

Mozillian Privacy Notice

Effective Date: March 21, 2024

The Mozillian Privacy Notice (“Notice”) applies to all Mozilla employees, owners, directors, officers, and contractors (collectively, “Mozillians” or “you”).

Overview

This Notice describes Mozilla’s policies and practices regarding its collection and use of your Personal Information, and your privacy rights. In this Notice the terms “Mozilla”, “we”, “us”, and “our” refers to the Mozilla Corporation (“MoCo”) and its subsidiaries globally. Each legal entity of the Mozilla group is the data controller for its own employees’ Personal Information. We use the word “process” as an umbrella term that can include using, transferring, collecting, and storing data.

Throughout this Notice, we will include *non-exhaustive* examples of terms and other information. That means that when we say “such as” or “for example,” the examples that come after are not a total list of all possible examples; they are meant to be illustrative, not exclusive. This Notice tells you what to expect when we collect your Personal Information, but the information we actually process about you will vary depending on your role and personal circumstances.

Defining Personal Information

For the purposes of this Notice, “Personal Information” includes the definitions of “personal information” and “personal data” under applicable privacy laws. This generally means that Personal Information is any information that can be reasonably linked to an identifiable individual. Personal Information does NOT include:

1. Publicly Available Information, which includes:
 - Information that someone can lawfully get from government records, such as from Freedom of Information Act (FOIA) requests, and
 - Information that has lawfully been made available to the general public
2. Deidentified Information. Information that is deidentified in accordance with applicable laws, and therefore cannot reasonably be linked to an individual.
3. Aggregated Information. Information that relates to a group from which individual identities have been removed.

Why do we need to collect Personal Information?

Mozilla collects and processes your data for the following reasons:

1. It is necessary to enter or potentially enter into a contract with us, such as entering into an employment contract with us.
2. The processing is necessary under a legal obligation (such as payment of taxes).
3. The processing is necessary to protect your vital interests or those of another person (for example, in a medical emergency).
4. We have a legitimate interest in collecting it (such as ensuring the security of Mozilla's properties, and enabling your use of company equipment and systems).

Unless collecting your information is necessary to fulfill our contractual or legal obligations, you can choose whether or not you wish to give us your personal information; if you choose not to provide certain information, we may not be able to provide some of the services or benefits outlined in this Notice.

How do we collect your Personal Information?

Generally, we collect Personal Information directly from you (such as during the onboarding process). Sometimes we also create Personal Information about you based on other information you provide us, through your working relationship with Mozilla (such as performance reviews), or from third parties.

When we collect your Personal Information from third parties and not from you, it is because:

- You have given us express consent to do so; or
- Your consent is implied by your actions (e.g., you use a third-party employee service available to you through Mozilla); or
- You provided explicit or implied consent to a third party to share the information with us (e.g., employment search firm, temporary agencies, public social networks, etc.)

What Personal Information do we collect?

We collect and process different types of Personal Information about you. Just to be clear, not all of the data we describe in this section is asked for, or collected from everyone, everywhere.

Typical information includes:

- Individual Identifiers
 - Your employee identification number, LDAP, Slack name, usernames, etc.
- Contact Information
 - Your home address, telephone number, email address and the details of your emergency contacts.

