LinkedIn's processing on the basis of legitimate interests

LinkedIn will only collect and process personal data about you where we have a lawful basis to do so, in accordance with the General Data Protection Regulation ("GDPR"). Our basis for processing your personal data varies depending on the purpose for which we are using the data. For example, in some cases we obtain your consent, in others we are legally obligated to process your data for a certain purpose and in some cases, we rely on our legitimate interests. Below we have explained when we rely on legitimate interests and what those interests are.

When does LinkedIn rely on legitimate interests?

In some cases, the collection and processing of your personal data is based on our legitimate interests or the legitimate interests of third parties (e.g., LinkedIn Customers), provided that our interest in processing does not outweigh your interests. These interests include commercial interests, the interests of our Members or broader societal benefits. In each instance, we have considered whether these interests are outweighed by your rights and freedoms, and have concluded, based on the limited impact of the processing, the strong safeguards we apply, and the controls we offer you over your data, that we can proceed with the processing.

If you have questions about how LinkedIn processes your personal data, you can view our <u>Privacy Policy</u>, the many articles and resources on our <u>Help Center</u> or you can <u>Contact us</u>.

How we use your data	Legitimate interests relied on	Personal data used
To help protect you, us, or others from threats, we log users' activity on LinkedIn to identify and investigate harmful or fraudulent behaviour that violates our User Agreement. Examples of this behaviour include: security threats, hacks, scraping, fake accounts and information, bots, malicious actors, or fraud to verify certain information you have provided e.g. your workplace, educational	 To improve the safety, security, authenticity of our services To better protect the personal data of our Members and Visitors To detect and address bad actors and malicious activity on LinkedIn 	 Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from Cookies and other similar technologies Your account information including your email address, login and two-step verification information, payment and subscription information Data that you or others provide in your LinkedIn profile, such as your

- institution or your identity
- Sharing data with our parent company, Microsoft to combat harmful or fraudulent behaviour and to protect the security and integrity of our site
- Using automated systems such as generative AI to detect and prevent harmful content on your feed and in messages
- To verify your account following account restriction or closure for breaches of our User Agreement

- name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your activity data including data that you or others provide in messages, posts, comments, articles, or other content on our services
- Your account information including payment and subscription information
- Data that you provide when you contact us or request support via email, our ticket system or live chat. This may include your name, email address, LinkedIn account details, phone number, payment information and the details of your query or issue
- Inferences we make about you
- Your connections and group memberships
- Reports from you, or reports that others make about you relating to possible violations of <u>LinkedIn's</u> <u>User Agreement</u> or <u>Professional</u> Community Policies.
- Your verification badge and verification information when you have verified certain information on the platform
- Government ID and other personal identification

documentation for account recovery purposes

Business administration:

- Enable or administer our business, such as for quality control, preparing consolidated reports on our business, and Customer service
- Manage corporate transactions, such as mergers, acquisitions or sales
- Monitor and produce reports on the effectiveness of our Customer support services
- Producing reports and metrics on how our services are used to help evaluate product performance, fix issues, improve and deliver our services
- Understanding and improving our business or Customer relationships generally
- Making business and financial projections
- Transferring Member and Customer data to be processed and stored in LinkedIn Corporation's data centres in the US

- To run our business efficiently and effectively
- To comply with laws regarding business operations, consumer protection and tax compliance
- To fulfil the expectations of our Members, Visitors, and Customers about the high quality of our services
- To grow, strengthen and otherwise manage our business and assets
- To enhance and grow our business, meet the needs of our Visitors, Members and Customers, and better ensure that our Members, Customers and Visitors receive quality services from LinkedIn
- Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from <u>Cookies</u> and other similar technologies
- Your account information including payment and subscription information
- Data that you provide when you contact us or request support via email, our ticket system or live chat. This may include your name, email address, LinkedIn account details, phone number, payment information and the details of your query or issue
- Information received by post at any of our LinkedIn offices worldwide
- Data that you or others provide in your LinkedIn profile, such as your name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your activity data including data that you or others provide in messages, posts,

- comments, articles, or other content on our services
- Your connections and group memberships
- <u>Inferences we make</u> about you
- <u>Personal demographic</u> data
- Reports from you, or reports that others make about you relating to possible violations of <u>LinkedIn's</u> <u>User Agreement</u> or <u>Professional</u> Community Policies.
- Data about your use of some of the other services provided by us or our affiliates, including Microsoft

Personalising your LinkedIn experience:

