



Applicant and Candidate Privacy Notice

This Applicant and Candidate Privacy Notice (the “**Notice**”) applies to The Dow Chemical Company (“**TDCC**”) and its direct and indirect global subsidiaries and controlled affiliates (where TDCC owns more than 50 per cent of the voting rights or has the right to control the entity), including any TDCC subsidiary listed in Exhibit 21 of Dow Inc.’s most recent Form 10-K report filed annually with the U.S. Securities and Exchange Commission (collectively, the “**Dow Companies**”; each a “**Dow Company**”).

The Dow Company that is seeking to hire the successful candidate and/or communicating with you (referred to herein as “**Dow**” or “**we**” or “**our**”), is responsible for the processing of your personal data and controls how it is used, in accordance with this Notice. For applicable data protection law, that Dow Company is the primary controller of your data; other Dow Companies may also receive and process your personal data, in the capacity of controller, and this Notice applies equally to them.

This Notice explains why and how we collect personal data about you, how we process such data, and what rights you have regarding your personal data.

Our applicant tracking system

We use an applicant tracking system (the “**ATS**”) to manage the personal data of our applicants and candidates. The ATS is provided to Dow by a third party, [Workday, Inc.](#) (“**Workday**”), in accordance with the service agreement between Dow and Workday. Workday acts as a processor in this context, processing personal data on Dow’s behalf; Dow is the controller. Dow’s Workday tenant data is stored in a Workday data center located in the United States.

The personal data we process

We may process all or certain of the following categories of personal data, depending on the location of the job to which you apply, the country in which you reside, applicable law, your choices, and other relevant circumstances of your application or candidacy for employment with Dow. The categories listed below may not include all categories of personal data we process in connection with the ATS.

- *Personal, identification, and contact data, such as:* your name; sex; contact information (including mailing address, phone number(s), and email address); date, city, and country of birth; photo; citizenship and nationality.
- *Skill and experience data, such as:* your resume/CV; education records; work history (including current and previous positions); experience level; qualifications, certifications, training courses, and achievements; work status; languages; contact details of referees and results of capability assessments and interview assessment/feedback and any other personal information you choose to disclose to us as part of your job application.



- *Candidate assessment data, such as:* your assessment performance data; assessment score; assessment ranking; phone, video, and in-person interview content (and, if applicable, recordings or transcripts thereof); strengths and weaknesses; interview evaluations, feedback, and notes.
- *Recruiting data, such as:* the recruiting source platform you used to find and view the job opening and apply for the position; referral information; travel preferences; the jobs for which you have applied; open requisitions; career interests and goals; legal eligibility to work in a certain country; and background investigation (only if permitted, or required, by applicable law).
- *Social media data, such as:* your profiles, posts, and other information you disclose to us or on publicly available social media platforms (e.g., LinkedIn). There is an optional field in our ATS that permits you to link to your social media profile. We don't otherwise seek to monitor or vet an applicant's or candidate's publicly available social media accounts as part of our recruiting process. However, it is possible that we could be made aware of this information by you or a third party (e.g., in the context of a corporate investigation or lawsuit).
- *Electronic identification data and information collected by the communications systems, IT applications, and website browser, such as:* IP address; the source of your site visit; webpage views and time spent on the website or a particular page; links clicked; comments shared; emails opened; browser type; date and time of visit; cookies; digital alias/signature; login credentials; log files.
- *Data necessary for the employment contract conclusion and onboarding process (of successful candidates only),* such as the applicable personal identity number (tax, citizenship, social security, national identification, or possibly other type of individual number applicable for you due to your country); data of your related persons (name of spouse/partner, children, etc.); signature; bank account details; emergency contact(s); insurance data; driving license number; training records; clothing and shoe size where necessary.
- *Demographic information and sensitive personal data, such as:* your personal data revealing racial or ethnic origin, political opinions/affiliation, religious or philosophical beliefs, or trade union membership; genetic data (including family medical history), biometric data (for the purpose of uniquely identifying you), data concerning health (including disability); data concerning your sex life or sexual orientation; sex data; preferred pronouns; marital status; social benefits locality; precise geolocation; nationality, citizenship or immigration status; veteran or military service status; and personal data revealing your age. Any medical- or health-related data you provide will be maintained separately by our occupational health provider as part of your occupational



health record and will not be stored in our ATS or otherwise accessible to our human resources personnel, except to the limited extent required by applicable law (e.g., disability status; fitness for work; need for adjustments, accommodations, or support due to a medical condition). **Any category of personal data listed above will not be processed by Dow (or on its behalf) if such processing is prohibited by applicable law.**

