



HR PRIVACY POLICY

*TO BE POSTED AND KEPT CURRENT ON ZASIO'S CAREER WEB PAGE AND
ZNET*

HR Privacy Policy

Policy Owner: Vice President of Human Resources

Last Updated: July 1, 2024

Introduction

At Zasio Enterprises, Inc.¹, we respect the privacy of our employees, former employees, and job applicants². This policy describes (i) the Personal Information Zasio collects from or about you as part of its business operations; (ii) how we use that information; (iii) to whom we disclose that information; and (iv) how long we retain that information. Zasio requires all personnel treat personal information as confidential and in conformance with this policy.

What is Personal Information?

For this policy “**Personal Information**” means any information that relates to you and identifies you personally, either alone or in combination with other information available to us. Personal Information includes information considered “personal information,” “personal data,” and similar terms defined under applicable data privacy law.

Examples of Personal Information include your name, address, telephone number, email address, date of birth, government issued ID numbers such as your social security or driver’s license number, and marital status. Zasio collects your Personal Information when it’s: (i) necessary for our business purposes, and (ii) disclosed in connection with your application for employment as well as any employment with us.

Policy of Compliance

Zasio seeks to comply with all applicable data privacy laws. A person’s legal privacy rights, however, are often different across states and other jurisdictions. If you have any questions concerning this policy or your rights under any applicable data privacy law, please email human resources.

What Personal Information Do We Collect?

Zasio collects, maintains, and shares different types of Personal Information concerning its personnel, former personnel, and job applicants. This includes:

- Identifiers:
 - Name
 - Alias
 - Address

¹ (“we,” “our,” “us,” and “Zasio”)

² (collectively, “you”)

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- IP address
- Email address
- Government issued ID numbers (SSN and driver's license)
- your job application
- age
- medical condition
- marital status
- information about family members in connection with employer-sponsored insurance
- information regarding your interaction with the internet
- references and interview notes;
- photographs and video;
- offer letters and acceptance of employment;
- payroll information, including but not limited to government issued ID numbers, bank account information, and pay deposit information;
- wage and benefit information;
- usernames and passwords;
- insurance policy information;
- beneficiary and emergency contact information;
- background screening information;
- employment history;
- drug and alcohol screening results; and
- performance information (including management metrics, appraisals, and feedback).

In limited circumstances, Zasio may need to collect from you and process certain sensitive Personal Information, such as health information, financial data, or data about race or religion when required by law or to the extent doing so is necessary to carry out our employment obligations to you. Such sensitive Personal Information will be treated with the utmost care and in accordance with all applicable laws.

As a federal contractor/subcontractor, Zasio is required to solicit certain information from job applicants and employees pursuant to certain governmental recordkeeping and reporting requirements for the administration of civil rights laws, including the Jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA), and Section 503 of the Rehabilitation Act. This information includes sex, ethnicity, race, protected veteran status, and disability status. This information is collected for U.S. government statistical purposes and is not used for personnel decisions, and will not be kept with your personnel file or application.

Zasio collects most Personal Information directly from you. When Personal Information we collect about you is held by a third party (such as information held by the government or government institutions or when performing a background check), we will generally seek your permission before requesting this information. Zasio also takes reasonable steps to ensure any third parties we use to collect Personal Information have represented to us that they have the right to disclose your Personal Information.

Where required by law, we may collect your Personal Information without your knowledge or consent.

How Do We Use Personal Information?

Zasio uses and discloses your Personal Information for our business purposes, including establishing, managing or terminating your employment relationship with us. These include:

- contacting and managing our relationship with you;
- determining eligibility for employment, including verifying references and qualifications;
- administering pay and benefits;
- processing employee work-related claims (such as worker's compensation or insurance claims);
- establishing training and development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- gathering evidence for disciplinary action or termination;
- establishing an emergency contact point (such as next of kin);
- complying with applicable labor and employment laws;
- compiling directories;
- ensuring the security of company-held information; and
- any other purpose reasonably required by Zasio in connection with your employment.

We may use your Personal Information without your knowledge or consent where required by applicable law or regulatory requirements.

Monitoring

An employee's work product, whether in physical record, computer files, or other storage format belongs to Zasio, and that work product, and the tools used to generate that work product, are always subject to review and monitoring by Zasio.

When Do We Disclose Your Personal Information?

Zasio may share your Personal Information with our employees, contractors, consultants, and others who require this information to assist us with establishing, managing, or terminating your employment or who administer employer-sponsored benefits. Zasio also shares limited Personal Information (such as business

contact information) with its service providers, customers, and prospects when doing so is required in connection with marketing or providing our products and services or in connection with Zasio's operations. When Zasio shares Personal Information with these parties, we typically require they only use or disclose this information when necessary to carry out the purpose that requires this information.

Further, your Personal Information may be disclosed:

- as permitted or required by applicable law or regulation (and we strive not to disclose more Personal Information than required under the circumstances);
- to comply with valid legal processes (such as search warrants, subpoenas, or court orders);
- to protect Zasio's rights and property (including with respect to our products and services);
- during emergency situations or where necessary to protect another's safety;
- with your consent (where such consent is legally required).

We do not sell your Personal Information to third parties. We also will not use the Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

How Your Personal Information Is Protected

Zasio takes precautions including organizational, technical, and physical measures to help safeguard against accidental or unlawful destruction, loss, alteration, and unauthorized disclosure of, or access to, data and information we process or use. Zasio's efforts to protect your Personal Information includes limiting access to Personal Information to those with a need-to-know basis. These safeguards are designed to protect your Personal Information from loss and unauthorized access, copying, use, modification, or disclosure.

Despite these safeguards, no method of transmission or storage is fully secure. Zasio will notify you in accordance with applicable laws of any unauthorized access, use, disclosure, breach, theft, loss, corruption, or destruction of your Personal Information.

How Long is Your Personal Information Retained?

Zasio keeps records of your Personal Information no longer than necessary for the purpose for which we obtained it and for any other permitted compatible purposes, including compliance with legal obligations or to assert our legal rights or defend against a legal claim. Zasio's records retention schedule documents the applicable minimum retention periods for the various categories of records that contain your personal information. Zasio's current records retention schedule is available to employees through the company's intranet page.

We may retain your Personal Information for longer than the retention period if doing so is necessary to help Zasio support or defend against a legal claim or to otherwise assert a legal right.

Business Transfers

Zasio may transfer your Personal Information to a third party if we undergo a merger, acquisition, bankruptcy, or other transaction in which that third party assumes control of our business. If one of these

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events happens, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security practices.

Access to Your Personal Information and Deletion of Your Personal Information

Zasio is committed to complying with all applicable data protection laws in connection with your personal information. Where legally required, Zasio will provide you with all applicable legal rights, such as any right to access, with respect to your personal information.

Updates

Zasio regularly reviews and updates all of our company policies, including this policy. To stay up to date on our privacy practices, we encourage you to regularly review this policy (on Zasio's website or via Zasio's intranet where applicable).

Version	Date	Description	Author	Approved by
1.0	February 14, 2022	First Version (ISMS)	Legal Counsel and VP of Human Resources	Cindy Zasio, VP of Operations and Human Resources
v.May 2023	May 31, 2023	Annual ISMS Update	Legal Counsel and VP of Human Resources	Cindy Zasio, VP of Operations and Human Resources
v.July 2024	July 1, 2024	Annual ISMS Update	Legal Counsel and VP of Human Resources	Cindy Zasio, VP of Operations and Human Resources