



# Sprinklr Applicant Privacy Notice

**Last Updated: April 1, 2025**

Hello! Thank you for taking the time to look at Sprinklr's Applicant Privacy Notice ("**Applicant Notice**") and for inquiring, applying for, thinking about, or expressing an interest in an opportunity with us. Sprinklr, Inc. and its affiliates (collectively, "Sprinklr") are committed to fair practices that protect your personal data. Sprinklr's corporate values include doing the right thing and passionately, genuinely caring, and these values also apply to our processing of your personal data when you engage with us. Our values are at the core of our business model, and we develop our strategies, processes and culture with those values, and your privacy, in mind.

This Applicant Notice is intended to clearly and transparently explain what personal data we collect, how we collect it, and what we do with it when you engage with us in connection with our online and offline recruiting activities. We encourage you to review this Applicant Notice and revisit it often, in case we make any changes to it. If you can't find what you are looking for, please let us know by emailing us at [privacy@sprinklr.com](mailto:privacy@sprinklr.com).

## Definitions

To make this Applicant Notice concise and avoid repetition, we will use the following terms (these terms apply whether used in the singular or plural and whether capitalized or not):

**"GDPR"** means the EU General Data Protection Regulation. Reference to the GDPR in this Applicant Notice includes the UK General Data Protection Regulation.

**"Candidate Portal"** means the Sprinklr Candidate Portal, which is powered by Workday, Inc., and which allows individuals to create and manage accounts, review Sprinklr Opportunities, apply for open roles, and track application status.

**"Personal Data"** means any information that can be used to identify you.

**"Opportunity"** means the job, role, position, contract, apprenticeship, placement, internship, vacancy, work, or employment you are interested in.

**"We" "Us" "Our" or "Sprinklr"** means Sprinklr, Inc. 441 9<sup>th</sup> Avenue, 12<sup>th</sup> Floor, New York, NY 10001, USA and our affiliated or group companies.

**"Websites"** means the web pages hosted by Sprinklr to which this Applicant Notice applies, including the Candidate Portal.

**"You" or "Your"** means you (the person reading this), i.e. employees, prospective employees, staff, contractors, trainees, interns, apprentices, officers, consultants, work experience students, and temporary or agency workers or the individual whose personal data is being processed by Us.



## When does this Applicant Notice apply?

This Applicant Notice explains how we process your Personal Data when you have engaged with Sprinklr as part of an Opportunity. For the purposes of this Applicant Notice, Sprinklr is the data controller because we are responsible for deciding how your Personal Data is processed.

This Applicant Notice does not cover Personal Data that is processed when you access third party sites through our Websites. Third-party websites are governed by the terms applicable to your relationship with that third party and their privacy policy will outline how your personal data is used. Sprinklr accepts no responsibility or liability for third-party websites.

## What Personal Data does Sprinklr process?

The types of Personal Data we process depends on your engagement with Sprinklr, but please note that we cannot engage with you for an Opportunity or take you through the application process without processing your Personal Data. The Personal Data we collect about you comes from three sources:

**Information You Provide.** When you engage with us for an Opportunity, whether directly or through an agent, or through an interaction with our Websites (including [www.sprinklr.com/careers](http://www.sprinklr.com/careers)), we process the Personal Data that you provide to us, including Personal Data you provide when using our Websites to get more information about Sprinklr (you should also refer to [www.sprinklr.com/privacy](http://www.sprinklr.com/privacy) for information about how we process your Personal Data when browsing our Website), to subscribe to our content, to attend our events, or to apply for Opportunities. It may also include Personal Data you provide to us through the Candidate Portal so that you can set up and authenticate an account as part of the application process. This includes but is not limited to:

- Contact information, such as your name, email address, mailing address, and phone number;
- Your geographic location so that we can tailor our application and communications regarding Opportunities;
- Information about any potential prior or existing relationship with Sprinklr;
- Employment and educational information, such as your professional background, work history, prior experience, CV or resume, references, education details, certifications or other qualifications, languages spoken, relevant skills, and links to websites or social network URLs, hobbies and interests;
- Candidacy information, including preferences regarding relocation, prior experience with the Sprinklr platform, any information that may be required to document and demonstrate work authorization requirements, as well as any other preferences or needs regarding your candidacy for the Opportunity;
- Recordings of screening interviews; and
- If relevant to your jurisdiction, application or circumstances and if you choose to provide it, voluntary disclosures, or accessibility needs.

