

Privacy Notice for Job Applicants

Last Updated: December 22, 2022

Summary

This Privacy Notice for Job Applicants supplements our [Privacy Statement](#) and applies solely to individuals who submit to 23andMe, Inc., one or more application(s) for hiring consideration, and who reside in the state of California (“Job Applicants” or “Applicants” or “you”).

As a Job Applicant, you have the right to know and understand the categories of personal information we collect about you, and the purposes for which the categories of personal information shall be used, pursuant to the California Consumer Privacy Act of 2018 (the “CCPA”), as amended by the California Privacy Rights Act.

If you have any questions regarding the information presented on this page, please contact 23andMe at privacy@23andme.com.

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1. Key definitions

- **Job Applicant:** natural persons who reside in California, including (1) individuals who are in California for other than a temporary and transitory purpose; and (2) individuals who are domiciled in California, but are outside the state for a temporary or transitory purpose, and who submits his or her candidacy to 23andMe, Inc.
- **CCPA:** means the California Consumer Privacy Act of 2018, commencing on January 1, 2020, as amended or replaced from time to time, along with any implementing regulations.
- **Personal information:** as defined in the CCPA, and includes information that can be used to identify you, either alone or in combination with other information, and any other information that could reasonably be linked with a particular consumer or device. The CCPA does not consider publicly available information, deidentified, or aggregate consumer information as “Personal Information.”
- **Sensitive personal information:** includes, but is not limited to, Personal Information that reveals your racial or ethnic origin, social security, driver’s license, state identification card, or passport number, religious beliefs, health, sex

life or sexual orientation, citizenship or immigration status, genetic data, precise geolocation, or as otherwise defined in the CCPA.

2. Your Rights

Let's start with your privacy rights first. You have the right to:

- Know what personal information we collect, use, disclose, share, or sell.
- Receive a copy of your personal information.
- Correct inaccurate personal information.
- Delete your personal information.
- Receive your personal information in a portable and, if technically feasible, in a readily usable format.
- Opt out of: targeted advertising; the sale or sharing of your personal information with third parties; and/or, profiling in the furtherance of decisions that produce legal or similarly significant effects.
- Limit the use and sharing of your sensitive personal information. Your 23andMe application information likely includes sensitive Personal Information.
- Not receive discriminatory treatment if you exercise your privacy rights.

If you would like to make a privacy rights request, or to appeal an action we made related to your privacy request, you can email us at privacy@23andme.com with the subject line "Applicant Privacy Rights Request". We will require some additional information to verify your identity in order to process your request.

Alternatively, you may exercise your privacy rights through an authorized agent. If you use an authorized agent, we will require you to verify your identity and confirm that you have provided the authorized agent permission to submit the request on your behalf.

We will respond to your request within 45 days, and in more difficult cases we may extend our response time by another 45 days. Your rights under the CCPA are not absolute and 23andMe may exercise limitations or exemptions as permitted by the applicable laws.

3. Information you provide directly to us or through a third party

When you choose to visit our website and submit an application for consideration, or if you apply for a job through a third-party website, we may collect and process your personal information as necessary to consider your application. 23andMe collected the following categories of personal information from Job Applicants within the last twelve (12) months. The categories of personal information and other terms used below are defined in California Civil Code 1798.140, and may include reference to certain definitions set forth in our [Privacy Statement](#).



Some of the categories below require separate opt-in consent and these categories do not necessarily reflect all of the types of information that we may collect about you. We will provide you a separate notice if we collect any additional personal information about you. Some personal information included in the categories may overlap with other categories.

If you have given your explicit consent, for example via a data transfer authorization or other consent document, we may use, disclose, or share your personal information for commercial or research purposes to third parties. The purpose may vary and will be described in the consent at that time.

In the past 12 months, we have disclosed Personal Information to service providers and contractors for the business purposes described below.

Information	Description	Purposes
Identifiers	<p>Information such as your name and email address that you submit to 23andMe.</p> <p>User Content, such as your government issued ID which may be requested in exceptional circumstances to assist you in regaining access your account.</p> <p>Web-Behavior information, such as your device ID or IP address automatically collected when you visit our website or submit forms.</p>	<p>We use Identifiers to associate the various components of your application, communicate with you, and otherwise evaluate and facilitate application and interview processes.</p> <p>We may use such information for auditing, providing employment services, helping ensure integrity and security, debugging, short-term transient use, advertising and marketing services, internal research, and to maintain quality and safety in our application process.</p>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e))	<p>At the time of this posting, the Information listed in Cal. Civ. Code §1798.80(e) include name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>	<p>23andMe does not request many of the data elements included in Cal. Civ. Code §1798.80(e).</p> <p>We may use such information for auditing, providing employment services, helping ensure integrity and security, debugging, short-term transient use, advertising and marketing services, internal research, and to maintain quality and safety in our application process.</p>