- HR Management Data
 - Resume or CV, or other information you provide to us in support of an application and/or the application and recruitment process, letters of offer, acceptance of employment, or employment contracts, date of hire, date(s) of promotions, work history, training records, acknowledgements regarding our policies and employee handbooks, information relating termination of employment, pension/retirement offerings, transportation, and meal programs, records of work absences, sick/vacation/paid time off, entitlement and requests, disciplinary and grievance procedures (including monitoring compliance with and enforcing our policies).
- Demographic and biographical data
 - Name, gender and/or sex, date of birth, marital or domestic partner status, educational background, technical skills, professional certifications and registrations, language capabilities.
- Sensitive demographic and background data:
 - Information regarding ethnicity, sexual orientation and religion or church affiliation.
- Health information
 - Forms and information relating to health insurance, employee health and welfare/wellness benefits, medical conditions, accommodation requests and accident reports involving injuries.
- Personal Financial and payment data
 - Payroll/wage information and banking details, retirement savings data, salary history.
- Government identifiers and documentation:
 - Social security or other taxpayer/government identification number, residency and work permit status, military status, nationality, citizenship, visa and passport information.
- Operations Data
 - Clothing sizes, photographs, videos, information on CCTV, physical entry/exit logs. Any content featuring you produced for use on our website or social media such as videos, authored articles, blog posts and speech transcripts.
- Interaction data
 - SSO Logins, command line activity, admin privilege activity, actions taken in privileged and sensitive systems, date/time logs.
- Authentication data
 - Mozilla does not have access to your passwords, but does have information as to which applications and systems you have appropriate authentication to access.
- Technical data

- Details and serial numbers of devices you are provided with to perform your job, licenses, applications installed, access groups and access rights to privileged and sensitive systems.

Sensitive Personal Information

Sensitive Personal Information is a subset of Personal Information where higher standards or special restrictions apply, such as health/medical information, political opinions, religion, trade union membership, genetic data, biometric data, sexual orientation and race or ethnicity. We may collect or process certain types of Sensitive Personal Information with your explicit consent or as permitted by applicable law.

Data Integrity

We try to make sure that the Personal Information we hold about you is current, accurate, and complete so that we can use it reliably. You can always [correct your Personal Information](#) to help ensure the integrity and accuracy of the information we hold about you. It's important that you keep your Personal Information up to date and inform us of any significant changes.

Purpose Limitation

Mozilla will not use your Personal Information for any purpose that is incompatible with this Privacy Notice unless:

- It is required by law;
- It is separately authorized by you;
- It is in your own vital interest (e.g., in the case of a medical emergency);
- Or it is necessary in connection with a company structure change, such as a merger or divestiture.

What do we do with your Personal Information?

Mozilla uses your Personal Information in order to manage all aspects of your employment relationship with us. The types of activities include:

- Managing Mozillians. This means managing personnel and work activities, such as:
 - Human Resources functions (e.g. performance evaluation, absence reporting/monitoring, disciplinary actions, and career management), Finance and Benefits Administration (e.g. pay and benefits, obtaining/maintaining insurance, reimbursable expenses), and
 - We manage these functions using your Personal Information as part of our legal and contractual obligations, as your employer. We also have a legitimate business

interest in managing activities that use your information, such as in performance evaluations and career management planning.

- Business Operations. This means managing the variety of Mozilla's systems and functions, such as:
 - IT, communications and collaboration systems, products and services, allocating company and human resources, planning and reporting, detecting, preventing or otherwise addressing fraud, security, or technical issues.
 - We manage these systems and functions that use your information for our legitimate business interests in making sure Mozilla's business runs effectively and safely.
- Workplace Operations, Communications, & Emergencies. This means managing physical facilities and property and aiding communications between Mozillians, and includes:
 - Sending assets like laptops and swag to employees, video conferencing, employee directories, employee engagement programs, protecting the safety and security of all Mozillians, volunteers, community, guests, property, and assets, occupational safety and health programs and communicating with you and your nominated contacts in an emergency.
- Compliance Functions. This means complying with legal and other requirements, such as:
 - judicial or administrative orders regarding individual employees (e.g. child support payment), conflict of interest reporting, audits and risk management, internal investigations, immigration visa or work permit applications, employment and tax law, compliance with government inspections and other requests from government or other public authorities (see further Public and Governmental Authorities below).

We do not use your information for any automated decision-making or profiling that would create legal ramifications (or similar effects) for you.

Mozilla does not sell the Personal Information, including any Sensitive Personal Information, we collect about our Mozillians.

Corporate Data Transfer

Mozilla has its headquarters in the United States. When we collect or create information about you, it may be processed outside of the country where you reside, so it could be processed in a place that does not have the same level of data protection as the country where you live.

