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Ecolab Applicant Privacy Notice

This Applicant Privacy Notice ("Applicant Privacy Notice" or "Notice") describes the handling of personal information obtained about internal and external job applicants who have applied directly through the [Ecolab Jobs Site](#) as well as through third party agencies and recruiters on behalf of job applicants. Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

This Applicant Privacy Notice describes how Ecolab ("we", "us," or "our") collects and processes personal information about you, how we use and protect this information, and the rights that may be available to you under applicable law regarding this information. Ecolab acknowledges that certain laws may impose additional requirements than those described in this Applicant Privacy Notice. This Notice is supplemental to the public-facing [Ecolab Privacy Policy](#), to the extent you may have interacted with the public-facing areas of the Ecolab website during your application process. Also, any local notices or privacy-related disclosures specific to your country of residence shall supersede this Applicant Privacy Notice, the degree to which there is a conflict.

What Personal Information Do We Collect About You?

The personal information that we collect in conjunction with your job application may include the following:

- Name and contact information (for example, address; phone number; email, fax);
- Emergency contact information (for example, phone number; relation);
- Personnel information (for example, date of birth, marital status, birthplace, nationality, residency, citizenship, work permit status, military status, nationality, preferred language);
- Identification information (for example, SSN or other national identification number, passport number, driver's license number, license plate number);
- Account information (for example, login credentials for Ecolab Job Portal);
- Education and training (for example, education level, field and institution, competency assessments, professional licenses and certifications, or training courses);
- Professional history (for example, previous employers or previous positions; letters of recommendation);
- Audio and visual information (for example CCTV recordings if you visit one of our offices);
- Unique personal identifiers affiliated with certain website tracking technology as described in [Ecolab's Cookie Notice](#), and as you can opt-out of consistent with that Cookie Notice (for example device identifier; cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology; or other forms of persistent identifiers). Please note that, while this Applicant Privacy Notice applies across all applicant activity, the applicability of cookies and the affiliated cookie notice may vary if you are on certain websites outside of www.ecolab.com.

We may collect sensitive or special category information about you, as permitted or required

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by local laws. Sensitive information is personal information that may have special protection under certain data protection laws. We consider the following categories of information as sensitive information that we collect for the following reasons, to the extent legally allowed or for the purposes of complying with local laws:

- Information related to diversity (for example, race, ethnicity, gender, religion, veteran status and/or disabilities);
- Citizenship or immigration information (for example, for visa purposes, right to work information);
- Information about any health issues or disabilities (for example, your disability status, any requests for accommodation in the application or interview process);
- Information about your health status, where appropriate (for example, confirmation of your wellness before attending an in-person interview);
- Your trade union, works council membership or employee representative status, if you disclose this in your resume or during the interview process.

We may also collect any sensitive information that you voluntarily disclose, including the information described above and other information you choose to share during the application process such as political opinions or religious or philosophical beliefs.

If we request your explicit consent to collect sensitive information about you, you have the right to withdraw that consent at any time by contacting us at dataprivacy@ecolab.com (not all of the categories mentioned above require your consent).

What Are the Sources of Personal Information Collected by Ecolab?

When providing personal information to Ecolab as described in this Applicant Privacy Notice, that personal information is typically collected directly from you, and you will know the precise personal information being collected by us. If you visit one of our offices, we may collect audio and visual data (for example, CCTV recordings) related to that visit.

If you are a job applicant using a third-party job search engine, a social media platform (for example LinkedIn), or a recruiter that is not affiliated with Ecolab, Ecolab may receive some of your personal information indirectly through those respective sources. Please be advised this Applicant Privacy Notice does not apply to external third parties and Ecolab has no control over the privacy practices of external third parties. It is recommended that you review the privacy practices of the particular website, entity, or individual by contacting them directly or reviewing information available on their websites.

In certain limited circumstances, third-party service providers may collect information on behalf of Ecolab (for example for the purposes of background checks, screening, etc.). In those cases, the collection of your information will be within the context of your employment or application, and we will inform you that a third-party is collecting your information.

How Does Ecolab Use Personal Information?

Subject to the terms of this Applicant Privacy Notice, Ecolab uses the above-described categories of personal information in several ways. Unless otherwise

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stated specifically, the above information may be used for any of the purposes listed below. These purposes are not all inclusive, and you may receive subsequent notice about additional purposes for other, specific types of processing. Ecolab may use your personal information to:

- Determine your eligibility for employment, including verification of references and qualifications;
- Assess qualifications for a particular job or task;
- Contact you regarding other recruitment opportunities;
- Provide general information about Ecolab;
- Respond to your queries and requests;
- Administer our applications, software, and electronic systems;
- Prevent potentially fraudulent, prohibited, or illegal activities.

