

**SAMSUNG SDS AMERICA, INC.**  
**PRIVACY POLICY AND NOTICE AT COLLECTION**  
**FOR**  
**EMPLOYEES, INDEPENDENT CONTRACTORS, AND APPLICANTS**

This **Privacy Policy and Notice at Collection for Employees, Independent Contractors, and Applicants** (this “**Policy**”) applies to all employees, contractors, and applicants (“**personnel**”, “**you**”, or “**your**”) of Samsung SDS America, Inc. (“**SDSA**”, “**we**”, “**our**”, or “**us**”) who reside in the State of California. Any terms defined in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (as amended, the “**CPRA**”), have the same meaning when used in this Policy.

SDSA collects and uses Personal Information of personnel for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance.

**Collected Personal Information**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, household, or device (“**Personal Information**”). Personal Information does not include:

- Publicly available government records;
- Deidentified or aggregated information; and
- Information excluded from the CPRA’s scope or covered by sector-specific privacy laws.

In the past 12 months, we have collected the following categories of Personal Information from personnel:

- Identifying information, e.g. name, gender, date of birth, signature, Social Security numbers, passport and visa information, and immigration status and documentation;
- Demographic data, e.g. racial or ethnic origin, marital status, and veteran or military status;
- Contact information, e.g. home address, telephone numbers, and email addresses;
- Dependent's or family members’ information;
- Educational and professional background, e.g. work history, academic and professional qualifications, educational records, references, and interview notes;
- Employment details, e.g. job title, position, hire dates, compensation, performance and disciplinary records, and vacation and leave information;
- Financial information, e.g. banking details, tax information, and payroll information;
- Health and safety information, e.g. health conditions relevant to your employment, job restrictions, workplace illness and injury information, and health insurance policy information;
- Information systems use information, e.g. your search history, browsing history, login information, and IP addresses on SDSA's information systems and networks;
- Geolocation data;
- Sensory/surveillance information, e.g. COVID-19 related checks and video surveillance; and
- Summaries of your characteristics, attitudes, abilities, and aptitudes.

We obtain the categories of Personal Information listed above directly (e.g. completed forms) or indirectly (e.g. based on your use of SDSA's information systems) from you, and from our affiliates, vendors who provide services to us, and social media networks.

**Purposes of Collection, Use, and Disclosure**

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To comply with applicable laws and regulations.
- To recruit and evaluate job applicants and candidates for employment.
- To conduct background checks.
- To manage your employment relationship with us, including for:
  - onboarding processes;
  - timekeeping, payroll, and expense report administration;
  - employee benefits administration;
  - employee training and development requirements;
  - the creation, maintenance, and security of your online employee accounts;
  - reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
  - workers' compensation claims management;
  - employee job performance, including goals and performance reviews, promotions, discipline, and termination;
  - matching the skills of personnel with SDSA business needs; and
  - other human resources purposes.
- To manage and monitor personnel access to SDSA facilities, equipment, and systems.
- To conduct internal audits and workplace investigations, and to investigate and enforce compliance with and potential breaches of SDSA policies and procedures.
- To engage in corporate transactions requiring review of personnel records.
- To maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- To perform workforce analytics, data analytics, and benchmarking.
- To administer and maintain SDSA's operations, including for safety purposes.
- For client marketing purposes.
- To exercise or defend the legal rights of SDSA and its employees, affiliates, customers, contractors, and agents.

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different or incompatible purposes without providing you notice.

For each category of collected Personal Information listed above, we will retain the Personal Information for only as long as it is reasonably necessary to achieve the purposes described above.

### **Disclosing Personal Information**

We may disclose your Personal Information to a third party (including our parent company) for a business purpose. In the past 12 months, SDSA has disclosed Personal Information to our service providers and affiliates for our operational business purposes.

We do not sell your Personal Information. We have not sold Personal Information in the past 12 months.

### **Your CPRA Rights**

The CPRA provides you with certain rights regarding your Personal Information, as summarized in part below. We will never discriminate against you for exercising any of your CPRA rights.

#### ***Right to Know***

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months (the “**right to know**”). Once we receive your request and confirm your identity (see “How to Exercise Your Rights” below), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources from which we collected the Personal Information.
- Our business purpose for collecting the Personal Information.
- The categories of third parties with whom we disclose the Personal Information.
- A list describing any disclosures of the Personal Information for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- The specific pieces of Personal Information we collected about you (this is also known as a “**data portability request**”).

You may only submit a request to exercise your right to know twice within any 12-month period.

#### ***Right to Delete***

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions (the “**right to delete**”). We may deny your deletion request if retaining the information is necessary for us or our service provider(s) for the following reasons:

1. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
2. The Personal Information is needed for HR purposes, such as for payroll and health care.
3. To perform a contract between SDSA and the personnel.
4. To retain Personal Information contained in security logs to satisfy compliance requirements and litigation holds.
5. To comply with laws applicable to SDSA.

6. To exercise legal rights or defend against possible legal claims.

We will delete or deidentify Personal Information that is not subject to one of these exceptions from our records and will direct our service providers to do so.

***Right to Correct***

You have the right to request that SDSA correct inaccurate Personal Information we have about you, taking into account the nature of the Personal Information and the related business purpose. Once we receive your request and confirm your identity, SDSA will use commercially reasonable efforts to correct the inaccurate Personal Information that your request identifies.

**How to Exercise Your Rights**

To exercise your rights under the CPRA as described above, please submit a request by emailing us at [legal.sdsa@samsung.com](mailto:legal.sdsa@samsung.com). Only you, or someone legally authorized to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your child.

Your request must provide information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative and to adequately understand and respond to it. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

We will only use Personal Information provided in the request to verify the requestor’s identity or authority to make it.

***Response Timing and Format***

We will confirm receipt of your request within 10 business days. If you do not receive confirmation within the 10-day timeframe, please contact SDSA Legal ([legal.sdsa@samsung.com](mailto:legal.sdsa@samsung.com)).

We endeavor to substantively respond to a verifiable request within 45 days of its receipt. If we require more time up to another 45 days, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. If you do not specify a preference, we will do so electronically.

Any response we provide will only cover the 12-month period preceding our receipt of your request, and will explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable.

We do not charge a fee to process or respond to your verifiable request unless it is manifestly unfounded or excessive. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

**Changes to this Policy**

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will make the updated Policy available and update this Policy’s effective date.

**Contact Information**

If you have any questions or comments about this Policy, please contact SDSA Legal at:

**Email:** [legal.sdsa@samsung.com](mailto:legal.sdsa@samsung.com)

**Postal Address:**

100 Challenger Road, 6<sup>th</sup> Floor

Ridgefield Park, NJ 07660

Attn: General Counsel

If you need to access this Policy in an alternative format due to having a disability, please contact SDSA Legal ([legal.sdsa@samsung.com](mailto:legal.sdsa@samsung.com)).