To provide common functional services across Mozilla (e.g. Phonebook, LDAP, All-Hands) we may share some Mozillian Personal Information with personnel of other companies within the

Mozilla corporate family, including MoCo, Mozilla Foundation (“MoFo”), and their subsidiaries. Mozilla entities have entered into an Intra-Group Data Processing and Transfer Agreement ("IGA"), which incorporates the Standard Contractual Clauses and enables Mozilla to comply with its obligations (under GDPR and similar legislation) when one Mozilla entity or branch transfers personal data to another Mozilla entity or branch. If you would like to see a copy of the IGA, please contact legalteam@mozilla.com.

Who do we share your information with?

Your Personal Information will be shared internally at Mozilla with the People Team, IT, Legal and other teams as required. All employees will generally have access to the type of business contact information that may be available in the Mozilla people directory.

We may also share your information with our affiliates, subsidiaries, and other third parties for the reasons described in the *What do we do with your Personal Information?* section above. For a list of the Mozilla affiliates that may jointly process and use Personal Information, see [here](#).

When we share Personal Information with Service Providers, we have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do so. Service Providers are companies who provide products or services to Mozilla:

- This typically includes services such as payroll, pension schemes, benefits providers, human resources services, performance and engagement management, training, expense management, IT systems suppliers and support, credit card companies, medical or health practitioners, and other service providers.
- We also use professionals who provide expert guidance and advice to Mozilla in countries where Mozilla operates, such as bankers, attorneys, accountants, auditors, lawyers, and insurers.

The other types of third parties we may share your information with are:

- Public and Governmental Authorities. These are entities that regulate or have jurisdiction over Mozilla, such as regulatory authorities, law enforcement, public bodies, and judicial bodies. Unless you have already provided your consent to share such information, Mozilla generally requires a valid Legal Process to compel the disclosure of Personal Information to a government authority; such as a legitimate and properly scoped court order, or a search warrant supported by probable cause and issued by an appropriate law enforcement authority. We interpret requests narrowly, and we will oppose unlawful or overbroad requests for specific Personal Information.
- Parties to Corporate Transactions. In a transaction where we may buy or sell other businesses or assets, employee information is generally one of the transferred business assets.

Third-Party Services

As noted above, Mozilla uses third-party service providers to perform services on our behalf, such as Workday for HR data, Expensify for receipts and reimbursements, and Navan for travel. In some cases, you may also take advantage of additional services that are available to employees, such as retirement plan administration or benefits enrollment administration. You may optionally choose to use some third-party applications such as Slack, Jira, LucidChart, etc., to aid, ease, or expedite your work.

The vendor's privacy policies govern the use of these services. To learn more about how data is handled by the application or service provider, please read the applicable privacy policy.

Security & Data Protection

To help protect the privacy of Personal Information in our care, we maintain reasonable and appropriate administrative, physical, and electronic safeguards. However, no security is perfect, so we cannot guarantee the security of your Personal Information.

Data Retention

Mozilla will retain and process personal data relating to you following your period of employment or engagement for the purposes of performing administrative tasks related to your employment or engagement, and for archival, record-keeping and legal purposes, in accordance with our customary HR and employment practices. Mozillian's personal data will generally be kept for seven (7) years after termination of employment or engagement, unless there are relevant legal reasons for which the data is required. After this period, we will take steps to delete your personal data or hold it in a form that no longer identifies you.

