

CSC GENERATION HOLDINGS, INC.

DATA PROCESSING NOTICE

This notice (“Notice”) will provide you with information on our data processing activities with respect to certain personal information about employees and job applicants of CSC Generation Holdings, Inc. and its subsidiaries, affiliates, and acquired entities (the “Company” or “we”) in the United States, Canada, and Mexico.

Table of Contents

I.	How We Process Your Personal Information
II.	Why We Process Your Personal Information
III.	Recipients of Your Personal Information
IV.	International Transfers of Personal Information
V.	How Long Will Your Personal Information Be Retained?
Annex	Classes of Personal Information

I. HOW WE PROCESS YOUR PERSONAL INFORMATION

We will process certain individually identifiable information about you prior to you applying to be a Company employee, during and after the course of any job application process (whether or not you are hired), and during and after your time as a Company employee. We collect this information (“Personal Information”) before and during your job application process, at the start of your employment, and in the course of your employment, for the purposes stated in Section II of this Notice. Such information may be collected directly from you or collected from other sources, such as information from our partners who assist with recruitment and human resources services, and publicly-available sources (e.g., LinkedIn and similar sources of publicly-available information about you).

The information we collect includes information about how to contact you, your role and compensation as a Company employee, who to contact in an emergency and your banking details. Some of the Personal Information we collect is “sensitive” information, such as information about your nationality, birth country, marital status, and health.

Please refer to the Annex to this Notice for full details of the information we collect about you. The list in the Annex is divided into different classes of Personal Information as we do not collect, use, and process all Personal Information for the same purposes.

Certain categories of Personal Information which we collect are necessary for us to fulfill our contractual obligations to you (for example, identification information and bank account information for us to pay your salary, and certain information may be necessary to process your job application). If you do not provide this Personal Information, we may not be able to fulfill certain obligations under your employment relationship with the Company.

II. WHY WE PROCESS YOUR PERSONAL INFORMATION

Your Personal Information may be processed where the Company reasonably considers it necessary for the purposes of complying with legal or regulatory obligations, investigating infringements of the law or Company policies (including disciplinary and grievance matters) and establishing, exercising or defending the Company’s legal rights. Your Personal Information will also be processed in the operation and management of the Company’s IT systems which systems may be hosted internally or externally.

We categorize Personal Information into Classes 1-4, defined in the Annex, although the Personal Information we collect may not be limited to those categories set out in the Annex. We process your Personal Information for the following purposes:

- Class 1 Information: To facilitate cooperation, communication, and teamwork within the Company, including its Canada and Mexico subsidiaries, affiliates, and acquired entities, and to provide for a directory;
- Class 2 Information: To plan and manage human resources, including but not limited to ensuring appropriate staffing and evaluating employees for their qualification for a particular job; cooperation, promotions, secondments, and transfers within the Company; cross-border team work; investment decisions; forecasting and budgeting; accounting, salaries, benefits, compensation and expenses; recruitment; administration of compensation and benefit programs, payroll management and/or processing, training, performance management, succession planning, for documenting proper conduct during the employment relationship and proper termination of employment relationships, and awards of equity or other types of rewards; providing data subjects with access to company computer systems and networks; other tangible and intangible benefits; obtaining feedback from our applicants and employees about our systems and their experience; and in cases of temporary or permanent assignments or secondments of individual employees (which will only occur at their request, with their voluntary consent or otherwise in compliance with applicable law) to such third parties in order to prepare and implement the transfer;
- Class 3 Information: To provide third party benefit plans administration services, and assist the Company in discharging essential functions regarding its equity compensation and benefit plans;
- Class 4 Information: The Company has in place secure systems where personal information, including employee payroll and benefits information, can be processed. We do not collect sensitive information unless this is legally required, or with consent, or as otherwise authorized under applicable law.

We process Class 1 Information to meet our legitimate interests in ensuring that our employees cooperate across locations, and to facilitate this communication.

As described above, we process Class 2 Information for certain purposes on the basis of your consent. We process Class 2 Information for the other purposes described above to meet our contractual obligations to you, for example, by providing the IT equipment required for you to carry out your role, and to meet our legitimate interests in ensuring that the business functions efficiently, by ensuring that appropriate staff are assigned to appropriate jobs, that our finances are kept in order across the Company, and that our records are kept up-to-date.

We process Class 3 Information to fulfill our contractual obligations to you when we contract with you to provide third party benefit plans. We also process Class 4 Information to carry out our contractual obligations to you, to ensure you are provided with the correct salary and benefits. We process sensitive categories of Personal Information, which are included in Class 4 Information, on the basis of your explicit consent.

Where we process information related to your health for the purposes described above (such as in relation to providing benefits services), we will do so on the basis that it is necessary to comply with our legal obligations in relation to employment law, or in cases where this is not strictly necessary, on the basis of your consent.

Where we process your Personal Information on the basis of your consent, you may withdraw this consent at any time.

III. RECIPIENTS OF YOUR PERSONAL INFORMATION

The following recipients or categories of recipients will receive access to some of your Personal Information.

A. HRIS

We will include certain Personal Information in a human resources information system (“HRIS”), which is a tool that assists the Company to administer human resources and employee compensation and permits employees to manage their own Personal Information in some cases. The Company may host such respective servers in the United States or may utilize third party servers but in either case will be responsible as controller

for security access within the databases for Personal Information in the HRIS. This transfer of Personal Information will enable the Company to benefit from improved human resources management and to centralize payroll and benefits administration, which will reduce costs and minimize data transfers by less secure means.

