

EU People Operations Data Privacy

INTRODUCTION

This Human Resources Data Privacy Policy (“this Policy”) describes a baseline set of common principles governing the handling of Human Resources Personal Data at Verifi, Inc., a California corporation and Verifi UK Limited, a United Kingdom private limited company and wholly owned subsidiary of Verifi, Inc. (collectively “Verifi”).

1. WHAT THIS POLICY COVERS

This Policy applies to all Personal Data about past, present and prospective employees, including candidates applying for a role, temporary and permanent employees, contractors, consultants and trainees (“you”) that is collected, maintained or used by directors, officers, managers and employees of Verifi and as part of an actual or prospective employment relationship.

Personal Data collected, maintained or used outside of the employment relationship, such as Personal Data arising from your use of our product(s) or service(s), is not covered by this Policy.

Nothing in this Policy is intended to form a contract of employment or otherwise.

At our discretion and as necessary, we may amend this Policy from time to time. We will notify you when updates are made by displaying a large print change notice on the top of this Policy.

2. OUR APPROACH

We value our employees and appreciate the importance of treating Personal Data as confidential.

In this Policy we outline our standards for Human Resources Personal Data privacy practices so that you have an opportunity to understand our approach.

We require any directors, officers, managers and employees entrusted with your Personal Data as part of their job responsibility to treat it as confidential and in conformity with this Policy.

We will also seek to ensure that any third-party service providers we use to administer our Human Resources programs, as described in Section 6 below, are bound to maintain confidentiality when handling your Personal Data on our behalf, in a manner that is consistent with this Policy.

October 22, 2018



3. PERSONAL DATA CATEGORIES

We generally process the following Personal Data about you over the course of recruitment or employment:

- Your biographical information, including your name, gender, date of birth, details of family members, previous job history, education details, nationality;
- Your contact information, including your home and postal address, telephone number, email address, country of residence;
- Your identification numbers, including government-issued identification number or passport information;
- Results of pre-employment screening checks (e.g. credit history, criminal records check where permitted under local law);
- Your performance information, including management metrics, appraisals, feedback;
- Communications and internet information like your correspondence and details of internet use held on or made through Verifi systems subject to relevant restrictions under applicable law; and
- Payroll and benefits information, including your salary details and bank account information.

We most often collect Personal Data about you directly from you in the course of your application and employment. We may also use other sources, subject to restrictions under applicable law, to assist in obtaining relevant Personal Data about you. For example, when a referee provides information about you; from other sources where you have made your Personal Information publicly available for the purposes of recruitment on jobs boards (LinkedIn or other publicly available social media networks and databases); third parties whom help to support recruitment, credit checks, reference and background checks.

Our Human Resources programs require Personal Data about you to function properly. In limited circumstances some programs may involve certain special categories of information such as your gender, marital status, race/ethnic origin, disability, physical/mental health, or any criminal proceedings with which you have been involved. Such Personal Data will only be obtained with your consent or as required by law.

We will endeavor to collect only the minimum amount of Personal Data required to administer our programs and to comply with applicable employment and other relevant laws.

4. LAWFULNESS

Generally, Verifi processes your Personal Data because it is necessary to do so to implement an employment agreement between you and the company, and where our legal duties as an employer require it. In other circumstances, we may process your Personal Data where it is necessary for us to defend, prosecute or make a claim in a court of law.

We may also process Personal Data for something called “legitimate interests” under European law. In practice, this means that we process your Personal Data for business purposes as described in Section 5 below.

Finally, we may seek your explicit consent for an activity from time to time, which you may decline if we ask, or revoke even after you have previously agreed, by contacting your People Operations representative.

5. HOW WE USE THIS DATA

Your Personal Data may be used for the following employment-related purposes:

- To contact you and manage our relationship with you, oversee compliance with policies and applicable law, assess performance, for promotions and appraisals and for training purposes;
- To store emails and documents generated by you on systems that we administer and make available for employment-related purposes, which may contain personal data;
- To manage your benefits, including administering compensation, relocation, insurance, payroll, pensions and other employee benefits and tax, including disclosure to third-parties such as payroll providers, accountants, occupational health providers, insurers, pensions administrators, hosting service providers and legal advisers;
- To manage recruitment of employees, including legal eligibility for work, vetting, hires, promotion and succession planning;
- To comply with policies, including in relation to claims, disciplinary actions or legal requirements and conducting investigations and incident response, including reviewing your communications in these situations in accordance with relevant internal policies and applicable law;

