

# Beckhoff Applicant Privacy Notice for California Applicants

Revised and effective August/2025

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## INTRODUCTION

Beckhoff Automation LLC (“**Beckhoff**”) is providing this Beckhoff Applicant Privacy Notice for California Applicant (“Applicant Privacy Notice”) to provide information to its job applicants (“**Applicants**”) regarding how we collect and use your Personal Information in connection with your application for employment or to become a contractor with Beckhoff. In this Notice, “Personal Information” has the meaning given to the term in the California Consumer Privacy Act.

## SCOPE OF THIS POLICY

This **Applicant** Privacy Notice applies only to Personal Information processed in the 12-months preceding the effective date in the context of Beckhoff’s human resources (“**HR**”), job opportunity, job application, and contractor application processes.

Beckhoff’s consumer Data Privacy Policy (“**Consumer Privacy Policy**”) describes how we collect, use, and protect the Personal Information of individuals who use the Beckhoff website (<https://www.beckhoff.com/en-us/>) and other online services. The Consumer Privacy Policy will apply to the extent Beckhoff applicants use any Beckhoff products or services directed at consumers.

## HOW TO CONTACT US

**Beckhoff Automation LLC**

[beckhoff.usa@beckhoff.com](mailto:beckhoff.usa@beckhoff.com)

1-952-890-0000

See below for information relating to how to submit requests to exercise your rights in the Personal Information we process.

## CATEGORIES OF PERSONAL INFORMATION

This chart describes the categories of Personal Information that Beckhoff may collect in connection with the job application process. Note, all Personal Information may be used and disclosed in connection with our Business Purposes, as defined below.

Category of Personal Information & Representative Data Elements	Common Purposes for Collecting & Sharing
<b>Contact Data</b> <ul style="list-style-type: none"><li>• Honorifics and titles</li><li>• Preferred names</li><li>• Mailing address</li><li>• Email address</li><li>• Telephone number</li><li>• Mobile number</li></ul>	We use your Contact Data to communicate with you by mail, email, telephone, or text about your application for employment. Contact Data is also used to help us identify you and personalize our communications, such as by using your preferred name.
<b>Identity Data</b>	We use your Identity Data to identify you in our HR records and systems, to communicate with you (in connection with your Contact Data), to facilitate our relationship with you, for internal

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Category of Personal Information & Representative Data Elements	Common Purposes for Collecting & Sharing
<ul style="list-style-type: none"><li>• Full name, nicknames, or previous names (such as maiden names)</li><li>• Date of birth</li><li>• Language</li><li>• System identifiers (e.g., usernames or online credentials)</li></ul>	record-keeping and reporting (including for data matching and analytics), and for most processing purposes described in this Applicant Privacy Notice, including governmental reporting, employment/immigration verification, background checks, etc.
<b>Government ID Data</b> <ul style="list-style-type: none"><li>• Social security/national insurance number</li><li>• Driver's license information</li><li>• Passport information</li><li>• Other government-issued identifiers as may be needed for risk management or compliance (e.g., if you are a licensed professional, we will collect your license number)</li></ul>	We use your Government ID Data to identify you; for background screening such as reference checks, license verifications, and criminal records checks (subject to applicable law); and for security and risk management (such as fraud prevention and similar purposes).
<b>Biographical Data</b> <ul style="list-style-type: none"><li>• Resume or CV</li><li>• Application and screening questionnaires</li><li>• Data from information publicly available on the Internet</li><li>• Education and degree information</li><li>• Employment or other work history</li><li>• Professional licenses, certifications, and memberships and affiliations</li><li>• Personal and professional skills and talents summaries (e.g., languages spoken, CPR certification status, community service participation), interests and hobbies</li><li>• Professional goals and interests</li><li>• Criminal records</li></ul>	We use Biographical Data to help us assess suitability for job roles and ensure a good fit between each individual's background and relevant job functions. We also use Biographical Data for recruiting and to guide our decisions about internal programs and service offerings.
<b>Health Data</b> <ul style="list-style-type: none"><li>• Medical information for accommodation of disabilities</li></ul>	We may collect Health Data as needed to provide disability accommodations during the application process.

