

**EFFECTIVE DATE: March 29, 2019**

## **Raytheon Careers Privacy Policy**

This Careers Privacy Policy (the “Policy”) governs how Raytheon Company and its subsidiaries (singularly and collectively, “Raytheon,” “we,” or “us”) collect, use, and protect personal information provided to us in connection with applications for employment at Raytheon (“Applicant Information”).

Please review this Policy before applying to any job posted on [Raytheon’s Careers website](#) (the “Site”). By providing us with your Applicant Information, you confirm that you consent to the processing of your Applicant Information in accordance with the terms of this Policy to the fullest extent allowed by law. This Policy does not form part of any contract of employment offered to applicants hired by Raytheon.

The Site is operated on behalf of Raytheon Company, and Raytheon Company as controller or data owner is responsible for the processing of the Applicant Information via the Site.

### **1. Definitions**

1.1 ***Applicant Information*** is personal information provided to us in connection with applications for employment. Raytheon Company may collect Applicant Information directly from a job applicant or from third parties in connection with, for example, a background or reference check, subject to your consent where required or permitted by law. Applicant Information includes, but is not limited to, names, log-in credentials, telephone numbers, social security number (as relevant), addresses, email addresses, date of birth, education history, job experience and history, criminal history and background checks (where permitted by law), professional skills, compliance information (such as country of birth; any permanent residencies that you have ever held, as well as the dates of those residencies; any citizenships you have ever held (including your current citizenship, as well as past or current dual citizenships, if any); and any other country where you have lived recently, as well as the dates corresponding thereto), and other information you voluntarily provide through, for example, cover letters, resumes, email communication, interviews, and via the online form on the Site.

1.2 ***Sensitive Applicant Information*** is Applicant Information concerning nationality or citizenship, race or ethnic origin, criminal history, or trade union membership, which may be collected to the extent necessary under applicable law or as permitted by applicable law. We do not request or consider information concerning religion, sex life or political opinions in connection with recruiting.

1.3 ***Processing*** refers to the handling of Applicant Information, such as collecting, recording, organizing, storing, transferring, using, disclosing, or deleting.

### **2. Collection and Processing of Applicant Information**

2.1 Raytheon Company collects and processes Applicant Information for legitimate human resources and business management purposes, including processing and evaluating candidates for careers at Raytheon; record-keeping related to hiring processes; conducting analyses of hiring; communicating with you and others, conducting background checks, where permitted by law, and complying with legal obligations and requests. In addition, we may use Applicant Information for regulatory and corporate governance requirements, and may disclose Applicant Information where permitted or required by law. If you are hired, we may use your Applicant Information in connection with your employment consistent with Raytheon’s employment data policies.

2.2 You are under no statutory or contractual obligation to provide data to Raytheon during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all. The provision of your Applicant Information is fully voluntary.

2.3 Raytheon Company may also retain and use your Applicant Information to consider you for positions other than that to which you have applied. For jurisdictions other than the United States, unless required for legal purposes or in connection with your employment as specified above, we will retain Applicant Information for a maximum of three years (or less where required by law). Additionally, for jurisdictions other than the United States, unless required for legal purposes, if you do not want to be considered for other positions or would like us to delete your Applicant Information, you may contact us as specified in Section 4.3, Inquiries, Complaints and Objections.

2.4 Raytheon Company processes Sensitive Applicant Information only where it is necessary and proportional in light of the requirements of the position at issue and is allowed by the applicable law. For instance, in some jurisdictions, information about the race of applicants must be maintained in order to ensure documentation of equal employment opportunities.

2.5 Legal Basis under the GDPR.

To the extent the EU General Data Protection Regulation ("GDPR") applies, Raytheon Company relies on the following legal bases to process the Applicant Information:

- The processing is necessary in order to take steps at your request prior to entering into a contract.
- The processing is necessary for compliance with a legal obligation to which Raytheon is subject.
- The processing is necessary for the purposes of the legitimate interests pursued by Raytheon, such as matrix structures, centralized approval lines, and existing group structure.
- Your consent, especially with respect to the retention of your applicant data to consider you for future positions at Raytheon or its affiliates.

### **3. Disclosure of Applicant Information**

3.1 Depending on where the position is for which you applied, Raytheon Company will share your Applicant Information with the relevant Raytheon affiliate in such country so that they can continue the hiring process on a local level. Furthermore, due to the global matrix structure of Raytheon, Raytheon Company will share your Applicant Information with other Raytheon affiliates where centralized functions relevant for the hiring process are located.

3.2 Raytheon may share your Applicant Information with third parties that perform services on our behalf. Such third-party service providers have access to Applicant Information solely for the purposes of performing the services specified in the applicable service contract, and we require that providers undertake security measures consistent with the protections specified in this Policy.

3.3 Raytheon may transfer your Applicant Information in connection with the sale or acquisition of one or more of our businesses or subsidiaries to a different company that agrees to offer equivalent safeguards for the use and disclosure of such information.

3.4 We will not disclose your Applicant Information without your consent other than as described in this Policy except (1) where such disclosure required by law; (2) to protect Raytheon's legal rights to the extent authorized or permitted by law; or (3) in an emergency where the health or safety of you or another individual may be endangered.