- For security purposes, for providing IT support and for employee authentication;
- To manage occupational health and absence and fitness for work and notifying family members in emergencies;
- To comply with our legal obligations and to change our business structure we may disclose your Personal Data in connection with proceedings or investigations anywhere in the world to third parties, such as public authorities, law enforcement agencies, regulators and third-party litigants;
- We may also provide relevant parts of your Personal Data to any potential acquirer of or investor in any part of Verifi's business for the purpose of that acquisition or investment;
- To facilitate business travel, travel-related support including conference attendance, bookings, and emergency support services;
- To conduct certain checks, such as criminal proceedings check or credit check where this is relevant to your position and in accordance with applicable law;
- To monitor equal employment opportunities, in respect of diversity categories including but not limited to age, gender, ethnicity, nationality, religion, disability, and marital or family status. Such monitoring would only apply where it is either required or authorized by the specific country's legislation, and conducted in full compliance with data protection requirements governing the use of such categories of personal data;
- For internal and external auditing, assurance and risk management purposes; and
- For statistical analysis and research purposes in the context of employment, including people planning.

6. INFORMATION SHARING & TRANSFER

Your Personal Data will be shared within Verifi for the purposes described in Section 5 above to the extent necessary to carry out these purposes, and as permitted by local and territorial laws.

We are a global company with a global footprint. Note that your Personal Data may be processed either locally in the jurisdiction where you work or reside, or in any other jurisdiction where we or our approved third-party service providers operate, worldwide, depending on the needs of the business over the course of your tenure with us, to the extent necessary and as permitted by law.

Please know that should your Personal Data move outside the European Economic Area we use GDPR-compliant mechanisms to require that the same level of data protection be applied in the jurisdiction where the data is being processed.

Your Personal Data will only be shared outside of Verifi with third parties under the following circumstances: (1) where a third-party service provider retained by us is under contract to assist in administering our Human Resources activities, subject to appropriate confidentiality obligations and data processing agreements, compatible with this Policy; (2) in the event that the company, business or division in which you are employed is being considered for outsourcing or sale, and then only subject to contractual requirements to preserve confidentiality; (3) with private or government authorities only when we have determined that we are required to do so under applicable laws; (4) to investigate suspected fraud or illegality, to anticipate or defend legal claims; or to conclude a change of control of Verifi; (5) where you have given us your prior permission to do so; or (6) with internal staff as necessary for the performance of their job duties.



7. WHAT ARE YOUR DATA SUBJECT RIGHTS?

- **SUBJECT ACCESS:** You have the right to access and obtain a copy of your Personal Data or ask that it be transferred to a third party which you have authorized;
- **RECTIFICATION:** You can ask us to have inaccurate Personal Data amended;
- **ERASURE:** You can ask us to erase Personal Data in certain circumstances, recognizing that Verifi must in any case respect its data retention legal obligations in the field of employment;
- **WITHDRAWAL OF CONSENT:** You can withdraw any consents to processing that you have given us and prevent further processing if there is no other legitimate ground upon which Verifi can process your Personal Data;
- **RESTRICTION:** You can require certain Personal Data to be marked as restricted for processing in certain circumstances;
- **RAISE A COMPLAINT:** You can raise a complaint about our processing with the data protection regulator in your jurisdiction.

8. DATA SECURITY

Maintaining the security and integrity of your Personal Data is a high priority and we endeavor to maintain appropriate administrative, technical, personnel and physical measures to safeguard Personal Data against loss, theft, and unauthorized uses or modifications.

We expect employees to contribute to the security culture of Verifi by following appropriate security policies and procedures, completing assigned trainings, and reporting suspected incidents to relevant incident response contacts promptly.

9. DATA RETENTION

We keep records of your Personal Data no longer than necessary for the purpose for which we obtained them and for any other permitted compatible purposes, including compliance with legal obligations in the field of employment law.

10. CONTACTS

If you have questions about this Policy, please send an email to our People Operations Team at:

humanresources@verifi.com

or write to us to:

Verifi Re: Privacy Policy

8391 Beverly Blvd., #310, Los Angeles, CA 90048

If there are any updates or changes in your Personal Data, please notify us by contacting your People Operations representative so that we can maintain its accuracy.