**Information We Get When You Interact with our Website or Candidate Portal.** When you engage with us for an Opportunity, we may also collect Personal Data automatically such as:

- Usage information, such as how you interact with our services, what pages you visit, the date and time of your visit, which features and tools you access, access times, and what actions you took on our Websites;



- Device information, such as your hardware and software, operating system, unique identifiers, including unique device identifiers, and IP addresses;
- Location information; and
- Information collected via [Cookies and Similar Technologies](#).

**Information We Get From Third Parties.** We may collect information about you from other individuals, affiliates, or third parties. This includes:

- Information obtained as part of a pre-employment screening check;
- Information from any agencies or recruitment consultants whom you have a relationship with;
- Information from previous employers, educational establishments, or other entities with whom you have a prior professional or educational relationship for the purpose of providing a reference or verifying your application;
- Information from individuals or organizations you name as referees;
- Information from public sources, including public forums, information made publicly available on social media networks or other websites, or government entities that maintain public records; and
- Information we get if we acquire or merge with another entity.

## Why does Sprinklr process your Personal Data?

We process your Personal Data to engage with you for the purposes of fulfilling our recruitment practices, and provide you with a seamless application process, and to enable you to explore and apply for Opportunities with Sprinklr. Our processing of your Personal Data may be for the following purposes:

- Providing, operating, delivering, improving, creating and maintaining our Websites, application process, and recruitment and candidate selection strategy;
- Managing our relationship with you during the application process including inviting you for interviews, hosting you, or providing access to Sprinklr or our programs, either virtually or at our premises;
- Communicating with you, including responding to your application for Opportunities or other inquiries about Sprinklr, following up on your requests for information, communicating with you about future Opportunities, and sending you communications relating to any applications you have submitted or your suitability for any Opportunity;
- Improving, developing and maintaining our processes, Candidate Portal, and Websites, including repairing and addressing bugs, troubleshooting, and analyzing performance trends and usage to enhance the application process or our Websites;
- Monitoring and enhancing the safety and security of our Websites and recruitment practices to address suspicious behavior, fraud, and to maintain the integrity of our recruiting processes;
- Meeting our legal obligations and enforcing violations of our terms (such as the Sprinklr Candidate Portal Terms and Conditions) or other policies if required; and
- Any other legitimate business purposes (always balancing our interests against yours).

Our processing includes both manual (human) and automated (computerized) methods which support each other. This does not mean that Sprinklr makes automated decisions about you during the recruitment process. We may combine or enhance your Personal Data with data obtained from third party sources that are permitted to share that data with us for the purposes stated within this Notice.



## How does Sprinklr share your Personal Data?

We do not give, sell, or otherwise distribute your Personal Data to third parties outside of Sprinklr, unless we have informed you or where legally required you have consented, or where the third party is a service provider for us, or where this is necessary and in accordance with applicable law. The circumstances in which your information may be shared include:

- **Affiliates:** We may share your information with Sprinklr affiliates;
- **Authorized Parties:** We share your information with authorized thirdparty vendors and service providers which support our business operations or the application process, as well as our professional advisors, insurers, or auditors;
- **Legal Purposes:** We may disclose personal data in response to legal demands such as subpoenas, court orders, law enforcement requests, legal claims, or government inquiries, to detect fraud, or to protect the rights, interests, safety, and security of Sprinklr or the public.
- **Business Transfers:** We may share your personal data in connection with corporate transactions, such as sales, mergers, or consolidations;
- **With your Consent and Instruction:** We will also share information where you have consented to such sharing (e.g., with recruitment consultants you have a relationship with).