In applicable countries, the information that you provide in the equal opportunities section of a job application will be used for the sole purpose of monitoring equal opportunities within the Ecolab global enterprise. Ecolab does not use this information for marketing purposes.

What Is the Legal Basis for Processing Your Personal Information?

In some jurisdictions we must have a legal basis to process your personal information. In most cases the legal basis will be one or more of the following:

- To comply with our contractual obligations to you or to take steps to enter into a contract with you;
- To comply with our legal obligations;
- Your consent; and/or
- To meet our legitimate interests, for example to conduct our recruitment processes efficiently and fairly or to manage applications effectively. When we process personal information to meet our legitimate interests, we put in place safeguards to ensure that our legitimate interests do not override your privacy and other fundamental rights and freedoms.

When we are required by local law to collect certain personal information about you, your failure to provide this information may prevent or delay the fulfillment of our legal obligations and may impact our ability to employ you. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us at dataprivacy@ecolab.com.

How Does Ecolab Share Your Personal Information?

When applying for a job with Ecolab, access to your personal information will be limited to those persons necessary for consideration of your job application. Processing of your application may require your information be transferred to Ecolab individuals or groups outside your country of residence. If transferred outside your country of residence, such transfer will be subject to your jurisdiction's data privacy law and this Applicant Privacy Notice.

Parties receiving your information may include:

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- Our affiliates and related companies;
- Business partners, contractors, and channel partners, which are not considered affiliated companies.
- Third-party vendors or service providers providing crucial services and necessary to support your application;
- Government agencies or other parties in response to legal process or other requests, where permitted by law;
- With other persons or third parties with whom you have requested that we share information.

In addition, we may release personal information: (i) to the extent we have a good-faith belief that such action is necessary to comply with any applicable law; (ii) when disclosure is required to protect the security of other persons, consistent with applicable laws (iii) to respond to a court order, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or (iv) in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets.

Ecolab will not share your personal information for commercial or marketing purposes without your express consent.

How Long Does Ecolab Retain Your Personal Information?

Ecolab will retain your personal information only for as long as is necessary for the purposes set out in this Applicant Privacy Notice and as allowable under or required by applicable law. You may inquire at any time regarding the length of retention for your personal information. If you are a job applicant whose application is not accepted, you may request that Ecolab delete your information, in which case Ecolab will not be able to keep you informed of future employment opportunities.

International Data Transfer

If you are located outside the United States, in particular if you are located in Canada, Brazil, the European Union (“EU”), the European Economic Area (“EEA”), New Zealand, the Republic of South Africa, Switzerland, the United Kingdom, Republic of Korea, or other countries with similar data privacy laws, please note that we and our servers are located in the United States. Any information that you provide to us may be transferred to and processed in the United States or other countries around the world where we do business. Although this may include recipients of information located in countries where there may be a lower level of legal protection for your personal information than in your country, we will make efforts to protect your information in accordance with requirements applicable to the law in your particular jurisdiction and take steps to only share with third parties that offer similar protection. By engaging with and providing personal information and other data that Ecolab may legitimately collect, process, use or transfer in connection with your relationship with Ecolab, you unambiguously consent to your information being collected, processed, used, and transferred as disclosed herein.

Data Privacy Framework Program

Ecolab complies with the EU-U.S. Data Privacy Framework (“EU-U.S. DPF”), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“Swiss-U.S. DPF”) as set forth by the U.S. Department of Commerce (collectively, the “DPF Program”).

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Ecolab has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (“EU-U.S. DPF Principles”) when processing personal information received from the EU and UK. Ecolab has also certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (“Swiss-U.S. DPF Principles,” together with “EU-U.S. DPF Principles” are referred to as “Principles”) when processing personal information received from Switzerland. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles (including the UK Extension) and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>. To view the complete list of participating organizations, please visit <https://www.dataprivacyframework.gov/s/participant-search>. Under certain circumstances, Ecolab may remain liable for the acts of certain third parties if those third parties process PI originating from the EU, the UK, Gibraltar and/or Switzerland that Ecolab discloses to them in a manner that is inconsistent with the Principles.

