



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: October 8, 2025

Introduction

At Zasio Enterprises, Inc., we value the privacy of our employees, former employees, and job applicants. This policy outlines:

1. The personal information we collect;
2. How we use it;
3. With whom we share it; and
4. How long we retain it.

All personnel must treat personal information as confidential and comply with this policy.

What is Personal Information?

In this policy, “personal information” means any data that identifies you personally, either on its own or when combined with other information we hold. This includes terms like “personal data” as defined under applicable privacy laws.

Examples include your name, address, phone number, email, date of birth, government-issued ID numbers (e.g., Social Security or driver’s license), and marital status.

Zasio collects Personal Information when:

1. It is necessary for business purposes; and
2. You provide it during your employment application or while employed with us.

Policy of Compliance

Zasio complies with all applicable data privacy laws. Because privacy rights vary by state and jurisdiction, your specific rights may differ.

If you have questions about this policy or your rights under any data privacy law, please contact Human Resources.

What Personal Information Do We Collect?

Zasio collects, maintains, and shares various types of Personal Information about employees, former employees, and job applicants, including:

- **Identifiers:** Name, alias, address, IP address, email, Social Security number, driver’s license number,

- **Application and employment data:** Job application, offer letters, employment acceptance, employment history, payroll and wage details, benefit information, usernames and passwords.
- **Personal details:** Age, marital status, medical condition, family member information (for insurance purposes), beneficiary and emergency contact information.
- **Digital and interaction data:** Internet usage information, photographs, video.
- **Screening and performance:** References, interview notes, background checks, drug and alcohol screening results, performance reviews, management metrics, and feedback.
- **Financial and insurance information:** Bank account details, pay deposit information, insurance policy information.

This information is collected as needed for business operations and employment-related purposes.

In limited cases, Zasio may collect and process sensitive Personal Information—such as health data, financial details, or information about race or religion—when required by law or necessary to fulfill employment obligations. This information is handled with the highest care and in full compliance with applicable laws.

As a federal contractor/subcontractor, Zasio is required to request certain information from job applicants and employees to meet government recordkeeping and reporting requirements under civil rights laws, including the Jobs for Veterans Act (38 U.S.C. 4212) and Section 503 of the Rehabilitation Act. This includes sex, ethnicity, race, protected veteran status, and disability status. This data is used solely for U.S. government statistical purposes, is not used in employment decisions, and is not stored with your personnel file or application.

Zasio primarily collects Personal Information directly from you. When information is held by a third party—such as government agencies or background check providers—we generally seek your permission before requesting it. We also take reasonable steps to ensure that any third parties we engage have the legal right to share your Personal Information.

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

How Do We Use Personal Information?

Zasio uses and shares Personal Information for business purposes, including managing your employment relationship. This includes:

- Communicating with you and maintaining our relationship.
- Verifying qualifications and employment eligibility.
- Administering pay, benefits, and insurance.

- Processing work-related claims (e.g., workers' compensation).
- Supporting training, development, and performance management.
- Evaluating job or task qualifications.
- Investigating disciplinary matters or termination.
- Establishing emergency contacts.
- Complying with labor and employment laws.
- Creating internal directories.
- Protecting company-held information.
- Any other employment-related purpose reasonably required by Zasio.

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

Monitoring

All employee work product—whether in physical records, digital files, or other formats—belongs to Zasio. This work product, along with the tools used to create it, is subject to review and monitoring by Zasio at any time.

When Do We Disclose Your Personal Information?

Zasio may share your Personal Information with employees, contractors, consultants, and others who need it to manage your employment or administer benefits. We may also share limited Personal Information—such as business contact details—with service providers, customers, and prospects when necessary for marketing, delivering our products and services, or supporting business operations.

When sharing Personal Information, we generally require recipients to use it only for the intended purpose.

Additionally, we may disclose your Personal Information:

- As permitted or required by law or regulation.
- To comply with legal processes (e.g., subpoenas, court orders).
- To protect Zasio's rights, property, or services.
- In emergencies or to protect your safety or the safety of others.
- With your consent, where legally required.

We do not sell your Personal Information. We also do not use it for materially different, unrelated, or incompatible purposes without providing notice.

How Your Personal Information Is Protected

Zasio uses organizational, technical, and physical safeguards to protect Personal Information from accidental or unlawful destruction, loss, alteration, unauthorized access, or disclosure. Access is limited to personnel with a legitimate need to know.

These measures are designed to prevent unauthorized use, copying, modification, or disclosure of your Personal Information.

While we take reasonable precautions, no method of transmission or storage is completely secure. If a breach occurs, Zasio will notify you in accordance with applicable laws.

How Long is Your Personal Information Retained?

Zasio retains Personal Information only as long as necessary for the purpose it was collected, or for other compatible purposes such as legal compliance, asserting legal rights, or defending against claims.

Retention periods are documented in Zasio's records retention schedule, which is available to employees through the company's Versatile Retention Schedule Management software.

Business Transfers

Zasio may transfer your Personal Information to a third party in the event of a merger, acquisition, bankruptcy, or other transaction where control of our business changes. If this occurs, we will make reasonable efforts to notify you before your information becomes subject to different privacy or security practices.

Access to Your Personal Information and Deletion of Your Personal Information

Zasio is committed to complying with all applicable data protection laws. Where legally required, we will honor your rights to access or delete your Personal Information.

Updates

Zasio regularly reviews and updates its policies, including this one. To stay informed about our privacy practices, please review this policy periodically via Zasio's website or intranet.

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
v.Oct 2025	October 8, 2025	Interim Update	Legal Counsel and VP of Human Resources	Cindy Zasio, VP of Operations and Human Resources