Where we share your personal data, we enter into written agreements with the recipient which contain data protection obligations no less protective than those in this Applicant Notice or our Data Protection Addendum, if applicable. Sprinklr's Candidate Portal is powered by Workday, Inc., who is a Service Provider and Authorized Party for Sprinklr., and Sprinklr has a written agreement in place with Workday to safeguard the processing of any Personal Data. You may find Workday's privacy notice [here](#).

## What rights do you have in relation to your Personal Data?

Where, in the course of the application process for an Opportunity, Personal Data is not required and your provision of it is optional, you can choose not to share it. There are other instances, however, where we require Personal Data to process your application and consider your candidacy for an Opportunity. You can decline to provide that Personal Data if you'd prefer not to, or request deletion of that data, but that may mean we cannot have a relationship or consider your application or candidacy for an Opportunity. We are happy to discuss this with you to find a solution, if possible.

In accordance with applicable data protection laws, you, as a data subject, also have the right to exercise certain rights, such as obtaining a copy of the personal data held about you, requesting deletion of your data, restricting the processing of your personal data, opting out of future communications, or objecting to or withdrawing consent for processing (where relevant). To exercise any of these rights, you can submit a request on our [Security & Privacy request page](#) or email us at [privacy@sprinklr.com](mailto:privacy@sprinklr.com). You can also unsubscribe from email communications using the "unsubscribe" link at the bottom of each communication.

In addition to the rights and choices listed above, you may also have the right to lodge a complaint with a supervisory authority in your state or country of residence. In the United States, Sprinklr is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and, depending on your state of residence, you may also be able to submit complaints with your state Attorney General's office. If you are visiting our website from the EU, you can lodge a complaint with the [supervisory](#)



[authority](#) in your country of residence. If you need information about how to exercise your rights, please email [privacy@sprinklr.com](mailto:privacy@sprinklr.com) and we will do our best to help.

## How Long does Sprinklr Retain your Personal Data?

Sprinklr will retain your Personal Data to evaluate your application for the Opportunity and to comply with applicable laws related to the evaluation of candidates. If you are hired for an Opportunity at Sprinklr, your application information becomes part of your employment record and Sprinklr may use it in connection with your employment consistent with Sprinklr's Employee Privacy Notice.

If you are not hired for an Opportunity, you withdraw from the Opportunity, or you decline Sprinklr's offer, Sprinklr will keep your application for a period of time after your application to comply with applicable law (such as, for example, a legal challenge with respect to a recruiting decision), to consider you for other current or future Opportunities at Sprinklr (unless you request that we do not), and to help us better analyze, understand, and improve upon our recruiting processes.

Note that Sprinklr may be required to retain certain information where required by law or where necessary to protect ourselves from legal claims.

## Is your Personal Data secure?

Sprinklr uses industry standard technical, organizational, and administrative security measures to protect any Personal Data we hold in our records from loss, misuse and unauthorized access, disclosure, alteration, and destruction.

We ensure that all staff and employees who have access to Personal Data about you have received adequate training and all employees who are permitted to handle Personal Data are subject to confidentiality obligations and Sprinklr's access control policies.

## Does Sprinklr process children's Personal Data?

Sprinklr does not direct any of our business practices, opportunities or Websites, directly or indirectly, towards children. While we are not aware of any collection of children's personal data and the processing of such personal data is prohibited by our Acceptable Use Policy, we remain committed to respecting the privacy of children online and ensuring that Sprinklr is compliant with the Children's Online Privacy Protection Act (COPPA) and other applicable laws. **For more information, please see the "Minors" section of our [Privacy Notice](#).**

## Equal Employment Opportunities

### Applicants and Candidates from the United States

In compliance with the Office of Federal Contract Compliance Programs (OFCCP) requirements, we may ask for gender, ethnicity, disability, and veteran status information from U.S. applicants as part of the



application process. This data will only be collected for the purpose of equal opportunity monitoring as required by OFCCP and not used for any other purpose, in a way that can identify you. This information may also be shared with external equality and diversity auditors, customers, investors, or partners but only in an aggregated and de-identified way.

