



European Union (EU) Employee Privacy Policy

Effective: May 25, 2018

Overview

The privacy and security of the Personal Data collected from employees is a priority to Riverbed Technology, Inc., our affiliates and subsidiaries (“**Riverbed**”, “**we**”, “**us**” and “**our**”). It is equally important to us that our employees understand how we handle Personal Data.

Riverbed has issued this Privacy Policy for Employees in the European Union (the “**Employee Privacy Policy**”) to explain how Riverbed handles Personal Data about employees residing in the European Union.

What Personal Data Do We Collect?

“**Personal Data**” means any data about an identified or identifiable natural person regardless of whether it is held in paper, electronic or any other format, including:

- **Identification Data**, e.g., name, personal address, personal telephone number, personal email address, date of birth, national insurance number, photograph, marital/dependent status and emergency contact information;
- **Information Concerning Employment**, e.g., salary, work and compensation history, planned salary, earnings, career development, paid time off, salary grade, performance information (including performance appraisal, internal communications regarding performance and attendance records), decisions to offer employment, CVs, résumés, applications, employment references and background verification information;
- **Financial Information**, e.g., bank account numbers, tax-related information and salary-related information;
- **Sensitive Personal Data**, e.g., data which may reveal race or ethnic origin (e.g. for employment equality purposes), religious or philosophical beliefs, or trade union membership, or that concerns health; and
- **Other information** necessary for Riverbed’s business purposes which may be voluntarily disclosed by you to Riverbed during your employment with Riverbed.

We collect, process and maintain different types of Personal Data about you in the context of your employment relationship with Riverbed (“**Employee Personal Data**”).

How We Collect Employee Personal Data

Employee Personal Data may be collected or accessed in a number of way, including:

- directly from you whether in writing or verbally (for example during the onboarding process);
- generated by Riverbed in conversations, correspondence, appraisals, etc.;
- received from third parties so that such third parties may administer benefits, payroll or provide other employment-related services on behalf of Riverbed;
- through the use of Riverbed office, computer and telephone equipment, including mobile phone, smart phones and tablet devices, and software, including electronic messaging, email and internet applications.

Telecommunications and Internet

Telephone equipment, email addresses, intranet and internet along with internal social networks are provided by Riverbed for work-related assignments. They are a tool and a company resource. They can be used within the applicable legal regulations and internal company policies. In the event of authorized use for private purposes, the laws on secrecy of telecommunications and the relevant national telecommunication laws will be observed, if applicable.

To defend against attacks on the IT infrastructure or individual users, protective measures may be implemented for the connections to the Riverbed network that block technically harmful content or that analyze the attack patterns. For security reasons, the use of telephone equipment, email addresses, the intranet/internet and internal social networks can be logged. Evaluations of this data from a specific person shall be made only in a justified case of suspected violations of laws or Riverbed policies, or as required by a valid court order or subpoena. The evaluations shall be conducted only by investigating departments while ensuring that the principle of proportionality is met. The relevant national laws will be observed in the same manner as Riverbed policies.

How We Use the Employee Personal Data We Collect

Riverbed will not process Employee Personal Data for purposes other than the Employment Purposes (as set out below) without first informing you and giving you the opportunity to object to such processing.

Riverbed will not process Employee Personal Data that qualifies as Sensitive Personal Data for purposes incompatible with those given in this Employee Privacy Policy unless you have explicitly consented to the processing or the processing is:

- necessary for administering justice or for exercising statutory, governmental, or other public functions;
- necessary for the establishment of legal claims or defenses;
- in your vital interests or those of another person;
- required to provide medical care or diagnosis; or
- necessary to carry out Riverbed's legal obligations in the field of employment law.

"Employment Purposes" means

- **Personnel Management** including but not limited to the normal business practices related to the establishment, maintenance and termination of employment relationships, for example, your application for employment, hiring, your role and function at Riverbed, employee management and administration generally (including both during and after employment), employment verification, administering benefits, administering personal short or long term compensation programs, conducting disciplinary proceedings, addressing labor relations issues and processing health insurance claims.
- **Operations Management** including but not limited to establishment, performance and management of Riverbed business activities, for example, maintaining and monitoring usage of internal networks and IT systems;
- **Security Management** including but not limited to ensuring the security of Riverbed's premises and information held by Riverbed as well as the safety of Riverbed employees;
- **Legal and Regulatory Compliance** including but not limited to obtaining and releasing Employee Personal Data as required by law (e.g. tax, health and safety, anti-discrimination laws) or judicial authorization and to maintain records that can include Personal Data, such as government identifiers, information relating to sickness, maternity or parental leave, pension and retirement.

Riverbed will process only Employee Personal Data that is relevant taking into account the Employment Purposes for which it is to be processed. Where processing of Personal Data is not for Employment Purposes, Riverbed will obtain your consent prior to the processing. Riverbed will not process Personal Data more than necessary in the circumstances.