Protected classification characteristics	<p>Protected classification characteristics we process include age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)</p> <p>We provide equal employment opportunity for all applicants and employees. All qualified applicants for employment will be considered without regard to an individual's race, color, sex, gender identity, gender expression, religion, age, national origin or ancestry, citizenship, physical or mental disability, medical condition, family care status, marital status, domestic partner status, sexual orientation, genetic information, military or veteran status, or any other basis protected by federal, state or local laws. You can review protected classifications under California Law here.</p>	<p>23andMe collects certain protected classification characteristics, such as gender, race, and veteran status entered in the U.S. Equal Opportunity Employment Information when you voluntarily provide it directly to us. Completion of this section of your application is entirely voluntary. Whatever your decision, it will not be considered in the hiring process or thereafter. Any information that you provide will be kept confidential.</p> <p>Free text submitted directly by you as part of your application, including your resume/CV, cover letter, or additional diversity characteristics may fall into this category.</p> <p>We may use such information for auditing, providing employment services, helping ensure integrity and security, short-term transient use, and internal research</p>
Professional, Education, or Employment-related information.	<p>Self-Reported Information may include education information relating to household income, occupation, and other professional data.</p> <p>If you are referred to 23andMe, we may also collect your relationship to the referrer and their evaluation of your work.</p> <p>This information is generally included in your resume/CV.</p>	<p>23andMe collects this information to assess a candidate's fit for a position based on the required or desired experience and skills.</p> <p>We may use such information for auditing, providing employment services, helping ensure integrity and security, debugging, short-term transient use, advertising and marketing services, internal research, and to maintain quality and safety in our application process.</p>
Geolocation	<p>Web-Behavior Information, which includes the identification or estimation of physical location or movement.</p>	<p>23andMe collects certain geolocation automatically when you submit an application as necessary to transmit your information electronically for consideration.</p>



		<p>You may choose to provide information about your location when submitting an application, or within your Resume/CV.</p> <p>We may use such information for auditing, providing employment services, helping ensure integrity and security, debugging, short-term transient use, advertising and marketing services, internal research, and to maintain quality and safety in our application process.</p>
Internet or other electronic network activity information	<p>Web-Behavior Information, including data generated from your use of our website and collected through log files, cookies, web beacons, and similar technologies, (e.g., browser type, domains, page views).</p> <p>Our Cookie Policy contains more information about how 23andMe processes Web-Behavior Information.</p>	<p>23andMe collects certain internet information automatically when you submit an application as necessary to transmit your information electronically for consideration as well as monitor, detect, investigate and prevent prohibited or illegal behaviors, to combat spam and other security risks.</p> <p>We may use such information for auditing, providing employment services, helping ensure integrity and security, debugging, short-term transient use, advertising and marketing services, internal research, and to maintain quality and safety in our application process.</p>
Inferences	<p>Inferences and derived information are any information, data, assumptions, or conclusions 23andMe infers based on analyses of facts, evidence, or another source of information or data.</p>	<p>23andMe makes inferences based on information provided by an applicant to inform the decision to extend an offer to an applicant, including but not limited to ability to succeed in a given position and their fit with company culture and values.</p> <p>We may use such information for auditing, providing employment services, helping ensure integrity and security, debugging, short-term transient use, advertising and marketing services, internal research, and to maintain quality and safety in our application process.</p>
Sensitive personal information	<p>Certain information about you may be considered “sensitive.” This includes data that reveals your: social security, driver’s license, state identification card, or passport number; precise</p>	<p>23andMe collects sensitive personal information to process your application for employment, such as confirming your work authorization.</p>



	geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; health.	We may use such information to provide employment services, helping ensure integrity and security, short-term transient use, and to maintain quality and safety in our application process.
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4. Retention

We retain personal information for as long as necessary to process your employment application or provide employment services, to fulfill the transactions you have requested, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary for different data types in the context of different services, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations.

23andMe will also retain limited information related to your application and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

5. Changes to this notice

23andMe will review and update this notice from time to time as needed. We recommend visiting this page periodically to stay aware of any changes. If we modify this notice, we will make the revised notice available through our website.

6. Contact information

If you have questions about this notice, or wish to submit a complaint, request or inquiry, please email 23andMe's Privacy Administrator at privacy@23andme.com, or send a letter to:

Privacy Administrator
23andMe, Inc.
349 Oyster Point Blvd
South San Francisco, CA 94080

1.800.239.5230