

EMPLOYEE PRIVACY NOTICE

1. About this notice.

- 1.1 This privacy notice outlines how we, as your employer and a "data controller," collect, manage, and utilize your personal information. As a data controller, we are responsible for determining the purposes and means of processing your personal data. This notice is provided in compliance with data protection legislation, ensuring you are informed about how your personal information is handled and safeguarded by us.
- 1.2 We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical. It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

2. Data Protection Principles.

- 2.1 We will comply with data protection law. This says that the personal information we hold about you must be:
 - a. Used lawfully, fairly and in a transparent way.
 - b. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - c. Relevant to the purposes we have told you about and limited only to those purposes.
 - d. Accurate and kept up to date.
 - e. Kept only as long as necessary for the purposes we have told you about.
 - f. Kept securely.

3. The Kind of Information We Hold About You.

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified.
- 3.2 We will collect, store, and use the following categories of personal information about you:
 - a. Personal contact details such as name, title, address, telephone number, personal email addresses.
 - b. Date of birth.
 - c. Copy of passport or identity card which is required, inter alia, when we are arranging and/or renewing your visa (and for any other immigration purposes) when you are a non-EU national, for the purposes of keeping a record of your date of birth for the provision of birthday benefits etc. or any identification documents related to the Anti Money Laundering and Anti-Terrorist Financing Act.
 - d. Marital status and dependents, where this information is required for the purposes of arranging and/or renewing your visa (and for any other immigration purposes), if applicable.
 - e. National Insurance number or social security number.
 - f. Bank account details, payroll records and tax status information.
 - g. Salary, annual leave, pension and benefits information.

- h. Start date and, if different, the date of your continuous employment, leaving date and your reason for leaving. Location of employment or workplace.
 - i. Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
 - j. Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
 - k. Performance information.
 - l. Disciplinary and grievance information.
 - m. Footage of cameras placed at key locations of certain of our locations for the purposes of security monitoring.
 - n. Information about your use of our information and communications systems including your IP addresses.
 - o. Personal data included in your work email inbox.
- 3.3 We may also collect, store and use the following “special categories” of more sensitive personal information:
- a. Information about your race or ethnicity or religious beliefs where this is required for applicable law, such as immigration and visa purposes, only;
 - b. Information about your health, including any medical condition, health and sickness records, in the following instances:
 - where you leave employment and the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision;
 - where you have specifically consented to us assisting you in facilitating the process of filing your claims for compensation from the medical insurance provider, provided to you through your employment with us, by making copies of the claim forms and retaining these for a limited time and providing such forms directly to the provider for your own ease; and
 - details of any absences (other than holidays) from work including time on statutory leave and sick leave.

4. How Is Your Personal Information Collected?

- 4.1 We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider and directly from you at the start of employment as well as during the employment.

5. How We Will Use Information About You.

- 5.1 We will only use your personal information when the law allows us to, as set out below:
- a. Where we need to perform the contract we have entered into with you.
 - b. Where we need to comply with a legal obligation.
 - c. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 5.2 The situations in which we will process your personal information are listed below (please note this is not an exhaustive list):

- a. Making a decision about your recruitment or appointment and determining the terms on which you work for us.
 - b. Checking you are legally entitled to work in the country where you will be employed and arranging to obtain and/or renew your visa for the right to work and any other immigration purpose, including the use of the personal data of your spouse and dependents where we will also be arranging their visas.
 - c. Administering and managing your employment lifecycle, payroll, benefits enrolment and administration, IT provisioning and core HR functions including performance, employee file etc., through the use of a third-party integrated platform, namely Rippling (Rippling Inc. and its affiliates).
 - d. Paying you and providing you with reimbursements and if you are an employee or deemed employee for tax purposes, deducting tax and social security or National Insurance contributions as appropriate. This may be facilitated by a third party, such as Rippling's payroll module, if this is available in the country of your employment, which processes salary, tax and bank details and in all other respect by third party payroll service providers in the country of your employment.
 - e. Business management and planning, including HR, payroll and related financial data are managed/recorded within the Rippling system for these purposes,
 - f. Conducting performance reviews, managing performance and determining performance requirements. Making decisions about salary reviews and compensation, including decisions about promotions.
 - g. Gathering evidence for possible grievance or disciplinary hearings.
 - h. Making arrangements for the termination of our working relationship.
 - i. Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
 - j. Managing sickness absence.
 - k. To monitor your use of our information and communication systems to ensure compliance with our IT policies, confidentiality policies and software licenses
 - l. To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
 - m. We may need to gain access to your work email inbox, while you are employed with us or after the end of your employment for the limited purposes of ensuring the proper functioning of our business and investigating possible offenses or acts of misconduct of any nature.
 - n. If you fail to provide personal information.
 - o. If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations.
 - p. Change of purpose.
 - q. To ensure that you are complying with any applicable laws and regulations.
- 5.3 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the

original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

- 5.4 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Data Sharing.

- 6.1 We share your personal data with third party service providers such as Rippling (Rippling, Inc. and its affiliates), which act as our processor to administer various aspects of your employment, including HR and performance management, payroll processing (to the effect this service is offered in the country where you are employed), benefits enrolment, and IT management (e.g., device and application access), for the purposes for which the personal data was originally collected as set out above.
- 6.2 We require third parties to respect the security of your data and to treat it in accordance with the law. We do not sell your data or allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions always subject to a written agreement in accordance with applicable privacy laws. We might also have to share your data with other entities in our Company as part of our regular reporting activities on company performance, for system maintenance support and hosting of data or as otherwise necessary in the context of an actual or contemplated business reorganization or group restructuring exercise. In the instances where your personal data shall be transferred outside of your home country for any reason, we shall ensure that such transfer shall be in compliance with applicable data protection laws.

7. Data Security.

- 7.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those individuals who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. Data Retention.

- 8.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Rights Of Access, Correction, And Restriction.

- 9.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.
- 9.2 Under certain circumstances, by law you have the right to:

- a. Request access to your personal information (commonly known as a “Data Subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- b. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- c. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- d. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- e. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- f. Request the transfer of your personal information to another party.
- g. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact px@cloudonedigital.com in writing.
- h. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact px@cloudonedigital.com.

10. Data Privacy Manager.

10.1 We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact px@cloudonedigital.com. You have the right to make a complaint at any time at the national supervisory authority should you wish to do so.

11. Changes To This Privacy Notice.

11.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.