

VIASAT – APPLICANT PRIVACY POLICY

1. OUR APPROACH TO PRIVACY

- 1.1 Viasat is committed to protecting and respecting your privacy. This privacy policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you ("**personal information**") when you apply for a position with Viasat.
- 1.2 Please ensure that you have read and understood how we collect, store, use and disclose your personal information as described in this privacy policy.

2. DATA CONTROLLER

- 2.1 A list of Viasat companies that this policy applies to can be found at **Annex 1**. The Viasat company to which you submit your application will be the data controller of your personal information, and reference to "**Viasat**", "**we**" or "**us**" in this policy are references to that company.

If you are unsure which Viasat company is the data controller of your personal information, please contact your local People and Culture representative using the contact details in **Annex 1**.

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

- 3.1 We collect personal information that you voluntarily submit directly to us, such as when you submit your application to us or communicate with us in respect of your application. This can include your name, address, emergency contacts, education details and qualification details and previous employment history.
- 3.2 We may collect personal information about you from publically available sources when considering your application. This can include information on social media profiles and other publically available information for us to use as reference checks and screening.
- 3.3 When we collect such information from you, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we may be unable to perform some of our obligations to you.
- 3.4 If we decide to offer you employment, we may also collect personal information about you from other parties, such as information provided by recruiters, executive search firms, referees and the results of any background checks against public or government databases.
- 3.5 We may also create and maintain internal records which may contain personal information about you, such as application or interview evaluation notes.

The table in **Annex 2** sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information and the recipients of the personal information.

4. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

- 4.1 We will store the personal information we collect about you for no longer than necessary for the purposes set out in Annex 2 and in accordance with our legal obligations and legitimate business interests.
- 4.2 If your application is successful and you become an employee or independent contractor of Viasat, the personal information we collect during the application process may be transferred to your personnel file and stored in accordance with our Employee Privacy Policy. We will give you a copy of this policy at the start of your employment with Viasat.
- 4.3 If your application is not successful, to the extent that you give us consent to do so, we may also keep your personal information for the purpose of considering your application for employment with other Viasat companies or for other positions with Viasat.
- 4.4 Where you have given us your consent to process certain equal opportunities information, such as personal information relating to your gender and ethnicity, we may anonymise and aggregate this information, and store it in such form that does not identify you, for the purpose of monitoring and improving the application process.
- 4.5 In all cases, data held by us will only be used consistent with the relevant and applicable legal requirements of the country in which the personal information is collected.

5. RECIPIENTS OF PERSONAL INFORMATION

- 5.1 We may share your personal information with the following (as required in accordance with the uses set out in Annex 2):
- (a) **Other Viasat companies:** personal information may be transferred to our parent company, Viasat, Inc, and other Viasat companies in connection with:
 - (i) the provision of centralised human resources management;
 - (ii) group business planning, budgeting, reporting and strategy;
 - (iii) group-level legal and regulatory compliance and managing associated risks, providing legal advice and in connection with potential or actual litigation;
 - (iv) reporting, assessing and responding to claims for risk management.
 - (b) **Service providers and advisors:** we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing employment benefits, mailing or email services, tax and accounting services, or payments processing. Such data may be disclosed in connection with:
 - (i) the provision of centralised human resources management;
 - (ii) the provision of centralised IT infrastructure;
 - (iii) centralised processing of salary and benefits payments;

- (iv) obtaining professional services such as legal and accountancy services on behalf of the entire group.
- (c) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.
- (d) **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or personal safety of Viasat, our employees or others.

6. CONSENT

- 6.1 We may need your consent for some uses of certain personal information. For instance, in certain circumstances, we may need your consent to use certain "sensitive" information, such as information about your health or ethnicity, in particular ways.
- 6.2 If we need your consent, we will notify you of the personal information we intend to use and how we intend to use it.
- 6.3 You do not have to give us consent. Where you have given us consent to collect, use or disclose your personal information in a certain way, you may withdraw your consent at any time. If you wish to withdraw any consent that you have given us, please contact us using the details below.

7. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

- 7.1 **Security.** We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on secure servers.
- 7.2 **International Transfers of your Personal Information.** The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third-party service providers have operations. If you are located in the European Union ("EU"), your personal information may be processed outside of the EU, including in the United States; these international transfers of your personal information will be made pursuant to appropriate safeguards, such as standard data protection clauses adopted by the European Commission. If you wish to enquire further about these safeguards used, please contact us using the details set out at the end of this privacy policy.

8. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

8.1 In accordance with the applicable privacy laws in the country where you reside, you may have the following rights in respect of your personal information that we hold:

- (a) **Right of access.** You may have the right to obtain:
 - (i) confirmation of whether, and where, we are processing your personal information;
 - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
 - (iii) information about the categories of recipients with whom we may share your personal information; and
 - (iv) a copy of the personal information we hold about you.
- (b) **Right of portability.** You may have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
- (c) **Right to rectification.** You may have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You may have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You may have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- (f) **Right to object.** You may have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.

8.2 If one of the above rights applies to you under applicable local law, and you wish to exercise one of these rights, please contact recruiting@viasat.com.

9. You also have the right to lodge a complaint to the supervisory authority in your country of residence. If you are in the EU, you can obtain further information by contacting your local data protection authority.

10. CHANGES TO THIS POLICY

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

11. CONTACTING US

- 11.1 Please contact recruiting@viasat.com if you have any questions, comments and requests regarding this Privacy Policy.