- *Dow employee candidate data, such as:* your personal data processed by Dow in connection with your current or former employment with Dow, as described in Dow's Employee Privacy Notice and Privacy Policy for Dow's HR Management Systems (Workday).
- *Additional information you choose to disclose to us during interviews, in written and oral communications, and/or otherwise during the recruitment process, such as:* your personal interests and preferences; personality traits; hobbies and pastimes; activities; community involvement; achievements; volunteer activities; etc.

For more information about the specific categories of your personal data we process, please send a request to the Dow Data Privacy Office at fglpriv@dow.com.

The purposes for which we process your personal data

We may process your personal data for all or certain of the following purposes:

- To contact and communicate with you about your application and the recruitment process. To assess your skills, qualifications, interests, and suitability for the work. To verify your employment and conduct a background investigation (only if permitted, or required, by applicable law). To ask you to provide certain additional personal data and information, which may be required by Dow, by certain third parties acting on Dow's behalf, and/or by applicable law. To evaluate you as a candidate for Dow employment against other qualified candidates. To find the most suitable candidate for the job. To decide whether to offer you employment with Dow.
- To confirm you meet internal and legal requirements relevant to the position. To create and sign the employment contract and other employment documents. To create necessary user accounts for you in our information systems. To provide you access to the Dow premises. To provide mandatory notifications to governmental authorities. To perform the onboarding process and provide you with any equipment, training, and information required for the job. To arrange any mandatory pre-placement medical examinations.
- To maintain records about you, including as required by applicable law. To analyze Dow's hiring practices and outcomes. To improve our application and recruitment process.



- To consider you for (or inform you of) other potential career opportunities at Dow, to which you have not specifically applied. To send you announcements and updates about Dow. To manage our relationship with you. To confirm the accuracy of your contact information.
- To carry out audits, risk and compliance reviews, and regulatory checks to meet applicable legal obligations. To comply with Dow's corporate policies and legal requirements. To investigate alleged violations of applicable law or Dow policies. To respond to complaints, process requests, and defend against legal claims. To manage process quality and insurance.
- To maintain and protect the security of our facilities, services, systems, networks, computers, and information. To prevent and detect security threats, fraud, or other criminal or malicious activities. To manage IT resources and infrastructure, including data back-up, information systems' support and service operations for application management, end user support, testing, maintenance, security (incident/breach response, risk assessment, vulnerability patching), user accounts management, software licenses assignment, security and performance testing, and business continuity.
- To reorganize, acquire and sell activities, business units and companies.
- To improve diversity in our recruiting practices.
- For jobs located outside the United States only:
 - To comply with applicable law, including: (i) by inviting you during the application process to voluntarily self-identify certain demographic data (e.g., your race, ethnicity, sex, citizenship status, nationality, date of birth, and/or disability status), *if and only to the extent permitted or required by applicable law in the jurisdiction where the job to which you applied is located* ("Your Non-U.S. Applicant Self-ID Data"); (ii) by giving deference to Your Non-U.S. Applicant Self-ID Data and not questioning or overriding it based on our visual observation or otherwise; (iii) by ensuring that Your Non-U.S. Applicant Self-ID Data will have no effect on our hiring decisions; and (iv) by maintaining the confidentiality of Your Non-U.S. Applicant Self-ID Data and keeping it separate from your application and inaccessible to our hiring manager and interviewers.
 - To improve diversity in recruiting practices, including by aiming for the candidate slate in the hiring-manager-interview stage to include more than one sex (which aim our recruiters may seek to achieve by generating deidentified reports per recruitment step of the candidate slate's overall percentage of male/female candidates, and potentially expanding the candidate slate with additional qualified candidates without regard to—and without selecting any candidate based on—any



individual candidate's sex).

