

PERSONNEL PRIVACY POLICY

Spencer Stuart is committed to protecting the privacy of your personal data. This statement summarizes our policy regarding the collection, use and transfer of your personal data, the security measures Spencer Stuart employs to protect such data, and your rights in relation to our processing of your personal data.

Purpose and Scope

Spencer Stuart may collect, use, and transfer your personal data within the context of our employment relationship in order to select and manage our workforce, run our business, and ensure the safety and protection of our workers and resources.

This Personnel Privacy Policy explains how Spencer Stuart, its subsidiaries, and affiliated companies handle the personal information of employees, directors, applicants, interns, former employees, dependents, beneficiaries, contractors, consultants and temporary agency workers (collectively, "Personnel").

We may amend this Policy with notice from time to time, should it become necessary to do so. This Policy may also be supplemented by other policies as needed to comply with local requirements in the country where you live.

The Information We Collect

Personal information may be obtained directly from you (e.g. during interviews, on-boarding and employment), through publicly available sources and/or third parties (e.g. sources/referees and authorized background check providers).

The personal information we collect may include (but is not limited to):

- Contact information (name, e-mail address, home address, telephone number);
- Identification data (civil/marital status, gender, nationality, date of birth);
- Government-issued identification numbers, such as national ID or social security number, for payroll purposes;
- Applications, transcripts, cover letters, interview notes, and resumes;
- Career and education history;
- Language skills;
- Immigration, right-to-work and residence status;
- References;
- Job-related information, such as years of service, work location, employment ID, work record, vacation, absences, and contracts;
- Individual capabilities and preferences;
- Professional views and opinions;
- Recruitment and performance-related data, such as objectives, ratings, comments, feedback results, work equipment, career and succession planning, skills and competencies, appraisals, performance reviews, performance improvement plans and related correspondence, and other work-related qualifications;
- Information related to your usage of Spencer Stuart's property;
- Photographs, audio and/or video recordings, such as those related to corporate events, training, security footage;
- Information needed for compliance and risk management, such as disciplinary records, background check reports, and security data;
- Payroll and payment or benefits-related information, such as salary, bonus, pension, allowances, expense reports, reimbursement records, insurance information, dependents, government identifier or

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tax numbers, tax related information, bank account details, and employment related health and welfare benefits information;

- Information required to arrange and secure travel arrangements and travel related expenses, such as your Known Traveler Number, frequent flyer account numbers, credit card number, and/or passport number;
- Beneficiary and emergency contact details;
- Information related to Spencer Stuart's Employee Share Ownership Program;
- Equal opportunities monitoring and sensitive information where required by law, such as racial or ethnic origin, membership of political parties or trade unions, and general health status such as medical statements.

Information collected through use of company property

Personal information may be collected through your use of Spencer Stuart's corporate property such as laptops, phones, and tablets as well as through personal devices used for company purposes (such as mobile devices). Additionally, we may monitor activities such as communications with clients or candidates, as well as your access, use, and disclosure of client, candidate, employee, and company information. We may use a number of manual and automated systems/processes to monitor these activities in the event of suspected inappropriate activities or on a periodic basis in order to ensure ongoing compliance with Spencer Stuart's policies.

The information collected may include (but is not limited to):

- Email - Messages sent within the company as well as those sent to or received from another person or company are backed up and recoverable for 1 year. Deleting mail from your system does not make it untraceable;
- Skype for Business conversations;
- Internet browsing history - All web browsing is logged;
- Device or network activity such as downloads, deletions, file transfers;

Access to any of the above will be restricted to situations where there are reasonable grounds to believe that applicable policies have been contravened and will be subject to approval by the legal department or management.

- Device Location (unless user opts-out during the software installation);
- Outlook information such as notes and calendar markings;
- Information stored in Spencer Stuart's cloud storage services;
- Company telephone records – received and placed calls with timestamp;
- Video conferencing records – received and placed calls, timestamp, and duration;
- Submissions of Personnel data into the internal HR platform (HR profile, absence and holidays, etc.);
- Device log on and log off – user, time, and location (i.e. IP address);
- Quest activity such as browsing history, downloads, searches, edits, reports, lists, comments, etc.

In addition, we may process sensitive personal information if it is needed for legitimate business purposes or if it is required to comply with applicable law. Sensitive personal information will not be collected, processed, or transferred, except where adequate privacy protection mechanisms are in place.

For further information on the use of company property see Spencer Stuart's Red Book.