### 3.5 International Transfers.

You should expect that the recipients, identified above which will receive or have access to your personal information, are located inside or outside the European Economic Area ("EEA").

- Raytheon Company is certified under the EU-U.S. Privacy Shield and thereby recognized as providing an adequate level of data protection from a European data protection law perspective.
- Some recipients, in particular third party service providers, located outside of the EEA are also certified under the EU-U.S. Privacy Shield or are located in countries with adequacy decisions pursuant to Art. 45 GDPR (in particular, Canada (for non-public organizations subject to the Canadian Personal Information Protection and Electronic Documents Act), Switzerland, and Israel), and, in each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective. Certain third party service providers will either be certified under the EU-U.S. Privacy Shield or will be located in such a country with adequacy decision.
- Other recipients might be located in countries which do not adduce an adequate level of protection from a European data protection law perspective (in particular, the USA and other countries where Raytheon affiliates are located - <https://www.raytheon.com/ourcompany/global>). We will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law.
  - With respect to transfers to countries not providing an adequate level of data protection, we will base the transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority (Art. 46(2)(c) or (d) GDPR), approved codes of conduct together with binding and enforceable commitments of the recipient (Art. 46 (2)(e)), or approved certification mechanisms together with binding and enforceable commitments of the recipient (Art. 46 (2)(f) GDPR). You can ask for a copy of such appropriate safeguards by contacting us as set out in Section 4.3 below.
  - The data transfer to Raytheon affiliates and third party service providers which are neither certified under the EU-U.S. Privacy Shield nor in a country with other adequacy decision will typically be protected by standard data protection clauses adopted by the European Commission (Art. 46(2)(c) or (d) GDPR) unless a derogation in Art. 49 GDPR applies.

## 4. Rights of Applicants

### 4.1 Access, Correction and Deletion

Raytheon will provide you with reasonable and appropriate access to your Applicant Information that we hold to the extent required by law. You may request correction or deletion of your Applicant Information, except where retention is required by your contractual relationship with Raytheon, if applicable, in the context of a legal dispute, or as otherwise required by law. If we deny your request for access, correction or deletion, we will communicate the reason for the denial to you within thirty days. If you are in the EU/EEA or if the GDPR otherwise applies to you, further details on your data privacy rights under the GDPR can be found in the Raytheon [Website Privacy Policy](#).

### 4.2 Automated Decisions

Raytheon does not make recruiting or hiring decisions based solely on automated decision-making within the meaning of the GDPR.

#### 4.3 Inquiries, Complaints and Objections

If you wish to request the withdrawal of your consent to the processing of your Applicant Information or submit inquiries, complaints and/or objections to such processing, please send a request in writing to: [PrivacyPolicy@Raytheon.com](mailto:PrivacyPolicy@Raytheon.com) or:

Chief Ethics and Compliance Officer  
RAYTHEON COMPANY  
Waltham Woods  
870 Winter Street  
Waltham, MA 02451-1449

In certain jurisdictions, you also have the right to lodge a complaint with the competent supervisory authority.

The processes described in this Policy supplement any other remedies and dispute resolution processes provided by Raytheon and/or those available under applicable law.

### **5. Direct Marketing**

5.1 Raytheon will not use Applicant Information to market products or services to you or provide Applicant Information to third parties for direct marketing purposes. These restrictions do not apply to contact or other personal information obtained in the context of a customer, consumer or other non-employment relationship with Raytheon.

### **6. Security**

6.1 Raytheon maintains administrative, technical and physical safeguards designed to protect Application Information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. While Raytheon makes extensive effort to prevent unauthorized access to personal information, the security of information transmitted via the internet cannot be guaranteed. Any information disclosed online can potentially be collected and used by others aside from the intended recipient. Thus, Raytheon cannot warrant that your Application Information will not be disclosed to or accessed by unauthorized parties.

### **7. Use of Cookies and Other Automatic Information Collection**

#### 7.1 IP Addresses.

An internet protocol address, or IP address, is automatically assigned to your computer when you access the internet, and is used by web servers to identify your computer. When you access our Site, we may log your computer's IP address, however, your personal identity will remain unknown to us, except it is otherwise revealed. We log the IP addresses for system administration, for auditing the use of our Site, and for collecting statistical information for marketing, cybersecurity, and other purposes.

#### 7.2 Cookies or Tracers.

We may place information on your computer to allow us to identify you. This information is known as a "cookie." We use cookies to view information about your activities on our Site, such as your preferences or which pages you have visited on the Site. By understanding how and when our visitors use the Site, we can continually improve our Site, as well as our products and services. Your browser may have controls that allow you to refuse all cookies or indicate when a cookie is being sent.

We use tracking scripts or "tracers" that recognize a unique identifier from a cookie placed on your computer by another non-Raytheon website. These are used by Raytheon to gauge the success of our own advertising. For instance, we may use a tracer to determine whether you visit our employment pages after visiting a career site where Raytheon placed a banner advertisement. We do not use tracers to gather information on your use of the internet unrelated to Raytheon, or to determine your personal information, and you remain anonymous to Raytheon unless you choose to provide personal information.