### **Applicants from the European Economic Area and United Kingdom**

You may be asked to provide equal opportunity information. This is not mandatory – if you choose not to provide it, it won't affect your application. We won't make the information available to anyone outside our recruitment team, including hiring managers, in a way that can identify you. Any information you provide will be used solely to produce and monitor equal opportunities statistics. This information may also be shared with external equality and diversity auditors, customers, investors or partners but only in an aggregated and de-identified way. Please note that:

- If you provide Sprinklr with any information about reasonable adjustments you may require under the Equality Act of 2010, we will rely on Article 6(1)(c) as the lawful basis for processing this information: to comply with our legal obligations under the Equality Act.
- If you provide Sprinklr with any special category data, such as health, religious, or ethnicity data, we will rely on article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. We will also rely on Schedule 1 part 1(1) of the DPA2018 which relates to processing for employment purposes, too.

Finally, please note that we may process information about applicant criminal convictions and offenses to, for example, conduct a background check. The lawful basis we rely on to process this data is Article 6(1)(e) for the performance of our public task, as well as the processing condition at Schedule 1 part 2 paragraph 6(2)(a).

## **Where is your Personal Data processed?**

When you use the Website or Candidate Portal, apply an Opportunity with Sprinklr, or otherwise engage in the recruitment and application process, the Personal Data that we collect may be processed, stored, and used in the United States and other jurisdictions.

The data protection laws of the countries to which we send Personal Data may vary from those in your country of residence. When we transfer information outside of your country of residence, we ensure that there is an adequate transfer mechanism in place, such as standard contractual clauses and additional safeguards if legally required. We also make sure that any recipients of that information, especially thirdparty recipients, have an adequate transfer mechanism in place as well. You can find more information on the categories of third parties with whom we share data [here](#).

Sprinklr, Inc. 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. Sprinklr, Inc. has certified to the U.S. Department of Commerce that it (a) adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF; and (b) that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF.



If there is any conflict between the terms in this Applicant Notice and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit [dataprivacyframework.gov](https://dataprivacyframework.gov).

If you have a question or complaint about Sprinklr's participation in the Data Privacy Framework, you can reach out to [privacy@sprinklr.com](mailto:privacy@sprinklr.com) or submit an anonymous report [here](#). In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Sprinklr, Inc. commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data 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 in the context of the employment relationship. As noted in the Data Privacy Framework Principles, binding arbitration is available to address residual complaints. Sprinklr is subject to the investigatory and enforcement powers of the United States Federal Trade Commission (FTC).

## Cookie Notice

Sprinklr uses cookies (including third party cookies) (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons, pixels, tags, and scripts) to uniquely identify your browser and to gather information about how you interact with the Websites. Both Sprinklr and Workday, Inc. use cookies to provide, protect, and improve the Websites and Candidate Portal, including to:

- Assist you in navigating our sites and improve your experience;
- Review your registration, log-in, and ability to provide feedback;
- Analyze your use of the Website; and
- Help us keep our Websites safe and secure.

You can manage your cookie preferences in the following ways:

- Making changes through your "Cookie Preferences;"
- Controlling cookies on your browser, which you can learn about [here](#); or
- Managing your cookie preferences directly with third party partners such as [Google](#).

Note that if you use multiple browsers on your device, you will need to instruct each browser separately on your cookie preferences. Limiting cookies is subject to each browser's settings and limitations, and some features of our Websites may not work if you decline the use of cookies. You can also find more details on Workday's cookie policy [here](#).

## Supplemental Notice for EU and UK applicants

This Supplemental Privacy Notice for individuals in the European Economic Area (EEA) and UK (the "**EEA/UK Notice**") supplements the information included in the Applicant Notice and applies to individuals from the EEA and UK. All terms used in this EEA/UK Notice have the same meaning as set out in the EU General Data Protection Regulation and the UK General Data Protection Regulation (collectively, the "**GDPR**").





