

Pantheon Systems, Inc. ("Pantheon") Employee and Applicant Privacy Policy

Last Updated April 25, 2022

This Employee and Applicant Privacy Policy ("Privacy Policy") addresses how Pantheon Systems, Inc. ("we," "our," "Pantheon") handles Personal Information (as defined below) we gather from employees, independent contractors and applicants for a job or contract role at Pantheon. Questions regarding this statement should be emailed to our Privacy Counsel at privacy@pantheon.io. This Privacy Policy describes the ways we collect, use and share employee, independent contractor and applicant information.

Pantheon is the data controller or "business", as defined under the EU General Data Protection Regulation (EU) 2016/679 ("GDPR") and California Consumer Privacy Act of 2018 ("CCPA"), respectively, dictating the processing of your personal data/person information by various service providers, such as service providers who provide benefits to you if you are an employee.

In this policy, "Personal Information" means any information that relates to you and either identifies you directly or could be used to identify you with other information available. It includes your name, email address, phone number, mailing address and payroll information. It does not include data where the information that identifies you has been removed, such as pseudonymised or anonymous data.

When applying to Pantheon and/or agreeing to work for or be employed by Pantheon, or otherwise providing us with your Personal Information, you are hereby consenting to Pantheon's collection, use, and disclosure of your personal information in accordance with this Privacy Policy.

Personal Information Gathered

We collect the following Personal Information from an applicant for a job at Pantheon ("applicant"), employees and independent contractors:

- **Cookies**: We collect certain information automatically from website visitors using cookies and similar technologies, including information from third parties. For more information, see our Cookie Policy at <https://pantheon.io/pantheon-cookies>.
- **Communications**: We collect, store, and process information that you provide to us when you communicate with us.
- **Application Information (Applicants/Employees/Independent Contractors)**: We collect, store, and process information that you provide to us when you apply for a job or contract role with Pantheon. Such information may include name, address, email address, telephone number and other contact information, resume or CV, cover letter, previous and/or relevant work experience or other experiences, education, transcript, or other information that you may provide to us in support of an application and/or recruitment process. We may also obtain information from interviews and phone-screening. We may also collect details about the type of employment you may be looking for, current and/or desired salary and other terms related to compensation and benefits packages, willingness to relocate, or other job preferences; details of how you heard about the job opening; any sensitive and/or demographic information obtained during the application or recruitment process such as gender, age, information about citizenship and/or nationality, medical or health information and/or your racial or ethnic origin; reference information and/or information received from background checks, where applicable, including information provided by third-parties; and information related to any assessment you may take as part of the interview screening process. This information is retained while you are an employee or independent contractor of Pantheon and deleted subject to our data retention policies and applicable laws. For applicants that are not hired, this information is deleted subject to data retention policies and applicable laws.

- **Payment and Tax Information (Employees/Independent Contractors)**: We collect, store and process information necessary to enable us to provide your compensation or pay an invoice, including your name, address, government identification number, salary information, and bank account details. If you are an employee, we also collect, store and process information regarding your tax and 401(k) plan elections, if applicable.
- **Benefits (Employees)**: We collect, store and process information necessary for us to provide you with offered benefits, including various insurance programs and other benefits, and may also collect, store, and process the following information for any family member or beneficiary listed on your benefits, including benefit selections, medical information, marital status (and, incidentally, sexual orientation), beneficiaries, other covered parties and their age, gender and relationship to you.
- **Employment Administration Information (Employees)**: We also collect, store and process other information as necessary in order to establish, manage and terminate your employment with us. This information may include, without limitation: (i) information concerning your job performance and reviews, (ii) compensation history within Pantheon, (iii) job titles and promotions, (iv) dates of employment, (v) training records, (vi) leave entitlements, (vii) disability-related accommodation requests, (viii) updated contact information, (ix) use of Pantheon IT systems, (x) employee identification number, (xi) photographs, (xii) signatures, (xiii) video images, or (xiv) other information which you provide or produce in the course of employment.
- **Monitoring Information (Employees/Independent Contractors)**. Pantheon may monitor its physical assets, electronic networks and employee communications for operational and security reasons, as well as to assess compliance with its policies and for other purposes as outlined below. We may collect Personal Information in the course of this monitoring practice.
- **Asset Management**
- **Reasonably suspected use of company software and/or assets in violation of the Global Code of Conduct**
- **Reasonably suspected violation of company Privacy, Confidentiality and similar policies**