Your Rights

You can access, correct, or delete personal information as described below. Your ability to access, correct or delete personal information is not absolute. These rights are all subject to certain exceptions, in which case we will tell you why we cannot do what you are asking for. These rights include:

- Right to Know/Access. You have the right to request:
 - The categories of Personal Information we collected about you;
 - How we got that Personal Information;
 - Our purpose(s) for collecting, selling, or sharing that Personal Information;
 - The categories of third parties to whom we have disclosed that Personal Information; and

- A copy of the specific pieces of Personal Information we hold about you.
- **Right to Correct**. You have the right to request that we correct inaccuracies in your Personal Information (you can find more information about self-service functionality on [Confluence](#))
- **Right to Delete**. You have the right to request deletion of Personal Information that we have collected from you.
- **Right to Object**. You have the right to object to, or request the restriction of, the processing of your Personal Information that Mozilla uses for its legitimate interest.
- **Right to Opt-Out**. We have to inform you that Californians have additional rights under the California Consumer Privacy Act (“CCPA”), to opt-out of the “sale” or “sharing” of their Personal Information. However, we **do not sell or share** the Personal Information we collect from Mozillians.

Accessing Your Personal Information

We hold much of your Personal Information in our Human Resources Information System, [Workday](#). You can access this information at any time using your company credentials. If there is Personal Information you want to review, verify or correct that is outside Workday, please email employee-request@mozilla.com or submit a request [here](#). In the event we cannot provide you with access to your Personal Information, we will inform you of the reason(s) why, subject to any legal or regulatory restrictions.

Correcting Your Personal Information

If you believe your Personal Information is incorrect, incomplete, or outdated, you can usually correct that information directly (such as in [Workday](#)). If the information is in a system that does not provide you direct access, you may request the revision or correction of that information through email at employee-request@mozilla.com or by submitting a request [here](#).

If it is determined that Personal Information is inaccurate, incomplete or outdated, Mozilla will work to revise it. If necessary, we will also work to notify agents, service providers or other third parties who also have this information so records in their possession can be corrected or updated.

We reserve the right not to change any Personal Information Mozilla considers accurate.

Deleting Your Personal Information

You can request we delete the Personal Information that Mozilla holds about you. There are instances where applicable law or regulatory requirements allow or require us to refuse to delete this Personal Information. In the event we cannot delete your Personal Information, we will inform you of the reason(s) why, subject to any legal or regulatory restrictions.

If there is Personal Information you want to delete, please email employee-request@mozilla.com or submit a request [here](#). Any request by you to delete your Personal Information will not result in deletion of any information submitted directly by you to a third-party provider (e.g. Benefit Plan Administrator, placement firms etc.) If you require the third-party to delete any of your Personal Information that you submitted directly, you must contact the third party directly to request such deletion.

Objecting to (or requesting a restriction of) Processing

You can object to, or request the restriction of, the processing of your Personal Information that Mozilla uses for its legitimate interest. There are instances where applicable law or regulatory requirements allow or require us to refuse to restrict processing Personal Information.

Data Portability

You can move, copy, or transmit Personal Information you provided to Mozilla for processing related to our performance of your employment contract. Please email employee-request@mozilla.com or submit a request [here](#).

Defining Directives

In some places, such as France, you can define directives relating to the storing, deletion, and communication of your Personal Information following your death. This right only applies to your own Personal Information. You may define general or specific directives. You can modify or revoke those directives at any time. Contact your PBP for help with these requests.

Resolving Concerns/Questions/Contacts

If you have any questions or concerns regarding the handling of your Personal Information, please contact your PBP. Alternatively, you may report complaints or concerns to employee-request@mozilla.com.

Europeans who believe a privacy complaint is unresolved have the right to lodge a complaint with Mozilla's Data Protection Officer at dpo@mozilla.org by mail at the following address: Bird & Bird DPO Services SRL, Avenue Louise 235 b 1, 1050 Brussels, Belgium. You may also contact the supervisory authority of your Member State; in the UK, this will be the Information Commissioner.

Changes to Privacy Notice

We may change this Privacy Notice at any time. The effective date of each version of this Privacy Policy is identified above.

Other HR Related Policies

[People Resources Policy](#)

[Mozilla Company Systems Use Policy](#)

[Community Participation Guidelines](#)

[Work Rules: Taipei](#)

[France Policies](#)

[Employee Privacy Notice Translations](#)

[French](#)