- To comply with any reporting and record retention requirements under applicable law if we hire and employ you (or otherwise to create a fully inclusive workforce that reflects the world in which we do business), including: (i) by inviting you during the onboarding process to confirm Your Non-U.S. Applicant Self-ID Data (if you chose to provide this to us during the application process), and/or by inviting you during the on-boarding process to voluntarily provide Your Non-U.S Applicant Self-ID Data (if you chose not to provide it during the application process) (collectively, "**Your Non-U.S. Onboarding Self-ID Data**"); and (ii) by pre-populating Your Non-U.S. Applicant Self-ID and/or Your Non-U.S. Onboarding Self-ID Data in our human resources management system (if you chose to provide this to us during the application/onboarding processes), and/or by enabling you to use our human resources management system to self-identify (or change) your demographic data (e.g., race, ethnicity, sex, citizenship status, nationality, date of birth, and/or disability status ("**Your Non-U.S. HRMS Self-ID Data**")).
 - To perform data analysis involving all or certain of Your Non-U.S. Applicant Self-ID Data, Your Non-U.S. Onboarding Self-ID Data, and Your Non-U.S. HRMS Self-ID Data, (collectively, "**Your Non-U.S. Demographic Data**") for research and statistical purposes, which may be distributed both internally and externally to Dow through aggregated and anonymous reports.
 - To manage Dow's Performance Award Program—and measure certain of its performance metric targets using your sex if we hire and employ you—for non-U.S. Dow People Leaders and Grade 10+ jobs (collectively "**Non-U.S. Dow Leaders**"), including by measuring whether Dow has met its threshold (50%), target (100%), and max (200%) performance award targets for the following metric, which accounts for 2.2% of the total bonus award weighting for Non-U.S. Dow Leaders¹: the percentage of women in Dow's global workforce across all jobs—i.e., 30.0% (threshold), 30.5% (target), 31.0% (max).
- For jobs located in the United States only:
 - To comply with applicable federal, state, and local laws, regulations and executive orders, including: (i) by inviting you to voluntarily self-identify your race, ethnicity, sex, protected veteran status, and disability status during the application process ("**Your U.S. Applicant Self-ID Data**"); (ii) by giving

¹ Dow policy prohibits hiring, firing, or promoting on account of an individual's gender or any other protected status.



deference to Your U.S. Applicant Self-ID Data and not questioning or overriding it based on our visual observation or otherwise; and (iii) by maintaining the confidentiality of Your U.S. Applicant Self-ID Data and keeping it separate from your application and inaccessible to our hiring manager and interviewers.

- To improve diversity in recruiting practices, including by aiming for the candidate slate in the hiring-manager-interview stage to include (i) more than one sex and (ii) at least two races/ethnicities (which aim our recruiters may seek to achieve by generating deidentified reports per recruitment step of the candidate slate's overall percentage of male/female candidates and racial makeup, and potentially expanding the candidate slate with additional qualified candidates without regard to—and without selecting any candidate based on—any individual candidate's sex or race/ethnicity).
- To comply with applicable federal, state, and local reporting and record retention requirements (e.g., EEO-1 reports) if we hire and employ you, including: (i) by inviting you during the on-boarding process to confirm Your U.S. Applicant Self-ID Data (if you chose to provide this to us during the application process), and/or by inviting you during the on-boarding process to voluntarily self-identify Your U.S. Applicant Self-ID Data (if you chose not to provide it during the application process) (collectively, "**Your U.S. Onboarding Self-ID Data**"); (ii) by pre-populating Your U.S. Applicant Self-ID and/or Your U.S. Onboarding Self-ID Data in our human resources management system (if you chose to provide this to us during the application/onboarding processes), and/or by enabling you to use our human resources management system to self-identify (or change) your race, ethnicity, sex, , disability status, and protected veteran status ("**Your U.S. HRMS Self-ID Data**"); and (iii) by potentially using visual observation—if necessary—to report your race, ethnicity, and sex (if you have not already provided this information to us via Your U.S. Applicant Self-ID Data, Your U.S. Onboarding Self-ID Data, and/or Your U.S. HRMS Self-ID Data) ("**Our U.S. Visual Observation Data**").
- To comply with applicable federal, state, and local regulatory and contractual equal opportunity requirements , including potentially by using Your U.S. Applicant Self-ID Data, Your U.S. Onboarding Self-ID Data, Your U.S. HRMS Self-ID Data, and/or Our U.S. Visual Observation Data: (i) to develop and maintain one or more written affirmative action programs ("**AAP**") ; (ii) to comply with Office of Federal Contract Compliance Programs (OFCCP) compliance evaluations and complaint investigations; (iii) to perform analyses of our employment process to determine whether and where impediments to equal opportunity exist; (iv) to develop and execute action-oriented programs; and (v) to develop and maintain an auditing system that periodically measures the effectiveness of these programs.