Reasonably suspected violation of Confidentiality and Invention Assignment Agreement

Much of the Personal Information that Pantheon processes about you will have been collected from you directly, either during the recruitment process or shortly after you started work. Other Personal Information, such as performance appraisals, employee monitoring information, and compensation information is generated by you and/or management while you are working at Pantheon. However, Pantheon sometimes also receives Personal Information from third parties, for example, from your application references, an employment agency if you are an agency worker, or your physician if you are ill or injured and require a leave of absence or an accommodation.

Pantheon may request Personal Information about third parties from you, such as the details of whom we should contact in case of an emergency. Before you provide Personal Information about someone else, you must ensure that you have obtained the consent of the individual concerned.

Personal Information Use

Recruitment. Pantheon stores and processes Personal Information provided by job applicants for the purposes of carrying out application and recruitment processes. Pantheon uses applicant information to assess skills and qualifications against the applicable job opportunity; verify information and conduct reference checks; and comply with applicable laws, regulations, legal processes, or enforceable governmental requests.

Employment: Pantheon stores and processes Personal Information provided by employees for the purposes of carrying out the employment relationship, including the provision of benefits and compensation, onboarding, workflow management, talent management and succession planning, monitoring and enforcing compliance with Pantheon policies and procedures, safety and security monitoring, performing internal or external audits, investigating and enforcing disciplinary measures, addressing legal

disputes, and other purposes related to establishing, managing or terminating your employment relationship with Pantheon. We may also ask for consent for special conditions pertaining to Work from Home or other Remote Work arrangements.

Independent Contractor: Pantheon stores and processes Personal Information provided by independent contractors for the purposes of carrying out the contractual obligations between Pantheon and the individual, including the provision of compensation and ensuring that the terms of the contract are met.

Travel and Expenses: Pantheon collects, stores and processes Personal Information for the purposes of administering corporate travel and processing expense reimbursement;

Emergencies: Pantheon collects, stores and processes Personal Information in order to contact employees and/or emergency contacts in the event of an emergency.

Potential acquirers of Pantheon's business: If Pantheon is involved in a merger, acquisition or asset sale (each a "transaction"), some or all of Pantheon personnel's Personal Information may be disclosed for the purposes of evaluating or carrying out the transaction. In such a case, the other party will be instructed to handle the Personal Information in the same manner as provided in this Privacy Policy, and personnel will be notified to the extent required by applicable laws.

Other: as otherwise required or permitted by applicable law. For instance, we may conduct credit checks on those applicant, employees and independent contractors who have access to Pantheon's funds and as otherwise reasonably required by Pantheon customers.

Sharing of Personal Information

Pantheon will not copy, distribute, or otherwise share any applicant, employee or independent contractor Personal Information except as set out in this Privacy Policy. Pantheon may share applicant, employee or independent contractor Personal Information in the following ways:

- **Service providers:** From time to time, we may disclose your Personal Information to organizations that perform services for Pantheon, such as processing job applications, conducting background checks, providing benefits, enabling payment and/or reimbursement, providing consulting services regarding business operations, conducting investigative or providing legal services, and similar services. We will share with these companies only the Personal Information they need to provide the services.
- **Potential acquirers of Pantheon's business:** If the stock or assets of Pantheon, its subsidiaries, its joint ventures or any combination of such are acquired by another entity, some or all of the Personal Information of applicants, employees and independent contractors may be provided to such a successor. In such a case, the successor will be instructed to handle the Personal Information in the same manner as provided in this Privacy Policy.
- **Subsidiaries and affiliates:** Personal Information, such as your name, title, phone number, and Pantheon email address, may be shared with employees at Pantheon's subsidiaries and affiliates in furtherance of business objectives such as working with clients or on projects involving other members of the Pantheon Group, to provide support and answer questions you may have, and for similar business purposes.
- **Consent:** We may disclose your Personal Information to third parties where we have your consent to do so.
- **Where otherwise required or permitted by law:** We may disclose your Personal Information as otherwise required or permitted by applicable law. For example, we may be required in certain circumstances to disclose Personal Information in response to a lawful request by public authorities, the courts, law enforcement, or to comply with national security requirements. To the extent allowed by law, we will notify you before or in conjunction with a required disclosure.

If you live in Canada, your Personal Information may be transferred to, and processed in, countries outside of your jurisdiction, including the United States. Accordingly, your Personal Information may be accessible to courts, law enforcement and national security authorities of those countries. If you have any questions, or wish to obtain further written information about Pantheon's policies and

practices with respect to the collection, use, disclosure or storage of your Personal Information by service providers or affiliates outside of Canada, you may contact our Privacy Counsel at privacy@pantheon.io.

Security and Access

If you live in Canada, your Personal Information will be held on our servers in Québec, Canada. Employee Personal Information is accessible to employees on a “need to know” basis, which may include managers, People Team, Finance, Legal, audit, IT and InfoSec staff.

Pantheon uses appropriate administrative, technical, organizational, and physical security measures to protect applicants’, employees’ and contractors’ Personal Information against accidental or unlawful destruction, loss, and alteration, and against unauthorized disclosure and access. We use standard industry practices to protect Personal Information, including firewalls, SSL encryption, system redundancies, and co-location at a 24/7 secured, controlled environment.

Accessing and Updating Contact Information

We encourage our applicants, employees, and independent contractors to access, update and edit their contact information to keep the information current. Employees can access, correct or update their contact information by communicating with the People Team at peopleteam@pantheon.io or using self-serve mechanisms within the tools supplied to employees.

Your Data Protection Rights

You can exercise any one of the following data protection rights as may be available to you under applicable law by contacting us at privacy@pantheon.io. We will acknowledge and respond to your data protection rights requests promptly and in all cases no later than within 30 days unless required sooner under applicable law. You have the following data protection rights:

- Depending on your jurisdiction, you may have the right to **access, correct, update, request deletion, or request a portable copy** of the Personal Information we collect about you. Please note that Pantheon may have a legal right or other obligation to maintain certain information about you, irrespective of your request for deletion.
- If you have any questions, or wish to obtain further written information about Pantheon’s policies and practices with respect to the collection, use, disclosure or storage of your Personal Information by service providers or affiliates outside of Canada, you may contact our Privacy Counsel at privacy@pantheon.io.
- Please refer to Data Privacy Regulations in your particular geographic location for specific rights that may be provided in addition to the general description above.

Receive Notice of Changes

Pantheon reserves the right to change this Privacy Policy from time to time as necessary to reflect changing legal, regulatory or operational requirements. Pantheon will provide notification of the material changes to this Privacy Policy through its website and announcements made to employees during regular Weekly Kick Off meetings and/or by email.

Data Retention

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so as part of your application, employment or engagement with us and to comply with applicable legal, contractual, tax and accounting requirements. When this information is no longer necessary for our purposes, we delete it according to our retention schedules and applicable laws.

Contact

In order to exercise your data protection rights or should you have any questions, concerns or complaint regarding our Privacy Policy or the processing of your personal information, you may communicate with the People Team at peopleteam@pantheon.io, use the self-serve mechanisms within the tools supplied to employees or you may email our Privacy Counsel at privacy@pantheon.io.