### **What is Sprinkl's lawful basis for processing your personal data?**

Sprinkl is committed to the fair, transparent and lawful processing of your Personal Data and relies on a variety of legal bases for collecting and using Personal Data, including:

- Where the processing is in our legitimate interest and is not overridden by your rights and freedoms;
- Where we have obtained your consent to do so. When we rely on consent, you may withdraw your consent at any time (though withdrawal of consent does not impact the lawfulness of processing based on consent prior to its withdrawal);
- As necessary to perform our contractual obligations to you, or take steps at your request before we enter into a contract with you; or
- Where we have a legal obligation to process Personal Data.

If we are processing your Personal Data for the purpose of performing or entering into a contract with you, and you ask us to stop processing your Personal Data, we may be unable to enter into that contract with you.

In some circumstances, by the very nature of your engagement with us during the application process, we may process sensitive Personal Data. In these circumstances, we will do so either because you have given your explicit consent or because it is necessary in accordance with Article 9(2)(b) of the GDPR i.e., for purposes of employment, social security and social protection law or it is necessary or your/our obligations and rights in the field of employment and social security and social protection law.

Purpose for processing	Lawful basis for processing
Providing, operating, delivering, improving creating and maintaining our Website, application process, and recruitment and candidate selection strategy	Legitimate interests of managing and maintaining our application processes and procedures as well as workforce planning.
Managing our relationship with you during the application process including inviting you for interviews, hosting you, or providing access to Sprinkl or our programs, either virtually or at our premises.	Legitimate interests of carrying out recruitment practices to assess and select candidates; Performance of a contract.
Communicating with you, including responding to your application for Opportunities or other inquiries about Sprinkl, following up on your requests for information, communicating with you about future Opportunities, and sending you communications relating to any applications you have submitted or your suitability for any Opportunity.	Legitimate interests of pursuing recruitment; Performance of a contract.
Improving, developing and maintaining our processes and Websites, including repairing addressing bugs, troubleshooting, and analyzing performance trends and usage to enhance the application process or our Websites;	Legitimate Interests of ensuring the safety and protection of our systems and data.





Monitoring and enhancing the safety and security of our Websites and recruitment practices to address suspicious behavior, fraud, and to maintain the integrity of our recruiting processes.	Legitimate interests to ensure the safety and integrity of our systems and workforce.
Meeting our legal obligations and enforcing violations of our terms or and other policies if required and complying with equality and diversity requirements.	Legal obligation
Any other legitimate business purposes (always balancing our interests against yours).	Legitimate interests such as improving our business, workforce planning or operational strategy.

### **EU and UK Representatives**

The GDPR requires non-EU entities to have an EU Representative when offering goods and services in the EU, or processing personal data of individuals in the EU:

- Sprinklr's EU Representative: Sprinklr Germany, c/o Turnbull & Irrgang GmbH, Bleichenbrücke 9, 20354 Hamburg, Germany.
- Sprinklr's UK Representative: Sprinklr UK Ltd., 123 Victoria St, Westminster, London SW1E 6RA, UK.

Both can be contacted by email at [privacy@sprinklr.com](mailto:privacy@sprinklr.com).

## **Supplemental Privacy Notice for California Residents**

This Supplemental Privacy Notice for California Residents (the “**CA Notice**”) supplements the information included in this Applicant Notice and applies solely to individuals who reside in the State of California. All terms used in this CA Notice have the same meaning as set out in the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act (CPRA).