If you have any inquiries or complaints about our handling of your personal information under the DPF, please contact us using the information in the "Contact Us" section below. If you still have a specific privacy concern that has not been resolved after attempting to address your privacy question or concern with Ecolab directly, Ecolab has committed to working with the panel established by the EU Data Protection Authorities (DPAs), the UK Information Commissioner’s Office (ICO), the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal information received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. As described in the DPF Program, individuals may have the option to select binding arbitration for the resolution of your complaint with respect to personal information originating in the EU, the UK, Gibraltar or Switzerland. Please visit the DPF Program website linked above for the most up-to-date information.

Ecolab is subject to the investigatory and enforcement authority of the U.S. Federal Trade Commission for purposes of enforcing compliance with the DPF. Additionally, under limited circumstances, public authorities in the U.S., including but not limited to, the U.S. Federal Government, may make lawful requests of Ecolab to obtain certain personal information with which Ecolab must comply.

Republic of Korea Residents

This section applies specifically to residents of the Republic of Korea (“Korea”) and supplements our general Applicant Privacy Notice to ensure compliance with the Personal Information Protection Act (“PIPA”) and related Korean privacy laws. For Korean residents, where any conflicts exist between this section and our main policy, this section takes precedence.

Definition of Personal Information For Korean residents, “personal information” means any information about a living individual that can identify that person directly (such as name, resident registration number, or photos) or indirectly when combined with other readily available information.

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Purpose of Collection and Use We collect and use your personal information for the purposes described in this Notice. Under PIPA's principle of minimum collection, we only collect personal information that is necessary for the following recruitment-related purposes:

- Determining your eligibility for employment
- Verifying your qualifications and references
- Conducting necessary background checks
- Communicating with you about your application
- Complying with legal obligations related to employment

We do not collect or use your personal information for any purposes beyond those stated in this Notice. Any additional collection or use will require your separate consent.

Unique Identification Information We collect unique identification information (such as resident registration number, passport number, driver's license number, or alien registration number) only in very limited circumstances during the recruitment process. For resident registration numbers, we do not collect this information during the application stage. Such information may only be requested after a hiring decision is made and only to the extent required by law for employment contract preparation.

For other unique identification information, we may collect passport numbers for visa processing or driver's license numbers if driving is an essential job requirement. We implement enhanced security measures for any unique identification information including encryption and restricted access. You have the right to refuse providing such information during the application process, though this may affect our ability to process applications requiring specific qualifications or work authorizations.

Sensitive Information We collect the following sensitive information only with your explicit consent: race, ethnicity, or national origin; political opinions or party membership; religious or philosophical beliefs; trade union membership; health or disability information; and any other information that could significantly impact privacy. We implement additional security measures for sensitive information including separate storage, access controls, and encryption. You may withdraw your consent for processing sensitive information at any time by contacting dataprivacy@ecolab.com.

Information collected from third parties If we collect your personal information from third-party sources (such as recruiters or job platforms), you have the right under Article 20 of PIPA to request information about the source of collection, our processing purposes, and your right to refuse processing.

Data Sharing We may share your personal information with third parties in limited circumstances. When we share your information with third parties, they receive and

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independently control your data according to their own privacy policies. For cross-border transfers, we ensure appropriate safeguards are in place such as adequacy decisions or standard contractual clauses. We also engage processors who handle your information solely on our behalf under strict contractual obligations.

Third-party sharing:

Category	Purpose	Information Shared	Transfer Country	Transfer Method	Retention Period
Ecolab Inc.	Global integrated recruitment management	Name, contact information, education, work experience, entire application form	USA	Encrypted dedicated network	Until the completion of the recruitment process
Workday Inc.	Data storage and processing operations on behalf of Ecolab Inc.	Name, contact information, education, work experience	USA	Encrypted dedicated network	Until the completion of the recruitment process

Entrusted processing:

Processor	Country	Contact Information	Entrusted Tasks	Personal Information Items	Transfer Method
[Background check provider]	[Country]	[Contact info]	Criminal and employment verification	Name, ID, employment history	Secure API/encrypted transmission
[Recruitment platform provider]	[Country]	[Contact info]	Application management	All application data	Secure platform access
[Assessment provider]	[Country]	[Contact info]	Skills and aptitude testing	Test results, candidate responses	Encrypted data transfer

You may refuse international transfer of your personal information by contacting us at dataprivacy@ecolab.com. You can request specific transfer details and information about the safeguards we have implemented to protect your data during transfer.