- 11.2 This privacy policy was last modified on September 11, 2018.

ANNEX 1 – VIASAT ENTITIES THIS POLICY APPLIES TO

Entity	HR representative contact details
<p><i>Viasat AF, Inc.</i> <i>V3GS Austria GmbH</i> <i>Viasat Australia Pty Limited</i> <i>Viasat Brasil Participacoes Limitada</i> <i>Viasat Brasil Servicos de Comunicacoes Limitada</i> <i>Viasat Canada Corp.</i> <i>Viasat, Inc. Limitada</i> <i>MBC Czech Republic s.r.o.</i> <i>Exede DEU GmbH</i> <i>Engreen India Private Limited</i> <i>Viasat India Pvt. Ltd.</i> <i>Viasat Ireland Ltd.</i> <i>IOM Licensing Holding Company Limited</i> <i>Viasat (IOM) Limited</i> <i>Viasat Israel Ltd.</i> <i>Viasat Europe S.r.L.</i> <i>Viasat Satellite Ventures Holdings Luxembourg S.a.r.l.</i> <i>Carmel Comunicaciones, S.A. de C.V.</i> <i>Viasat Tecnologia S.A. de C.V.</i> <i>VGlobal Corp, S.A. de C.V.</i> <i>MBC Netherlands B.V.</i> <i>Viasat Broadband Holdings B.V.</i> <i>Viasat Netherlands B.V.</i> <i>Viasat Peru S.R.L.</i> <i>MBC Poland LLC sp. z o.o.</i> <i>Euro Broadband Infrastructure Sàrl</i> <i>Euro Broadband Retail Sàrl</i> <i>MBC Switzerland Sàrl</i> <i>Viasat Antenna Systems S.A.</i> <i>Horsebridge Defence and Security Limited</i> <i>Viasat Satellite Holdings Limited</i> <i>Viasat Technologies Limited</i> <i>Viasat UK Limited</i> <i>Viasat VS3 Holdings Limited</i> <i>Engreen, Inc.</i> <i>TrellisWare Technologies, Inc.</i> <i>Viasat China Services, Inc.</i> <i>Viasat Worldwide Limited</i> <i>VParent, Inc.</i> <i>VService, Inc.</i></p>	<p><i>recruiting@viasat.com</i></p>

ANNEX 2 – PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for the processing
Personal contact details , such as your name, phone number, address and e-mail address.	We may use this information to open and maintain applicant records.	The processing is necessary for our legitimate interests, namely managing job applications for positions with Viasat.
	We may use this information to communicate with you as part of the recruitment process.	The processing is necessary for our legitimate interests, namely communicating with applicants and managing job applications for positions with Viasat.
	We may use this information to conduct identity and background checks, if applicable.	We will use your personal information in this way to the extent you have given us consent to do so.
Job application information , such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience, and other information contained in your CV.	We may use this information to process job applications, including assessing your suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We may use this information to calculate proposed salary and assessing eligibility for certain benefits.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We may use this information to monitor and improve our application process.	The processing is necessary for our legitimate interests, namely reviewing and updating our applications process.
Results of reference checks and screening , such as verification of education and employment history.	We may use this information to process job applications, including assessing your suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We may use this information to fulfil our obligations under applicable law, regulations, legal processes or enforceable government requests.	The processing is necessary for compliance with a legal obligation to which we are subject.

<p>Results of background checks, such as criminal records checks and other searches relevant to the role for which you are applying.</p>	<p>We may use this information to verify your suitability for a role, where the nature of the role requires additional background checks (e.g. disqualification as a director or driving licence checks).</p>	<p>We will only process this personal information to the extent that you have given us your explicit consent to do so.</p>
<p>Nationality, citizenship and right to work information, such as country of birth, government identification documents (including passports and residency permits) and, where relevant, visa information.</p>	<p>We may use this information to determine your eligibility to work.</p>	<p>The processing is necessary for compliance with a legal obligation to which we are subject.</p>
	<p>We may use this information to fulfil our obligations to relevant government authorities.</p>	<p>The processing is necessary for compliance with a legal obligation to which we are subject.</p>
<p>Interview evaluation and appraisal information, such as comments and notes made by interviewers or other Viasat employees in connection with your application.</p>	<p>We may use this information to process job applications, including assessing your suitability for a role.</p>	<p>The processing is necessary in order to take steps prior to entering into a contract with you.</p>
	<p>We may use this information to calculate proposed salary and assessing eligibility for certain benefits.</p>	<p>The processing is necessary in order to take steps prior to entering into a contract with you.</p>
	<p>We may use this information to monitor and improve our application process.</p>	<p>The processing is necessary for our legitimate interests, namely assessing and managing applications for positions with Viasat.</p>
<p>Any other data provided by you in the course of the application process, including electronic communications with you in relation to the application process.</p>	<p>We may use this information to process your application, including assessing your suitability for a role.</p>	<p>The processing is necessary in order to take steps prior to entering into a contract with you.</p>
	<p>We may use this information to respond to your enquiries and to monitor and improve our application process.</p>	<p>The processing is necessary for our legitimate interests, namely managing applications and improving the application process.</p>
<p>Equal opportunities monitoring information, such as information relating to your gender, ethnicity, religion and sexual orientation.</p>	<p>We may anonymise and aggregate this information to monitor and improve our application process.</p>	<p>We will only process this personal information to the extent that you have given us your explicit consent to do so.</p>