- To perform data analysis involving all or certain of Your U.S. Applicant Self-ID Data, Your U.S. Onboarding Self-ID Data, Your U.S. HRMS Self-ID Data, and Our U.S. Visual Observation Data (collectively, "**Your U.S. Demographic Data**") for research and statistical purposes, which may be distributed both internally and externally to Dow through aggregated and anonymous reports.
- To manage Dow's Performance Award Program—and measure certain of its performance metric targets using your race/ethnicity, and sex if we hire and employ you—for U.S. Dow People Leaders and Grade 10+ jobs (collectively "**U.S. Dow Leaders**"), including by measuring whether Dow has met its threshold (50%), target (100%), and max (200%) performance award targets for the following two metrics, each of which accounts for 2.2% of the total bonus award weighting for U.S. Dow Leaders²: (i) the percentage of women in Dow's global workforce across all jobs—i.e., 30.0% (threshold), 30.5% (target), 31.0% (max); and (ii) the percentage of U.S. ethnic minorities in Dow's workforce across all jobs in the U.S.—i.e., 29.4% (threshold), 30.3% (target), 31.2% (max).

If you choose to apply for a job with (or otherwise submit your professional profile to) Dow, you may be presented with the option to receive occasional email updates from Dow in your selected areas of interest. If you elect to receive such email updates from Dow, you may change this election, or withdraw completely and discontinue such email updates, at any time by updating your registration information found under the My Account Options in our ATS.

We collect only the personal data from you that we need for the purposes described above. For statistical purposes, improvement of our services, and testing of our IT systems we use as much as reasonably possible anonymized data. This means that these data can no longer (in)directly identify you or single you out as an individual.

For more information about the specific categories of Your Non-U.S. Demographic Data and/or Your U.S. Demographic Data that we may collect in your country—and/or in the country where the job you applied for (or are interested in) is located—as well as the purposes for which we may process such data, please send a request to the Dow Data Privacy Office at fglpriv@dow.com.

How we safeguard your personal data

We maintain reasonable and appropriate technical, administrative, organizational, and physical security and confidentiality measures designed to help protect your personal data from unauthorized access or use. We also require (other than in certain emergency situations) third-

² Dow policy prohibits hiring, firing, or promoting on account of an individual's race, gender, or any other protected status.



party service providers acting on our behalf—or to which we otherwise disclose your personal data—to provide similar security and confidentiality measures.

Our retention of your personal data

Dow will retain your personal data for as long as necessary to fulfill the purposes for which we collect it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

As Dow is a global organization with its corporate headquarters in the United States in Midland, Michigan, Dow will maintain and store your personal data and information primarily in its ATS, and certain authorized Dow personnel will have cloud-based, role-based access to your personal data. Dow may share your personal data with certain Dow personnel in various countries as reasonably necessary for the human resources purposes listed above, unless you object to it at any time during this process. Any third parties that may collect information from you on Dow's behalf are located, and may store your personal data, in various countries. Dow and any third parties acting on Dow's behalf will keep your personal data confidential and abide by all applicable legal requirements, and they will use your personal data only for the human resources purposes listed above, as directed and controlled by Dow.