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Data Retention and Destruction We retain your personal information for as long as necessary for the recruitment process and as required by applicable laws. We destroy personal information without delay when it becomes unnecessary, such as upon expiration of the retention period or achievement of the processing purpose.

- **Destruction Process:** Once the retention period expires, your personal data is moved to a separate database and destroyed after storage for a certain period as required by applicable laws and our internal policies.
- **Destruction Methods:** We delete personal data stored in electronic files using technical means that make restoration impossible. We destroy your personal data through de-identification so that individuals cannot be identified.

Behavioral Information Collection and Use We collect behavioral information through cookies and similar tracking technologies to enhance your website experience and analyze usage patterns. When this behavioral information can identify you individually, we obtain your consent as required by Korean law.

You can control behavioral information collection through the following methods:

- **Browser Settings:**
 - Chrome: Settings → Privacy and Security → Cookies and other site data → Block third-party cookies
 - Firefox: Settings → Privacy & Security → Enhanced Tracking Protection → Strict
 - Safari: Preferences → Privacy → Prevent cross-site tracking
 - Edge: Settings → Privacy, search, and services → Tracking prevention → Strict
- **Mobile Device Settings:**
 - Android: Settings → Privacy → Advanced → Ads → Opt out of Ads Personalization
 - iOS: Settings → Privacy & Security → Tracking → Toggle off 'Allow Apps to Request to Track'

Please refer to our Cookie Notice for detailed information about cookie usage and your control options.

Contact Information If you require any further clarification regarding this Privacy Notice, or wish to exercise your rights regarding your personal data, please contact us as follows:

- Email: dataprivacy@ecolab.com
- Privacy Officer: Theresa E. Corona, Legal Department, 651 250 2054 / theresa.corona@ecolab.com
- Domestic Representative: Joomi Yang / 8F, Sono Tower 135, Beobwon-ro Songpaju, Seoul, Korea / 1588-7595 / joomi.yang@ecolab.com

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Korean residents can apply for dispute resolution or consultation to the following institutions for remedies for personal information infringement:

- Personal Information Infringement Report Center: (without area code) 118
- Personal Information Dispute Mediation Committee: (without area code) 1833-6972
- Supreme Prosecutors' Office Cybercrime Investigation Division: (without area code) 1301
- National Police Agency Cyber Investigation Bureau: (without area code) 182

Business Transfers In the event of a merger, acquisition, or sale of our business that involves your personal information, we will notify affected individuals and post public notice on our website at least 30 days in advance. Our notification will include the fact of transfer, recipient contact information, and your options to object to the transfer as required by Article 27 of PIPA.

Policy Updates and History We may update this Privacy Notice to reflect changes in our practices, technology, or legal requirements. For Korean residents, we maintain previous policy versions and clearly indicate changes made.

- Current Policy Version: 1 April 2026

Your Rights over Your Personal Information.

You have certain rights regarding your personal Information, which may vary based on applicable local laws. These include the following rights to:

- Access your personal information;
- Fix any errors in your personal information;
- Erase or delete your personal information;
- Restrict our use of your personal information;
- Object to our use of your personal information;
- Receive personal information in a usable electronic format and transmit it to a third party (right to data portability);
- Lodge a complaint with your local data protection authority or regulatory body;
- Not be discriminated against for exercising your rights described above.

If you would like to exercise any such right, please contact us at dataprivacy@ecolab.com or call us at 844-880-8355.

We may need to verify your identity and place of residence before completing your request. We will reach out to you directly should we require additional information to verify your identity.

If you are an authorized agent wishing to exercise rights on behalf of a California resident, please contact the Privacy Team at dataprivacy@ecolab.com and provide a copy of the consumer's written authorization designating you as their agent.

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We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

Information Security, Data Integrity and Employee Responsibility

Ecolab will take reasonable steps to protect your personal information in Ecolab's possession and secure against risk of loss, misuse, unauthorized access, disclosure, alteration, and destruction. We employ industry-standard security measures designed to protect the security of all information collected during the job applicant process. Ecolab periodically reviews its security measures in an effort to ensure the privacy of personal information. However, the security of information transmitted through the internet or via a mobile device can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data.

Changes to This Notice

Ecolab reserves the right to modify this Applicant Privacy Notice from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Applicant Privacy Notice, Ecolab will provide you with the revised notice. This Applicant Privacy Notice was last modified as of September 2024.

Contact Us

If you have any questions or comments about this Applicant Privacy Notice or the Service provided by Ecolab, please contact us at 844-880-8355 or dataprivacy@ecolab.com.