Company, as well as for our legal reporting obligations, or where otherwise required by law;*
- **Internet or other electronic network activity information**, such as browsing history, search history, and information regarding an applicant's interaction with Company electronic resources, websites, application, or other online services, as well as physical and network access logs and other network activity information related to your use of any Company electronic resources;
- **Audio, video and other electronic data**, such as audio, electronic, visual, or similar information, such as, CCTV footage, photographs, and call recordings and other audio recording (e.g., recorded meetings and webinars)
- **Employment information**, such as professional or employment-related information, including evaluations, membership in professional organizations, professional certifications, and employment history;
- **Education information**: information about education history or background, such

as academic transcripts, educational discipline records, and academic counseling records;

- **Inferences**, such as inferences drawn from the information we collect about you, such as interview data and responses.

For what purposes does the Company need my applicant personal data?

Purposes of collecting. Generally, we may use and disclose the above categories of personal data for the following business purposes:

- **Recruiting, hiring and managing, and evaluating Applicants.** To review, assess, recruit, consider or otherwise manage applicants and job applications, including:
 - To evaluate applicants' qualifications for employment with the Company
 - To communicate with applicants
 - For diversity and inclusion purposes within the Company as well as related to reporting obligations
 - To arrange and manage Company- sponsored events
 - To create a talent pool for future job openings
 - For recordkeeping purposes, such as to demonstrate applicants' agreement to, or acceptance of, documents presented to them, e.g., pre-employment arbitration agreement, acknowledgement of employment application, offer letter
 - To evaluate and improve the recruiting process, such as by requesting feedback through surveys about the recruiting process or our applicant portal
 - To conduct fitness-for-duty examinations
 - Scheduling and conducting interviews
 - Identifying applicants, including by working with external recruiters
 - Reviewing, assessing and verifying information provided, to conduct criminal and background checks (where relevant and pursuant to applicable law), and to otherwise screen or evaluate applicants' qualifications, suitability and relevant characteristics
 - Extending offers, negotiating the terms of offers, and assessing salary and compensation matters
 - Satisfying legal and regulatory obligations
- **Security and Monitoring.** In order to monitor and secure our resources, network, premises and assets, including securing our offices, premises and physical assets,

including through the use of electronic access systems and video monitoring

- **Health and Safety.** For health and safety purposes, such as:
 - Conducting appropriate health and safety screenings of individuals prior to entering or accessing certain locations or premises
- As otherwise necessary to protect the health and safety of applicants, personnel and visitors to our premises
- **Compliance with Applicable Legal Obligations.** Relating to compliance with applicable legal, regulatory, ethical and corporate responsibility obligations, such as:
 - Administering the Company’s complaint processes and procedures
 - Reporting suspected criminal conduct to law enforcement and cooperating in investigations
 - For occupational health surveillance and occupational health and safety compliance and record-keeping
 - Responding to subpoenas and court orders
 - Conducting assessments, reviews and reporting relating to our obligations, including under employment and labor laws and regulations, social security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance. **Improving and evaluating our recruiting process.** To evaluate and improve our recruiting process, including in support of meeting our diversity and inclusion efforts and for candidates the opportunity to self-identify.
- **Auditing, Accounting and Corporate Governance.** Relating to financial, tax and accounting audits, and audits and assessments of our business operations, security controls, financial controls, or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.
- **M&A and Other Business Transactions.** For purposes of planning, due diligence and implementation of commercial transactions (e.g., mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions).
- **Defending and Protecting Rights.** In order to protect and defend our rights and interests and those of third parties, including to manage and respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.

Who might ByteDance share my personal data with, and where?

As you may know, the ByteDance entity to which you are applying for a role is part of

the global ByteDance Group, with offices located across the globe, which support HR administration and provide services such as cloud storage, research and development, analytics and security.

ByteDance may also transfer your personal data to third parties outside of the ByteDance Group. The types of third parties we share your data with, and the reasons why we share it, are as follows:

- **Regulators, authorities, business partners and other third parties.** We may need to share your personal data with regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors, accountants, lawyers and consultants), insurance, pensions and benefits providers (for successful applications), internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Acquiring entities.** If the ByteDance business to which you are applying is sold or transferred in whole or in part (or such a sale or transfer is being contemplated), your personal data may be transferred to acquiring entity as part of the transfer itself or as part of an initial review for such transfer (i.e. as part of any due diligence). This is subject to any rights provided by applicable law, including jurisdictions where the acquiring entity is located.
- **Service providers acting on behalf of ByteDance.** As necessary for the purposes of processing listed above, your data may be shared with third parties to process under appropriate instructions and on behalf of the relevant ByteDance entity ("Data Processors"). Data Processors may carry out instructions related to applicant data administration including, where applicable, external recruitment agencies and recruitment system providers (including support and maintenance), payroll, compensation & benefits (for successful applicants), training, health and safety, compliance, photography and videography, and other activities. Data Processors are subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard personal data and to process it only as instructed.

For more information on who we share your personal data with, and where it is transferred to, you can contact us as set out below (Who can I contact about this Notice?).

Some of the third party recipients we may share applicant data with may be located in countries outside of the country where you apply.

For transfers to ByteDance Group entities outside of the country where you apply (an "International Transfer"), ByteDance takes measures to ensure your personal data is adequately protected. For International Transfers to third parties, ByteDance will also take necessary measures to ensure that your data is adequately protected. This will also include using appropriate safeguards such as the appropriate contractual clauses in our agreements with such recipients.

How long with ByteDance retain my personal data?

It is ByteDance's policy not to store personal data for longer than is necessary and to retain such data on a basis proportionate to achieving the purposes prescribed above. This means that ByteDance retains personal data for: (i) the period of time required for the purposes for which it was collected; (ii) any compatible and lawful purposes subsequently established; (iii) any new purposes to which you subsequently consent; and/or (iv) compliance with legal and regulatory requirements.

Who can I contact about this Notice?

If you have concerns or questions regarding this Notice or our handling of your personal data, you can get hold of the right person at hrdataprotection@bytedance.com.