Dow will retain your personal data and information for a period of 36 months (non-EU jobs) or 6 months (EU jobs) after the closure of your last active job application, unless you specify otherwise, or unless applicable law requires Dow to keep your personal data and information beyond that retention period. The applicable retention period is determined by the primary location of the job. Certain aspects of your personal data may be rendered wholly anonymous and retained by Dow beyond the retention period for statistical, research or reporting purposes or otherwise as required by applicable law. If you wish to request deletion of your personal data, please submit a data subject request [here](#). Alternatively, you may log in to your Candidate Home Account in our ATS and, under Account Settings, go to “Delete my information” and click the “delete my information” button.

If you become employed by Dow, Dow will retain certain aspects of your candidate profile, including your personal data, beyond the 36-month retention period to comply with applicable law, to maintain accurate employee records, and otherwise to manage Dow's global workforce. Dow will transfer this information from your candidate profile in our ATS to your employee profile within our Human Resources Management System (i.e., Workday) (the “HRMS”) and process it in accordance with applicable law and Dow policies. Upon commencing work with Dow, certain aspects of your employee profile in our HRMS may be visible within Dow by default (e.g., employee ID, position and title, location and manager, education, skills, and job history); but you can choose to edit or remove certain information (e.g., your education, skills, and job history) in your employee profile.

If you become employed by Dow, Dow will transfer Your Non-U.S. Demographic Data and/or Your U.S. Demographic Data—to the extent you provided this to us—from your candidate



profile in our ATS to your employee profile in our HRMS and process it in accordance with applicable law and Dow policies. Dow employees may provide, change, or delete their self-identification demographic data at any time in the “change my personal information” portal in our HRMS. However, our HRMS maintains a log history of such changes, and the log history may contain and reveal your deleted self-identification demographic data (e.g., “was Native Hawaiian”). The log history is accessible only to you and, within Dow, to select human resources administrators with role-based access and a need to know. Employees may submit a request for Dow to delete the log history of their changes: (1) by submitting an HR Case request via our Employee Center portal or (2) by submitting a data subject deletion request [here](#) or by email to the Dow Data Privacy Office (fglpriv@dow.com). In certain jurisdictions, applicable law may require Dow to keep the log history or your changes even if you ask us to delete it—e.g., to enable Dow to comply with local laws requiring us to report employee demographic information to government authorities, or to provide required employee demographic information to our benefits administrators in order to enable them to provide employee benefits (such as health insurance) and to enable us to perform our employment agreement obligations), in which case we will inform you of the reason(s) that Dow must maintain—and cannot delete—the log history or your changes.

Automated decision-making and profiling

We do not use automated decision-making to make any final hiring decisions. And we generally do not make recruiting or hiring decisions based solely on automated decision-making. However, we may use certain automated tools to filter, screen, and score certain candidate questionnaires in our applicant management system. In those cases, the questionnaire scores appear on the grid for our recruiters to easily see and recognize negative scores. For North America campus job requisitions only, negative scores are automatically dispositioned (declined), such that we screen out those applicants solely using automated means. For more information about—or to object to—our use of such automated tools to filter, screen, and score candidate questionnaires, you may submit a data subject request [here](#).

In furtherance of the certain purposes listed above (particularly: to confirm the accuracy of your contact information; to consider you for (or inform you of) other potential career opportunities at Dow, to which you have not specifically applied; to send you announcements and updates about Dow in your selected areas of interest; and to manage our relationship with you), we may use automated methods to build a profile based on data that we have obtained as described in this Notice such as the Dow jobs to which you have applied; your skills, qualifications, interests, and suitability for the work; our evaluation of you as a candidate for employment with Dow; opened emails; your webinar registrations; and your recent interaction and activities with Dow. For more information about—or to object to—these profiling activities, you may submit a data subject request [here](#).