Sharing of Employee Personal Data

Your Employee Personal Data may be shared as follows:

- Where you request us or provide your consent to us.
- **Riverbed Affiliates and Subsidiaries:** we share Employee Personal Data among Riverbed affiliates, subsidiaries and parent companies where such entities need to process Employee Personal Data for business or business efficiency purposes (“Intra Company Transfer”). Riverbed will ensure that it will protect any Employee Personal Data subject to an Intra Company Transfer in accordance with applicable law.
- **Vendors and Agents:** we may share Employee Personal Data with Riverbed’s contracted vendors and agents working on our behalf to provide services which require the processing of that Employee Personal Data, including in connection with providing many of the benefits and services we offer our employees (e.g., human resources information systems, financial investment service providers, wellness program service providers, insurance providers). In such cases, these vendors and agents must abide by our data privacy and security requirements, are not allowed to use Employee Personal Data they receive from us for any other purpose, and we require them to agree to maintain the confidentiality of Employee Personal Data.
- **Business Transfers:** In some cases, we may choose to buy or sell assets or become involved in a merger, acquisition or similar transaction. In these types of transactions, employee information (that may include Employee Personal Data) is typically one of the assets that is transferred.
- **Protection of Riverbed and Others:** We may disclose or share Employee Personal Data and other information, if we believe in good faith that such disclosure or sharing is legally required, or is necessary to protect our legal rights (including, but not limited to, our intellectual property rights and enforcement of our agreements), the legal rights of others, or the safety and/or security of Riverbed, our employees, or other individuals.

Protection of Employee Personal Data

Riverbed will use appropriate administrative, technical, personal and physical measures to safeguard Employee Personal Data against loss, misuse, unauthorized access, theft, modification, disclosure and destruction. Riverbed will restrict access to Employee Personal Data under its control to those Riverbed employees, agents and contractors who have a legitimate business need for such access.

Riverbed will provide training to employees and third parties where relevant to promote awareness of Riverbed’s requirements and policies surrounding protection and security of Employee Personal Data.

Access to Employee Personal Data We Collect

You can ask to see the Employee Personal Data in our possession. To do so, please follow the instructions set forth in the Section entitled “Requests to Access, Delete or Correct Information”.

With limited exceptions, you will be permitted to review and, where in accurate, correct Employee Personal Data. Your right to access the Employee Personal Data that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the Employee Personal Data that we hold about you. In addition, the Employee Personal Data may have been destroyed, erased or made anonymous. In the event that we cannot provide you with access to your Employee Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Correction of Collected Employee Personal Data

We endeavor to ensure that Employee Personal Data in our possession is accurate, current and complete. If you believe that the Employee Personal Data about you is incorrect, incomplete or outdated, you may request a revision or correction of that information. If it is determined that Employee Personal Data is inaccurate, incomplete or outdated, we will use reasonable efforts to revise it and, if necessary, use reasonable efforts to inform agents, service providers or other third parties, which were provided with inaccurate information. We reserve the right not to change any Employee Personal Data we consider is accurate.

Retention of Collected Employee Personal Data

Except as otherwise permitted or required by applicable law or regulatory requirements, we may retain your Employee Personal Data only for as long as we believe it is necessary to fulfill the purposes for which the Employee Personal Data was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

You may request that we delete the Employee Personal Data about you that we hold. There are instances where applicable law or regulatory requirements allow or require us to refuse to delete this Employee Personal Data. In the event that we cannot delete your Employee Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Requests to Access, Correct or Delete Employee Personal Data

You may request to access, correct, amend or delete inaccurate personal data by submitting a request [here](#).

Any request by you to us to delete your Employee Personal Data will not result in deletion of any information submitted by you to a third-party provider. If you require the third-party to delete any of your Employee Personal Data, you must contact the third party directly to request such deletion.

Applicability of Other Riverbed Privacy Policies

Your use of Riverbed's website (www.riverbed.com) and any Riverbed products and services is governed by any applicable terms and our general [Privacy Policy](#).

If you are unsure how of if this Employee Privacy Policy applies to you, please contact your Human Resources representative.

Third Party Services

In some cases, you may provide Personal Data to third parties that Riverbed works with. This could be, for example, a third-party website where you can take advantage of services made available to our employees, or can manage stocks. The use of such third-party websites may be governed by separate terms of use and privacy policies which are not under our control and are not subject to this Employee Privacy Policy. Please contact such third parties for questions regarding their privacy practices, as well as if you would like to have them delete your Personal Data.

Resolving Concerns

If you have any questions or concerns regarding the handling of your Employee Personal Data please contact your local Human Resources representative. Alternatively, you may report concerns or complaints to the Legal Department at rvbd-privacy@riverbed.com.