- LinkedIn uses
 information you've
 provided, and
 information inferred
 from you and your
 network to personalise
 content and
 recommendations.
 LinkedIn may use
 profiling techniques to
 achieve these purposes.
- These include seeing posts and people that we think might interest you on your LinkedIn feed
- Making suggestions for how you can expand your network by recommending connections, groups and topics you may like to follow or contribute to
- Recommending jobs

- To fulfil our mission to connect the world's professionals to make them more productive and successful
- Create economic opportunity for our Members, Customers and Visitors
- Enable our Members and Visitors to make real world connections with each other, find jobs and economic opportunity, express opinions, exchange information, and conduct business
- To meet LinkedIn's Customers' interests in ensuring they can advertise jobs, products or services to Members that will be interested in them
- Providing Members with access to business

- Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from <u>Cookies</u> and other similar technologies
- Data that you or others provide in your LinkedIn profile, such as your name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your activity data including data that you or others provide in messages, posts, comments, articles, or

- Displaying personalised ads
- Providing personalised features to Customers in LinkedIn subscription services such as LinkedIn Premium
- Allowing LinkedIn
 Customers to search for and contact Members that may be interested in purchasing products or services
- Allowing LinkedIn
 Customers to search for
 job candidates who
 match their job criteria
 and contact Members
 directly about job
 opportunities

- development opportunities derived from B2B marketing
- Connecting Members with jobs and opportunities to match their skills, experience and career aspirations
- other content on our services
- Your connections and group memberships
- <u>Inferences we make</u> about you
- Personal demographic data

Law enforcement and legal requests:

- To disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary for any of the following reasons:
- to investigate, prevent or take action regarding suspected or actual illegal activities or to assist government enforcement agencies
- enforce our agreements with you
- investigate and defend ourselves against any third-party claims or allegations
- protect the security or integrity of our Services

- To advance the legitimate interests of our wider community (including Members, Visitors and Customers) to comply with the law
- To avoid sanctions for non-compliance
- To better protect against illegal or harmful activity in connection with our services
- Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from <u>Cookies</u> and other similar technologies
- Data that you or others provide in your LinkedIn profile, such as your name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your activity data including data that you or others provide in messages, posts, comments, articles, or

- (such as by sharing with companies facing similar threats)
- exercise or protect the rights and safety of LinkedIn, our Members, personnel or others

- other content on our services
- Your connections and group memberships
- Your communications with LinkedIn, including information received by post at any of our LinkedIn offices worldwide

Legal advice and litigation:

- We retain and share information with our lawyers and relevant experts when we seek legal advice or are involved in litigation, regulatory inquiries or disputes
- LinkedIn's interest to protect LinkedIn and its affiliates, their brands, employees and business interests from legal challenges, regulatory investigations or criminal activity
- To better protect the interests of our Members, Visitors and Customers by identifying and addressing illegal, unfair or harmful activity
- Any data relating to you that is relevant to the legal advice, possible litigation or ongoing litigation. This will depend on the nature of the legal issue and could involve any information related to your use of LinkedIn's products and services

Research development and addressing errors:

- To review our products, conduct research and introduce new product features that help us better serve our Members and Customers. We may generate metrics to understand how our services are used, to inform and improve product direction and development. For example, we may measure how many users visit a certain page, how long they
- To help us connect people to economic opportunity in new ways and by partnering with governments and organizations around the world.
- To fulfil our mission to connect the world's professionals to make them more productive and successful
- Create economic opportunity for our Members and Visitors
- To understand how people use our services and what new features they like, so we can improve existing

- Personal demographic data
- Your connections and group memberships
- Inferences we make about you
- Data that you or others provide in your LinkedIn profile, such as your name, photo, current position, education, location, skills, endorsements, recommendations, skills and contact details
- Your activity data including data that you or others provide in messages, posts, comments, articles, or

- stay, or what actions they take on that page
- We may undertake testing to evaluate the impact of new features
- We may invite you to take surveys or provide feedback and analyse your responses to gain insights into users' views, preferences, needs, or experiences with our Services and to identify corrections and/or improvements for our products
- We produce aggregate insights to deliver data on global workforce trends, to measure and improve equality
- We provide access to third party researchers who may conduct research regarding online safety and other areas where LinkedIn is required to
- To identify and report aggregated trends like talent migration, hiring rates, and in-demand skills by region using <u>LinkedIn's Economic</u> <u>Graph</u>

- features and create more useful products in the future
- In furtherance of our legal and other obligations to provide safe, secure, fair and legal service
- other content on our services
- Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from <u>Cookies</u> and other similar technologies

To display and deliver personalised ads:

- To display and deliver certain ads that are relevant to your interests and preferences, based on the data we collect from our services
- To show you ads while you visit websites or
- To provide you with more personalized and relevant ads, and to help our Customers reach the right audience for their products and services
- Furthering our efforts to provide you with ads that are more likely to contain content you are interested in, which
- Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from Cookies and other similar technologies

apps on the LinkedIn Audience Network

- advances our legitimate interests and those of our Members in providing a revenue source that better enables us to offer many services free of charge to our Members
- To meet our Customers' interests in advertising jobs, products or services to Members that are likely to be interested in them
- Data that you or others provide in your LinkedIn profile, such as your name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your activity data including data that you or others provide in messages, posts, comments, articles, or other content on our services
- Your connections and group memberships
- <u>Inferences we make</u> <u>about you</u>
- Personal demographic data.
- Actions by Members with similar profiles to yours
- Third party requests to show ads to LinkedIn members

When we use personal data provided by third parties such as LinkedIn Customers to show you ads, we require opt-in **consent** from residents of the European Union, EEA, or Switzerland. You can control how we use your personal data for this type of advertising **here**.

To provide analytics and insights:

- To measure and optimize ad delivery and engagement so that we can create aggregated reports (that don't identify you) for our Customers on the performance and effectiveness of their ads and other informational and promotional activities
- To help our Customers measure and improve the impact and relevance of their ads, and to provide them with valuable information about the types or categories of professionals they want to connect with
- To support Customers' interests in understanding the categories of professionals that
- Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from <u>Cookies</u> and other similar technologies
- Data that you or others provide in <u>your LinkedIn</u> profile, such as your

- on our services, and the characteristics of the audiences they reach
- To create aggregated reports for our Customers on how Members interact with their ads on and off LinkedIn and their informational and promotional activities on our services

engage with their content without identifying individual Members. In turn, this helps Customers adapt their content to make them more suitable for the types of professionals they are interested in connecting with

- name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your activity data including data that you or others provide in messages, posts, comments, articles, or other content on our services
- Your connections and group memberships
- <u>Personal demographic</u> data
- Data about actions you took <u>in response to ads</u> (such as visits to websites or product purchases)

Generative AI tools and search

- Members or Customers may provide personal data as an input to a generative AI feature and/or our search features, which could result in personal data being provided as an output
- Automatically processing your profile data as an input for a generative AI powered feature (e.g. providing more relevant responses to your queries or in connection with your inputs to a generative AI feature)
- Using Members' feedback to improve, correct or modify our products, including for

- To enable economic opportunity and help our Members and Customers be more productive and successful
- To enhance the safety and security of our platform
- To improve the efficiency and effectiveness of providing our services
- Personal data manually input into an AI powered feature by Members
- Feedback you provide on AI features
- Data that you or others provide in a resume you provide or your <u>LinkedIn profile</u>, such as your name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your connections and group memberships
- Your activity data including data that you or others provide in messages, posts, comments, articles, or other content on our services

- generative AI powered features
- Using automated techniques, including generative AI powered tools as part of our online safety and security efforts

Direct Marketing:

- emails and other marketing emails and other marketing communications about LinkedIn content, products or offers that we think will interest you
- Promoting LinkedIn subscription services and other products and features we think you'd like on and off LinkedIn
- To enable economic opportunity and help our Members be more productive and successful
- To enhance and grow our business, meet the needs of our Visitors, Members and Customers, and better ensure that our Members, Customers and Visitors receive the quality services from LinkedIn
- Data relating to your use of our services, such as IP address, device ID, user agent, location data, browser type and version, operating system and platform, and other online identifiers collected from <u>Cookies</u> and other similar technologies
- Data that you or others provide in your LinkedIn profile, such as your name, photo, current position, education, location, skills, endorsements, recommendations, and contact details
- Your activity data including data that you or others provide in messages, posts, comments, articles, or other content on our services
- Your email address
- Your connections and group memberships
- Inferences we make about you
- Personal demographic data

Objecting to the processing of your personal data

LinkedIn's processing of your data is subject to the relevant <u>Member</u> and <u>Guest</u> settings, opt-outs and <u>preferences</u>.

If you are a LinkedIn Member or Guest living in the European Economic Area, the UK or Switzerland, you have the legal right to object at any time to the processing of your personal data where LinkedIn relies on legitimate interests as the legal basis for the processing activity. Where you raise such an objection, we will consider your request, our legal obligations, and whether we have a compelling interest in continuing to process your data. In certain cases, consistent with your legal rights and our obligations, we may not be able to fulfil your request—for example, we cannot stop processing your IP address when it is used to authenticate your login details, as this is a security measure that is essential to protect our site. In contrast, you can remove information about your education or work experience from your profile (although as a result, the job recommendations you receive may not be relevant to you) so that we don't process it. If you wish to object, you may do so using this form