In furtherance of certain security and compliance-related purposes (particularly: to maintain and protect the security of our facilities, services, systems, networks, computers, and information; to prevent and detect security threats, fraud, or other criminal or malicious activities; to manage IT



resources and infrastructure; to assure compliance with Dow policies and applicable law; and to monitor for policy violations), Dow may use certain automated methods to build a de-identified profile based on data that we have obtained as described in this Notice, subject to local legal requirements. Access to such profiles is generally limited to Dow Information Security Services. Use at the individual level requires a compelling security and compliance-related interest, as determined by Dow leaders and the Office of Ethics and Compliance on a case-by-case basis. For more information about—or to object to—these profiling activities, you may submit a data subject request [here](#).

Artificial intelligence

In certain locations, we may use a conversational artificial intelligence assistant (the “**AI Assistant**”) for certain talent acquisition purposes (e.g., to interact with you via chat/text, to answer your questions, to help you search for available jobs, to create a job application, to schedule phone screens and interviews, to send reminders about upcoming interviews, to provide status updates, to facilitate onboarding tasks). For more information about our AI Assistant, please refer to our [Data Privacy Notice \(for Dow’s AI Assistant for Recruiting\)](#).

Dow may use certain enterprise AI systems, including Generative AI tools (e.g., [Microsoft CoPilot](#)), to process your personal data in accordance with applicable law and Dow policies. For more information about—or to object to—our use of enterprise AI systems, you may submit a data subject request [here](#).

Communications

We may communicate with you about our hiring process via mail, telephone, email, text message, social media, and other electronic messages via our websites and applications. If you reside in the United States, you may be eligible to receive SMS text message communications from us (e.g., to get information about our application and hiring process, search for job openings, create job applications, and/or schedule phone screens and interviews). If you reside outside the United States, you may be eligible to receive such communications via WhatsApp, subject to that platform’s terms of service and privacy practices. By opting in to receive such messages from us—whether through your Dow job application, by initiating a text or WhatsApp conversation with us, or by otherwise by accepting our terms—you authorize us and those acting on our behalf to send automated messages using an automatic telephone dialing system to the mobile number you provide.

Message conversations may be monitored, reviewed, recorded, retained, and shared by us and our service providers for purposes including responding to you, fulfilling your requests, training, quality assurance, analytics, and improvement. You may receive recurring automated messages related to your application and—if hired—onboarding and employment. Message frequency may vary. Message and data rates may apply for SMS, and data charges may apply for WhatsApp based on your internet plan.



You may **opt out** of receiving messages at any time by replying **STOP** to our SMS messages or sending **STOP** via WhatsApp. After you opt out, you will receive one final message confirming that you have been unsubscribed. For assistance, reply **HELP** to our SMS messages or send **HELP** via WhatsApp. You may also contact our service provider for help at info@paradox.ai. Neither we nor our service providers nor wireless carriers are responsible for delayed or undelivered messages. If you are not the primary account holder for the mobile number you provide, you confirm you are authorized to consent on behalf of the account holder. We reserve the right to change and consolidate our telephone numbers, including short codes. If you do not agree to receive messages from new numbers or short codes, your sole remedy is to opt out. For more information, please refer to our [Data Privacy Notice \(for Dow's AI Assistant for Recruiting\)](#).

Cookies and other tracking technologies

We may use cookies, pixels, log files, and other tracking technologies to gather information (sometimes across devices) about your use of, or interaction with, our website, applications, social media properties, advertisements, and email messages.

The tracking technologies we place in our emails help measure the effectiveness of our email campaigns, including by identifying: the individuals who open or act upon the email; when the email is opened; how many times the email is forwarded; the type of software, device, operating system, and browser used to deliver/receive the email; and any URL accessed through the email.

We may use and disclose the information we collect with these tracking technologies (alone and/or in combination with other information we collect online and offline about you), for the purposes described in this Notice, including to help us reach you on third-party advertising networks. The third-party advertising networks and other businesses who operate certain of these tracking technologies may also compile information about you that is used to personalize ads delivered to you on third-party websites. Please refer to the "[What Information We Collect](#)" section of our website [Privacy Statement](#) for more information, including: to learn about how we and our service providers may use cookies and other tracking technologies; to review a list of specific cookies we use on our websites; and to learn about your choices, including how you can manage, delete, or block cookies.

