

**Globant values individual privacy and we want to give our Site's visitors the opportunity to know what information we collect about them and how it is treated by us.**

This Privacy Policy (this "Policy"), effective as of April 4th, 2021, explains:

1. Which information about you we collect.
2. Purposes of using your personal information and legal basis.
3. Retention of your personal information.
4. Disclosures of personal information.
5. Where is your personal information stored and which are your access rights.
6. Additional Disclosures for California Residents.
7. Brazilian Privacy Statement.
8. Contact us.

## **1. Information about you we collect.**

### **a) Information collected automatically when you visit our site:**

When navigating our websites and accessing or using our Services, Globant will collect and store Cookies. If you would like more information, please visit our [cookie policy page](#).

Globant will also collect and store Cookies. "Cookies" are text files placed in your computer's browser to store certain preferences and information, which may enhance your browsing experience on Globant's websites. Cookies may be used to personalize your website experience, such as recognizing you by name when you return. Globant does not use Cookies to track or collect personal identification information from website users. If you desire, instructions for your browser will allow you to make certain settings on your computer to warn you before a Cookie is stored, block all Cookies or erase Cookies from your hard drive.

### **b) Information is collected when you volunteer to identify yourself, and provide requested information:**

You may choose to write to us, or fill out certain forms or online data requests, which provide your name, telephone number, e-mail address, job and related information.

## **2. Purposes of using your personal information and legal basis.**

Globant uses the information collected from you to: (i) to respond to your inquiries; (ii) consider your request or application, (iii) send you appropriate information in regards to news, events, job openings and related information you subscribed to, and (iv) for direct marketing purposes, including to send you newsletters, client alerts and information we think may interest you. Globant may also use such data for market and consumer studies regarding product types, demographics and consumer preferences.

We are entitled to use your personal information based on (i) our legitimate interest such as for research and development, to market and promote our services, to protect our legal rights and interests, to the extent that your interests or your fundamental rights are not overridden; (ii) your consent to do so for a specific purpose; or (iii) to process your data to comply with a legal obligation.

### **3. Retention of your personal information.**

Globant will retain your personal information for as long as necessary to fulfill the purposes for which it was collected or as necessary to comply with our legal obligations, resolve disputes, and maintain appropriate business records. Once the purpose has been fulfilled your personal information will be retained and blocked up due to the possibility of legal and governmental requirements and until their status of limitations have run out.

### **4. Disclosures of personal information.**

Globant may share your personal information with affiliated companies.

In addition, Globant reserves the right to disclose information where required by law or to comply with valid legal process (such as a search warrant, subpoena or court order) as well as to protect Globant's rights or property, including without limitation in the event of a transfer of control of Globant or substantially all of its assets, or during emergencies when safety is at risk.

### **5. Where is your personal information stored and which are your access rights.**

- Storage of the Information

All of the information collected by Globant through the Website is stored on secured servers, to protect against unauthorized use and access.

- Your access rights.

You can exercise your rights of access, rectification, erasure, restriction, opposition, personal information portability, and / or withdrawal of consent regarding your personal information which is stored in our server by email to the following address: [privacy@globant.com](mailto:privacy@globant.com)

### **6. Additional Disclosures for California Residents**

If you are a California resident, the *California Consumer Privacy Rights Act 2018* (CCPA) requires us to provide you with certain information regarding the personal information collected by Globant that relates to, or is reasonably capable of being associated with, you as an individual. The below disclosures supplement the information provided in our general Privacy Policy ("Policy") and describe our information collection practices going back 12 months prior to the date of any Consumer Request submitted in accordance with this supplemental privacy policy.

## **A) Disclosures Required by CCPA**

- **Categories of Personal Information we Collect (collectively “Personal Information”)**

We may collect Personal Information about you, including, but not limited to:

**Identifying Information** such as your name, address, e-mail address, phone numbers.

**Internet Activity** internet or other electronic network activity information, including but not limited to browsing history, search history, interaction with an internet website, application or advertisement.