Category of Personal Information & Representative Data Elements	Common Purposes for Collecting & Sharing
<p><b>Audio/Visual Data</b></p> <ul style="list-style-type: none"> <li>• Photographs</li> <li>• Video images, videoconference records</li> <li>• Call center recordings and call monitoring records</li> <li>• Voicemails</li> </ul>	<p>We may collect Audio/Visual Data if you participate in a video interview or call screening, or otherwise communicate with us via video or telephone conference.</p>
<p><b>Compliance and Demographic Data</b></p> <ul style="list-style-type: none"> <li>• Employment eligibility verification records, background screening records, and other records maintained to demonstrate compliance with applicable laws, such as payroll tax laws, ADA, FMLA, ERISA, etc.</li> </ul>	<p>We use Compliance and Demographic Data for internal governance, for corporate ethics programs, for institutional risk management, for reporting, for demonstrating compliance and accountability externally, and as needed for litigation and defense of claims.</p>
<p><b>Sensitive Personal Information</b>                      The following categories of data we collect are considered “Sensitive Personal Information:”</p> <p style="text-align: center;"><b>Government ID Data</b></p>	<p>We are required by applicable law to collect Social Security number, and to review an employee’s documentation upon hiring/re-hiring. You may choose which documents to present within the U.S. guidelines for I-9 documentation. We are required by applicable law to retain images of the presented documentation. Documentation may include: Social Security card, Driver’s license, passport, state ID, or birth certificate.</p>

**SOURCES OF PERSONAL INFORMATION**

We collect Personal Information from various sources, which vary depending on the context in which we process that Personal Information.

- **Data you provide us** – We will receive your Personal Information when you provide it to us or otherwise direct information to us.
- **Data from a third party** – We will receive your Personal Information from third parties such as recruiters, credit reporting agencies, or employment screening providers.
- **Data from publicly available sources** – We may collect data that is publicly available on the Internet (e.g. through a Google search of a candidate’s name).
- **Data we collect automatically** – We may also collect information about or generated by any device you have used to access applications and networks.

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- **Data we receive from service providers** – We receive information from service providers performing services on our behalf.
- **Data we create or infer** – We (or third parties operating on our behalf) create and infer Personal Information such as Inference Data based on our observations or analysis of other Personal Information processed under this Privacy Notice, and we may correlate this data with other data we process about you. We may combine Personal Information about you that we receive from you and from third parties.

### DISCLOSURE OF PERSONAL INFORMATION

We generally process HR Personal Information internally; however, it may be shared or processed externally by third party service providers, when required by law or necessary to complete a transaction, or in other circumstances described below.

#### CATEGORIES OF INTERNAL RECIPIENTS

The Personal Information identified below collected from Applicants may be disclosed to the following categories of recipients in relevant contexts.

- **Personnel of HR Departments** – All Personal Information relating to HR and Recruitment.
- **Department managers or other interviewers searching for new employees or contractors** – Personal Information of job candidates contained in job applications to the extent allowed by relevant laws and departmental needs.

#### CATEGORIES OF EXTERNAL RECIPIENTS

Beckhoff may provide HR Personal Information to external third parties as described below. The specific information disclosed may vary depending on context but will be limited to the extent reasonably appropriate given the purpose of processing and the reasonable requirements of the third party and Beckhoff. We generally provide information to:

- Our subsidiaries, affiliates, and parent company.
- Service providers, vendors, and similar data processors that process Personal Information on Beckhoff's behalf (e.g., background checks, recruiting agencies) or that provide other services for our Personnel or for Beckhoff.
- Prospective sellers or buyers of our business or assets in the event Beckhoff sells or buys any business or assets.
- Your employment references, to inform them that you have applied with Beckhoff as part of our recruiting.
- Government agencies or departments, employee unions, or similar parties in connection with employment-related matters.
- Any public authority in relation to national security or law enforcement requests, if Beckhoff is required to disclose Personal Information in response to lawful requests by a public authority.
- Any other appropriate third party, if Beckhoff is under a duty to disclose or share your Personal Information to comply with any legal obligation or to protect the rights, property, health, or safety of Beckhoff, our employees, contractors, customers, or others.

#### Locations of Recipients

Beckhoff and some Beckhoff affiliates are in the United States. Any Personal Information collected under this Policy will likely be processed in the United States, in addition to any other jurisdiction where such Beckhoff affiliates are located.

#### **PURPOSES FOR COLLECTING, USING, AND DISCLOSING PERSONAL INFORMATION**

Beckhoff collects Personal Information about Applicants for various general HR and business purposes, as described below. We do not sell or “share” (as defined in CCPA) HR Personal Information with third parties in exchange for monetary consideration or for advertising purposes.

#### GENERAL HR PURPOSES

We generally process your Personal Information for the following HR purposes:

- Recruitment and staffing, including evaluation of skills and job placement.
- Hiring decisions, including negotiation of compensation, benefits, relocation packages, etc.
- Risk management, including reference and other background checks.
- National and State HR reporting, including compliance with CA Pay Data reporting, Nevada business deductions, and any other legally mandated governmental disclosures.