### **Sprinklr's Information Practices**

To provide you with our Websites, we process information about you which may include Personal Information, as defined under California law. You can learn more about what kind of information we collect and how we use it in our Applicant Notice, above, but the following is a summary of the California specific categories of Personal Information we collect and, depending on our Websites, how we use it or share it:



Categories of Personal Information (if they are provided)	Examples of how Sprinklr uses Personal Information	Parties with Whom the Categories of Personal Information May Be Shared
<ul style="list-style-type: none"><li>• Identifiers</li><li>• Commercial information</li><li>• Internet or other electronic network activity information</li><li>• Location related information</li><li>• Audio or visual information</li><li>• Professional or employment information</li><li>• Education information</li><li>• Financial information</li><li>• Information Derived from other Personal Information</li><li>• Diversity, equality and inclusion data</li></ul>	<ul style="list-style-type: none"><li>• To provide our Websites and services to you, including the application processes</li><li>• To manage our relationship with you during the application process and to communicate with you</li><li>• To promote the safety and security of our Websites and recruiting and applicant processes</li><li>• To improve our workforce and recruitment strategy</li><li>• To ensure compliance with law for equal opportunities and other purposes</li></ul>	<ul style="list-style-type: none"><li>• Sprinklr Affiliates</li><li>• Sprinklr Customers</li><li>• Service Providers</li><li>• New Owners in the event of a change of ownership or control of all or part of our Products or assets</li><li>• Law Enforcement or other third parties in connection with legal requests, as needed to comply with applicable law, or to prevent harm</li><li>• Investors, partners, customers, auditors, professional advisors, accountants, and bookkeepers</li></ul>

### **Your Rights and Choices**

California residents have specific rights regarding their Personal Information, including the right to request disclosure about our collection, use, and disclosure of your Personal Information. Depending on the nature of your request, our response may provide you with information about:

- The specific pieces of Personal Information we collected about you, including, under certain circumstances, in a portable format.
- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- The categories of your Personal Information that we disclosed for a business purpose.
- The categories of third parties with whom we disclosed that personal information for a business purpose.
- Our business or commercial purpose for collecting or disclosing that Personal Information.

CA residents may also request deletion of their Personal Information. The CCPA also provides a right to opt out of the sale of your Personal Information. We do not sell Personal Information. To exercise your options with respect to cookies use the “Cookie Preferences” link on the banner at the bottom of our Websites.

### **Exercising Your Rights**

To exercise your rights, you can either:



- Submit a request on our [Security & Privacy request page](#); or
- Email us at [privacy@sprinklr.com](mailto:privacy@sprinklr.com)

You can also opt out of marketing communications at any time by clicking the 'unsubscribe' link in the marketing emails you receive.

### **Other California Privacy Rights**

Under California's "Shine the Light" Law (Civil Code Section § 1798.83), users of our Websites who are California residents can request certain information regarding disclosures of Personal Information to third parties for direct marketing purposes. Specifically, individuals who are California residents can request: (a) a list of the categories of Personal Information disclosed by Sprinklr to third parties during the preceding calendar year for Sprinklr's own direct marketing purpose; and (b) a list of the categories of third parties to whom Sprinklr disclosed that information. To make such a request, please reach out to [privacy@sprinklr.com](mailto:privacy@sprinklr.com). Note that additional information may be required to authenticate your identity, and we are only obligated to respond to such requests once during the calendar year.

## **Updates to this Applicant Notice**

We may update this Applicant Notice from time to time. Where appropriate or required by law, we will notify you about the new Applicant Notice by posting appropriate notice on our website and we will revise the date at the top of this Applicant Notice when such changes are made so you know when the Applicant Notice was last modified.

## **Contact Sprinklr or Sprinklr's Data Protection Officer**

If you have any questions about this Applicant Notice, or if you wish to exercise your rights under applicable data protection laws, please contact us by:

- Sending us an email at [privacy@sprinklr.com](mailto:privacy@sprinklr.com)
- Submitting an inquiry through our [Privacy and Security form](#); or
- Writing to us at **Sprinklr, Inc., ATTN: Privacy, 441 9<sup>th</sup> Avenue, 12<sup>th</sup> Floor, New York, NY 10001, USA**

Sprinklr has also appointed a Data Protection Officer, VeraSafe, who can be contacted at 100 M Street S.E., Suite 600, Washington, D.C. 20003, USA, or at [privacy@sprinklr.com](mailto:privacy@sprinklr.com).