**Employment Related Information** such as your CV as well as current and past employment information.

**Educational Information**, such as grades, schools and years attended.

- **Sale of Personal Information**

We do not sell any of your Personal Information.

## **B) Consumer Rights for California Residents**

- **No Sale of Information**

As we do not sell any of your Personal Information, the right to opt out from the sale of personal information does not apply to Information collected by us.

- **Right to Know/Access Specific Pieces of Information**

With respect to the Personal Information we have collected from you in any 12 months prior to you making a consumer request, you have the right to information about the categories of Personal Information we collected, and, for each category, the commercial purposes of such collection, the categories of sources for such Personal Information, and the categories of parties such information has been shared with, if any.

In addition, you have the right to access specific pieces of Personal Information collected about you. You may exercise this right no more than twice in any given 12 months period.

- **Right to Request of Deletion of Information**

You have the right to require us to permanently delete certain Personal Information that we collected from you. However, this right is subject to a variety of restrictions and exceptions, for example we may have to keep your Personal Data that is necessary for legal and legitimate business purposes, to resolve potential disputes, to make or defend legal claims, to conduct audits and/or to enforce any agreements.

- **How to Exercise your Deletion Rights, Right to Know or Right to Access Personal Information**

You must make a verified request, i.e., a request indicating what type of right you wish to exercise that allows us to make sure that you are the person authorized to make such a request or a duly authorized agent of such a person. Typically, we need to be able to verify the identity of the person making any such request.

Please contact us either by phone at 1-800-921-2240 or by e-mail at [privacy@globant.com](mailto:privacy@globant.com) to communicate your request. We will get back to you within 10 days at the latest to confirm receipt of your request and inform you about the next steps. If we are able to verify your request, we typically provide you with the requested information or otherwise act on your request within 45 days from the date of its receipt. If we are unable to complete the actions required to comply with your request within the ordinary 45 day time period, we will notify you during that time period and provide you with an update, including how much additional time we need to comply with your request.

Under certain circumstances, we are authorized to refuse compliance with your Consumer Request, e.g., if we are unable to verify that you or the person making the request is in fact authorized to do so, your request is manifestly unfounded, or excessive, in particular because of its repetitive character, or if doing so would force us to violate other legal obligations recognized by California law. In each case we will provide you with a written explanation highlighting the reasons for our decision.

There is no charge for exercising your Consumer Rights, provided however, that we may impose a reasonable administrative fee taking into account the cost of acting on your request in case your request is manifestly unfounded or excessive.

- **No Discrimination for Exercise of Consumer Rights**

We will not discriminate against you for exercising any rights you may have as a consumer under CCPA.

- **Other California Privacy Rights**

California's "Shine the Light" law permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties for their direct marketing purposes.

- **Children's Privacy**

Our website is not intended for, nor targeted to, children under 13, and we do not knowingly request or collect personal information from any person under 13 years of age. If we learn that

we have received information directly from a child who is under the age of 13, we will delete the information in accordance with applicable law.

- **Effective Date of Privacy Notice**

This privacy notice was released as of April 4th, 2021. It may be updated from time to time without notice to you.

## **7. Brazilian Privacy Statement**

Data collected and/or processed in Brazil, or other data processed in relation to people and/or services located in Brazil, shall be also subject to the provisions of Brazilian General Data Protection Law (Law nr. 13.709/2018 – Lei Geral de Proteção de Dados Pessoais or LGPD). Any requests regarding data protection in Brazil shall be directed to the email [privacy@globant.com](mailto:privacy@globant.com). Our person “in charge” (encarregado, in accordance with Art. 41, §1º, LGPD) is Mr. Bryan Longo, lawyer at Clasen & Casado Filho Sociedade de Advogados.

## **8. Contact Us**

If you have questions or concerns regarding the way in which your personal data is being processed or this Policy, please email us at [privacy@globant.com](mailto:privacy@globant.com) or reach out to Globant using the contact information below:

Globant S.A.  
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