The legal bases on which we process your personal data

We process your personal data for the purposes described in this notice based on one of the following legal bases, as applicable:

- *Pre-Contractual Measures.* We may process your personal data—in response to your application for employment with Dow—to take necessary steps and pre-contractual measures prior to (potentially) executing an employment contract with you.



- *Legal Compliance.* We may process your personal data to comply with our legal obligations (e.g., local labor & employment laws, tax laws, regulatory and other reporting requirements, cooperation with authorities, statutory retention periods).
- *Legitimate Interests.* We may process your personal data to the extent necessary for the purposes of our legitimate interests, insofar as our interests are not overridden by your privacy interests and fundamental freedoms. Such interests may include:
 - Assessing your application, skills, qualifications, experience, and interests. Evaluating you as a candidate against other qualified candidates. Finding the most suitable candidate for the job. Deciding whether to offer you employment.
 - Considering you for (or informing you of) other potential career opportunities at Dow, to which you have not specifically applied. Sending you announcements and updates about Dow. Managing our relationship with you.
 - Maintaining records about you. Analyzing our hiring practices and outcomes. Improving our application and recruitment process.
 - Carrying out audits and reviews. Complying with Dow's corporate policies and legal requirements and investigating alleged violations thereof. Responding to complaints, processing requests, and defending against legal claims. Managing process quality and insurance.
 - Reorganizing, acquiring and selling activities, business units and companies.
 - Maintaining and protecting the security of our facilities, services, systems, networks, computers, and information. Preventing and detecting security threats, fraud, or other criminal or malicious activities. Managing IT resources and infrastructure.
 - Improving diversity in recruiting practices.
- *Contract Performance.* If we offer you employment, we may process your personal data to the extent necessary to execute and perform the employment contract with you, including by: Confirming you meet internal and legal requirements relevant to the position. Creating and signing the employment contract and other employment documents. Creating necessary user accounts for you in our information systems. Providing you access to the Dow premises. Providing notifications to governmental authorities. Performing the onboarding process. Providing you with any equipment, training, and information required for the job. Arranging any mandatory medical examinations.



- *Consent.* We will seek your consent to process your personal data in specific circumstances, for certain activities described in this privacy notice, and/or when otherwise required by applicable law—e.g., if you choose to receive occasional email updates from Dow in your selected areas of interest; or if you choose to provide Your Non-U.S. Demographic Data and/or Your U.S. Demographic Data to us (in which case you consent to Dow processing and using such data in accordance with applicable law and Dow policies).

Third parties with whom we share your personal data (in and outside the country where the Dow Company that controls your information is located)

We share your personal data with other Dow Companies or third parties as necessary for the purposes described in this Notice and the table below:

Recipient	Purpose
DOW Companies	The purposes described in this privacy notice
DOW business partners, distributors, and agents	The purposes described in this privacy notice
Service providers working on Dow's behalf—e.g., providing services such as IT tools and infrastructure; human resources systems and services; payment processing; professional and advisory (including accountants, auditors, lawyers, insurers, bankers, recruiters, travel agents and other advisors or service providers)	The purposes described in this privacy notice
Third-party references that you have provided and given us permission to contact	Confirm duties of prior roles; learn about strength/weaknesses; find most suitable candidate for the job
Insolvency administrators or creditors	For default and insolvency management
Potential or actual acquirers of DOW businesses or assets	For the evaluation of the business or assets in question or for the purposes described in this privacy notice
Recipients as required by applicable law or legal process, to law enforcement or government authorities, etc.	Where required by applicable law or a legitimate request by government authorities, or a valid legal requirement

International transfer of your personal data

Where we share your personal data with a Dow Company or third party—so that it is transferred to or becomes accessible from outside the European Union (“EU”) and the European Economic



Area ("EEA") or outside the country where the Dow company that controls your data is located—we put adequate safeguards in place to protect your personal data. Examples of these safeguards are an adequacy decision of the European Commission ([read more here](#)), Standard Contractual Clauses ([read more here](#)), and the Binding Corporate Rules that some of our suppliers have adopted ([read more here](#)). We have taken additional measures for the transfer of data from within to outside the EU, EEA and outside the country where the Dow Company that controls your data is located to protect your personal data. If you would like an overview of the safeguards which are in place, you may submit a request [here](#) or send an email request to fglpriv@dow.com.