#### BUSINESS PURPOSES

We and our Service Providers process Personal Information for the following “Business Purposes”:

- Maintaining comprehensive and up-to-date Applicant records.
- Establishing the employment or other working relationship.
- Verifying and authenticating Identity.
- Complying with laws and regulations, including without limitation all uses and disclosures of Personal Information that are required by court orders and applicable laws, regulations, orders and ordinances, and for compliance with legally-mandated policies and procedures, such as anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics reporting system, and other processing in connection with the establishment and defense of legal claims.
- Conducting corporate audit, analysis, and consolidated reporting.
- Enforcing our contracts and protecting Beckhoff, our workers, our clients and their employees and the public against injury, theft, legal liability, fraud or abuse, to people or property.
- As needed for de-identifying the data or creating aggregated datasets, such as for consolidating reporting, research, or analytics.
- Making back-up copies for business continuity and disaster recovery purposes, and other IT support, debugging, security, and operations.
- Operating, analyzing, upgrading, enhancing, developing, or improving internal IT or other services, operations, and similar matters.
- Facilitating corporate governance.

## DATA ADMINISTRATION

### SECURITY

We implement and maintain commercially reasonable security measures to secure your Personal Information from unauthorized processing. WHILE WE ENDEAVOR TO PROTECT YOUR PERSONAL INFORMATION AGAINST UNAUTHORIZED ACCESS, USE, MODIFICATION, AND DISCLOSURE, WE CANNOT GUARANTEE THAT ANY INFORMATION, DURING TRANSMISSION OR WHILE STORED ON OUR SYSTEMS, WILL BE ABSOLUTELY SAFE FROM INTRUSION BY OTHERS.

### RETENTION AND DISPOSAL

Beckhoff intends to retain Personal Information or Sensitive Personal Information (as defined above) for no longer than is reasonably necessary and proportionate to achieve the legitimate business purpose for which it was collected or to satisfy a legal requirement. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established or necessary under applicable law;
- Industry and human resources best practices;
- Purpose of processing and whether it is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- Costs associated with continued processing, retention, and deletion.

Beckhoff staff must follow any applicable records retention schedules and policies and destroy any media containing Personal Information or Sensitive Personal Information in accordance with applicable company policies. Personal Information shall not be further processed in a manner that is incompatible with these purposes.

## YOUR RIGHTS AND CHOICES

### YOUR CALIFORNIA PRIVACY RIGHTS

Under the California Consumer Privacy Act (“**CCPA**”) or other comprehensive state privacy laws, you may have the following rights, subject to your submission of an appropriately verified request (see below for verification requirements):

<i>Right to Know</i>	You may request any of following, for the 12 month period preceding your request: (1) the categories of Personal Information we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Information was collected; (3) the business or commercial purpose for which we collected, sold or shared your Personal Information; (4) the categories of third parties to whom we have sold or shared your Personal Information, or disclosed it for a business purpose; and (5) the specific pieces of Personal Information we have collected about you.
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<i>Right to Delete</i>	You have the right to delete certain Personal Information that we hold about you, subject to exceptions under applicable law.
<i>Right to Correct</i>	You have the right to correct certain Personal Information that we hold about you, subject to exceptions under applicable law.
<i>Right of Non-retaliation</i>	You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.
<i>Opt-Out of Sale or Sharing</i>	We do not sell or share HR Personal Information with third parties in exchange for monetary or other valuable consideration or for cross-context behavioral advertising.
<i>Minors</i>	To the extent we have actual knowledge that we collect or maintain Personal Information of a minor under age 16, those minors between the age of 13 and 16 must opt in to any sharing of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sharing of personal information (as defined under CCPA). All minors have the right to opt-out later at any time. Minors under age 13 may have other rights under the Children's Online Privacy Protection Act ("COPPA").

**SUBMISSION OF REQUESTS**

Please contact us at the email address listed below for assistance with your privacy requests. For all other questions or comments about this Applicant Privacy Notice or our privacy practices, please contact us as follows:

Re: HR Data Rights Requests  
[beckhoff.usa@beckhoff.com](mailto:beckhoff.usa@beckhoff.com)  
 1-877-894-6228

**VERIFICATION OF REQUESTS**

Requests to receive a copy of Personal Information, and requests to delete or correct Personal Information, must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Information. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as that you provide an address, phone number, or other data we have on file, to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.