Purposes for Collecting Personal Information

We process your personal information for the following purposes: workforce planning, recruitment and staffing; workforce administration, payroll, compensation and benefit programs; performance management, learning and

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development; advancement and succession planning; legal compliance, including compliance with government authority requests for information, garnishments and tax compliance; workplace management, such as travel and expense programs and internal health and safety programs, internal reporting and audit; maintaining and monitoring usage of internal networks and IT systems; business offerings and client relationships; work or travel visas; and other legal and customary business-related purposes.

How Will We Use Personal Information Collected?

We will collect, use and transfer your personal information as described in this Policy.

We may process your personal information for legitimate business purposes, to administer our employment or contractual relationship with you, to facilitate the administration of our business, and as may be necessary to comply with our legal obligations.

We have established routine processing functions (such as processing for regular payroll and benefits administration) and may also process personal information on an occasional or ad hoc basis (such as when an employee is being considered for a particular new position or personal contact details change). Additionally, some of your personal data (such as professional experience and company photograph) may appear on our website, client materials, or other promotional material for which it may be suitable.

We will not process your personal information in a way that is incompatible with this Policy or applicable legislation, and will take reasonable steps to ensure that personal information is accurate, complete, up to date and only processed by relevant individuals as described herein. Please note that you have a shared responsibility with regards to maintaining the accuracy of your personal information.

In the event of your suspension or termination, Spencer Stuart may request that you return any corporate property containing personal data that has been made available to you in the context of your employment as well as any physical or electronic copies.

Where is the Personal Data Held?

Personnel personal information is held within Spencer Stuart's relevant departments and systems, including Spencer Stuart's proprietary database, intranet, online applicant tracking system, local HR files and global HR platform. Additionally, data will be stored in the payroll management system, IT systems (including email and cloud servers) and, if applicable, on our website.

Transfer of Personal Information

Transfer to other Spencer Stuart offices

We may transfer information about you within the Spencer Stuart group for purposes related to your employment or those described in this Policy.

Transfer to third parties

Your personal information may be shared with third parties for legitimate purposes (e.g. third party service providers who perform functions on our behalf such as outsourced cloud storage providers) or where required to meet a legitimate need of Spencer Stuart as an employer (e.g. in the context of education verification, background checks or payroll administration).

All personal information transferred to third party service providers will be done in accordance with local legislation, applicable data protection laws, confidentiality provisions, and this Policy.

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Finally, your information may also be shared with relevant third parties in an emergency where your health or the security of our Personnel is endangered, with any competent law enforcement, regulatory or governmental body, or a court of law, if necessary to exercise/defend our legal rights, protect your interests, if we are required to do so or as a matter of applicable law or internal policy.

Transfer outside of the European Economic Area (“EEA”)

Your personal information may be transferred outside of the country where you work, including to countries that do not provide the same level of protection for your personal information (e.g. to third-party providers and Spencer Stuart offices operating in regions outside of the EEA). However, we are committed to protecting the privacy and confidentiality of your personal information when it is transferred. Where such transfers occur, we will assure that adequate protection exists either through appropriate contractual arrangements or as required by law.

Information Security and Integrity

To prevent unauthorized access to your data, maintain accuracy and ensure proper use of such data, Spencer Stuart has implemented appropriate legal, physical, technical and security procedures to safeguard and protect the confidentiality of the personal information collected, and prevent against accidental loss, unauthorized access, or unlawful processing. These measures will be reviewed over time and upgraded to remain up to date with legal and technological developments.

Retention of Personal Information

Spencer Stuart will retain your personal data only for as long as the data is needed in connection with the purposes for which it is being collected and used. We will use the following criteria as a guide for retaining your information:

- We will retain personal data for as long as we maintain an active relationship with you (e.g. while you are working for us);
- Both during our relationship and once our relationship has ended, retention of certain data may be necessary to exercise or defend our legal rights, and to fulfill, and/or demonstrate compliance with, any obligations associated with our working relationship.

Your Rights

You have the right to access, erase, correct, update or complete your personal data. Additionally, you have the right to request the transfer of your personal data to a third party, to object to the processing of your personal information or to ask us to restrict processing of your personal information. If you wish to exercise any of these rights you may contact privacy@spencerstuart.com.

Finally, you have the right to bring a complaint to the relevant data protection authority in your jurisdiction about our collection and use of your personal information. For more information on how to lodge a complaint, please contact your local data protection authority.

Material Changes to the Privacy Policy

Spencer Stuart reserves the right to modify or amend this Policy at any time and for any reason. If there are material changes to the Policy, we will take appropriate measures to keep you informed.

Contact

If you have any questions and/or requests regarding this Policy, please e-mail privacy@spencerstuart.com.