Workday 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) 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. Workday has 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) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. To learn more, please visit Workday's [Data Privacy Framework Notice](#) and <https://www.dataprivacyframework.gov/>.

Your rights relating to your personal data

Depending on the jurisdiction in which you are located, in which your personal data is processed, and in which the job you applied for is located, you may have the data subject rights listed below. Such rights are not absolute (and may not apply in your jurisdiction). You may submit a data subject request by email (fglpriv@dow.com) or via the form [here](#) (internal) and [here](#) (external). We cannot always act on a request (e.g., if our legal/contractual obligations prevent us from doing so). No fees or payments are required to exercise your rights, but we may charge fees for duplicate/excessive requests. We may request information to confirm your identity and applicable rights.

Data privacy rights	What it means
Right of access	You may request access to—and information about the Processing of—your personal data.
Right to rectification	You may request rectification of your inaccurate—and completion of your incomplete—personal data.
Right to Erasure	You may request erasure of your personal data.
Right to restriction	You may request restriction of the processing of your personal data.
Right to data portability	You may request to receive your personal data in a commonly used and machine-readable format (and/or transmit the data to another controller).
Right to object	You may object to the processing of your personal data.



Right to withdraw consent	You may withdraw your consent to the processing of your personal data.
Right to lodge a complaint	You may lodge a complaint with data protection authorities regarding the processing of your personal data.
Right to not be subject to decisions based solely on automated Processing/profiling	We may not subject you to a decision based solely on automated processing/profiling (without human intervention) that produces adverse legal effects or significantly affects you, absent your consent or a legal requirement or lawful contractual obligation/necessity to do so.
Right to information	We must provide you with information regarding the processing of your personal data collected from you or from others.

If you are a California or EU resident, please refer to the relevant section of our website [Privacy Statement](#) for more information: “[Additional Information for EU-Based Users](#)” or “[Additional Information for California Residents](#).”

What happens if you ask us to stop processing (or do not provide) your information

Dow may not be able to adequately assess your application, skills, qualifications, experience, and interests; evaluate you as a candidate against other qualified candidates; confirm you meet internal and legal requirements relevant to the position; or otherwise perform the purposes described above without certain personal data. Although we cannot obligate you to share your personal data with us, please note that this then may have consequences which could affect your application and/or candidacy in a negative manner, such as not being able to take requested pre-contractual measures to enter into a contract with you or to establish the employment relationship you have asked for.

Changes to this Notice

We may amend this Notice from time to time. We will notify you of a change by posting a new “last updated” date at the bottom of this Notice. If we make a material change to this Notice, then we will attempt to further notify you of such change (e.g., via email, via a notice posted on our website, or via a message delivered through our ATS), if and to the extent required by applicable law.

No contract

This Notice does not constitute a contract between any Dow Company and any job applicant, candidate, or other individual.



Contact and further information

If you have any questions or concerns about how we process your personal data, please contact the Dow Data Privacy Office at fglpriv@dow.com. You may also direct any questions, requests, and inquiries concerning the information in this Notice to your local Dow representative.

For more information about Dow's data privacy practices, including about certain data subject rights that may apply to you under applicable law, please refer to Dow's [Privacy Statement](#). If you are a California resident, please refer specifically to the Privacy Statement's "[Additional Information for California Residents](#)" Section, which is incorporated herein by reference.

Should you not be satisfied with our response or believe we are processing your personal data against the law, you may also have the right to file a complaint with the applicable data protection or privacy authority in your country of residence or work (and/or in the country in which the job you applied for is located), or to seek a remedy through the courts where you believe an infringement of data privacy laws may have taken place.

Last Updated: December 5, 2025