#### 7.3 Web Beacons.

Web beacons are small files that we may place on our Site, which count the number of unique users that have visited a specific page on the Site and the number of times a given page has been displayed. This information is collected generally in the aggregate and is not linked to any personal information (except as described below).

#### 7.4 Pixel Tags.

We may use "pixel tags," or short pieces of code, to better measure the effectiveness of our content. These also allow social networks and other services to deliver content to you based on your visit to our website.

#### 7.5 Custom URLs.

We may track your visit by providing you with a unique universal resource locator, or URL, via an e-mail, a letter or other communication. When you use this unique URL, our website registers the visit. We use this information to measure the effectiveness of our advertising and other content.

#### 7.6 Do-Not-Track.

Our information collection practices operate as described in this Privacy Policy independent of any "do-not-track" choice you make.

#### 7.7 Third party Cookies.

Third party advertising can help make the advertisements you see across the web more personalized, but some people feel they are invasive.

7.8 You may set your browser to refuse all cookies or to allow your browser to alert you when a cookie is set; however, some things may function differently and not as well if you block all cookies. If you do not wish to receive advertising cookies, you may wish to visit the Network Advertising Initiative (NAI) website by clicking [here](#) and the Digital Advertising Alliance (DAA) website [here](#) or the TrustArc website [here](#).

### **8. EU-U.S. Privacy Shield Framework**

8.1 To provide an adequate level of protection for personal information received from the EU/EEA, Raytheon participates in the EU-U.S. Privacy Shield Framework ("Privacy Shield" or the "Framework"). Raytheon adheres to the Privacy Shield Principles as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information transferred from the EU and the United Kingdom to the United States, which includes personal information about Raytheon EU job applicants. We are committed to subjecting such personal information to the Privacy Shield, including its Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability.

We may transfer the personal information we collect to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which the information was initially provided.

If there is any conflict between the terms in this Section on Privacy Shield and the Privacy Shield Principles, the Privacy Shield Principles shall govern to the extent of the conflict. To learn more about the Privacy Shield program visit [www.privacyshield.gov](http://www.privacyshield.gov), and to located and view our certification, please visit <https://www.privacyshield.gov/list>.

#### 8.2 EU Applicant Information Collection, Use, and Disclosure.

Raytheon US collects, receives, and processes the categories of EU Applicant Information as described in Section 1 above. Raytheon US will use and otherwise process EU Applicant Information in the United States for the purposes identified in Section 2 above. Raytheon US transfers EU Applicant Information to the following types of third parties: job application management providers, employee onboarding providers, document management systems providers, and human resources information systems providers. Further details are provided in Section 3 above.

#### 8.3 Rights of EU Applicants.

If you are an EU applicant, you have the right to access your own EU Applicant Information subject to certain limitations, such as where the legitimate rights of other persons would be infringed or where the burden or expense of providing access would be disproportionate. If you wish to exercise such rights, please contact us as described above in Section 4.3.

#### 8.4 Choices of EU Applicants.

We do not otherwise use or disclose EU Applicant Information in a manner that is subject to choice requirements under the Framework. Raytheon US will exercise appropriate due diligence in the selection of such third party service providers, and require that such third party service providers maintain reasonable precautions to protect EU Applicant Information, and otherwise process EU Applicant Information only as instructed by the Company and for no other purposes. Company intends to use EU Applicant Information for the purposes for which such information was originally collected and does not otherwise use or disclose EU Applicant Information in a manner that is subject to choice requirements under the Framework. Raytheon US discloses limited EU Applicant Information to background check providers where permitted by applicable law and only with your express consent.

#### 8.5 Recourse, Enforcement, and Liability.

Please contact us as specified if you have any questions, need access to your EU Applicant Information, or otherwise need assistance. We remain responsible for our collection, use and disclosure of EU Applicant Information in accordance with the Framework. We also are responsible for third party agents that are processing such data on our behalf, unless we prove that we are not responsible for the event giving rise to the damage. In certain situations, we may be required to disclose EU Applicant Information in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

If you have an unresolved concern about EU Applicant Information that we have not addressed satisfactorily, we have committed to cooperate with the panel established by the EU Data Protection Authorities to serve as our independent dispute resolution body for the Framework. We are also subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to the Framework. In addition, under certain conditions, more fully described on the Privacy Shield website, EU applicants may invoke binding arbitration for non-monetary issues when other dispute resolution procedures have been exhausted.

#### 8.6 Contact Us.

Please contact us using the contact information under Section 4.3, Inquiries, Complaints and Objections above if you have any questions related to the Privacy Shield, wish to exercise your rights of access, or wish to seek other assistance as described above.

## **9. Changes to this Policy**

9.1 Raytheon Company reserves the right to modify this Policy by posting changes to the Site. If you submit additional Applicant Information or request to be considered for a Raytheon position following the effective date of revisions to this Policy, your Applicant Information will be handled in accordance with the Policy in effect at that time.