With the exception of Class 1 Information, which is available to everyone in the Company to facilitate cooperation, only human resources managers and authorized employees with a need to know have access to the other classes of Personal Information. For example, managers are authorized to have access to Personal Information of the employees which report to them. Certain executives, managers, and employees may also have access to certain Personal Information, however, on a “need-to-know” basis if there are legitimate business purposes, e.g., supervisor-reporting relationships across national borders. A list of such affiliates is available upon request.

B. Service Providers, Third Parties

In addition, we make certain Personal Information available to affiliated and unaffiliated service providers on a “need-to-know” basis and other third parties. By way of example, some Personal Information in the HRIS will be available to the Company’s employee benefit plans service providers (who will have access to certain Class 3 Information), third parties who provide payroll support services to the Company, and government agencies and entities, where required.

IV. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Some of the recipients of Personal Information discussed in Section III above will be located or may have relevant operations outside of your country. The Company has taken appropriate measures to ensure that Personal Information is treated in accordance with applicable data protection laws. In addition, the Company will provide an adequate level of protection for the Personal Information, and appropriate technical and organizational security measures will be in place to protect Personal Information against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

V. FOR HOW LONG IS PERSONAL INFORMATION RETAINED?

Information collected for the purposes stated in this Notice will be stored only as long as necessary during the term of your employment relationship with the Company (which also includes the relationship you have with the Company before and during the job application process), and may be stored during any necessary post-application or post-termination transition period. If a judicial or disciplinary action is initiated or anticipated, the relevant Personal Information may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived.

Your Personal Information will not be kept in a form that allows you to be identified for any longer than is reasonably considered necessary by the Company in light of the purposes for which it was collected and any applicable data retention periods. The Company will only retain your Personal Information for longer than these retention periods where it is required to do so by applicable law.

ANNEX

Classes of Personal Information

Class 1 Information: Generally available contact information, which may include:

- Name format type
- Prefix (Mr./Mrs/etc.)
- First name
- Preferred Name
- Middle name
- Last name (Family Name)
- Former Last Name (Maiden Name)
- Job code
- Reports to position number and name
- Office e-mail address
- Office phone number
- Company cellular phone number
- Employment Location
- Job title
- Employee ID

Class 2 Information: Qualified HR Data, which may include:

- National ID Type
- National ID
- Country (that has issued the National Identification document)
- Regulatory Region
- Nationality
- Date of Birth
- Gender
- Language Skills
- Passport Issue Country
- Passport Issue City
- Passport Issue State
- Passport Expiry Date
- Visa Status
- Country - for Visa/Permit (Country Name for which visa is applied/granted)
- Visa Effective Date
- Visa Type (Work Permit/Business/etc.)
- Visa Contract
- Visa Expiry Date
- Home Address
- Employment Location
- Employment Action (Hire/Rehire/Termination)
- Reason for Employment Action (Hire/Rehire/Termination/Leave)
- Notice date (when payroll end date is different from working end date)
- Temp agency (applicable for agency workers)
- Job Code
- Reports To Position Number and Name
- Employee Classification
- Employment Status
- Type of Contract
- Contractual starting date
- Contractual end date
- Probation Period

- Continuous Service Date
- Job classification
- Full time/ Part time status
- Part time percentage
- Job Title
- Department
- Sub-Department
- Region
- Market
- Project and Project allocation
- Cost Center and Cost Center allocation
- Supervisor (Employee Name and ID)
- Work Period (Weekly/Monthly/etc.)
- Salary Administration Plan
- Salary Grade
- Compensation Rate Code
- Compensation Rate
- Supplemental salary
- Overtime compensation
- Bonus compensation
- Other variable compensation
- Other leave compensation
- Not taken holidays compensation
- All company paid expenses, benefits and benefits in kind
- Housing Allowances
- Travel Allowances
- Car or Commuting Allowances
- Other Allowances (Cost of Living, Mobile Phone, etc.)
- Employee expenses
- Stock Administration Plan
- Education
- Company Training History
- Performance Rating History
- Marital Status
- Number of Dependents – Children
- Number of Dependents - Adults
- Reason for Employment Action (Hire/Rehire/Termination)
- Feedback provided to the Company
- Days of absence taken per year (but not including health related personal information)
- All personal information required to provide data subjects (1) access to company computer systems and networks and (2) tools to electronically communicate within the Company, including but not limited to IP address and user login name.
- CCTV recordings which may include images of employees
- Call recordings including employee voice recordings

Class 3 Information: Stock and Benefit Plans Administration Service Provider Data, which may include:

- Name format type
- Prefix (Mr./Mrs./etc.)
- First name
- Middle name
- Last name
- Country (that has issued the National Identification document)
- E-mail address
- Employee ID, other than Social Security Number for non-US employees

- Employment Action (Hire/Rehire/Termination) – Date of hire
- Employment Action (Hire/Rehire/Termination) – Termination date
- Tax jurisdiction
- Tax withholding rate
- Annual Salary
- Payroll entity responsible for reporting of income and taxes
- General Ledger code (including business unit and department information)
- Home address
- Date of Birth
- All details related to grants under the equity plans, including but not limited to grant date, number of shares granted, type of shares granted, vesting requirements and number of stock options exercised.

Class 4 Information: Locally Processed Data/Processing Services, which may include:

- Photographs - for identification purposes (*example:* company directory) or security purposes (*example:* identification badge)
- Dependent Details (Name, Date of Birth, Relationship)
- End of Service payment and accruals
- Holiday salary deduction
- Holiday compensation and accruals
- Other leave salary deduction
- Paycheck details include the following (where applicable):
 - a) Total Gross Salary
 - b) Employee's wage tax (withheld by the employer)
 - c) Employee's compulsory Social Security deduction
 - d) Employee's compulsory retirement deduction
 - e) Employee's compulsory unemployment deduction
 - f) Employee's additional medical care deduction
 - g) Other compulsory or additional employee's deductions
 - h) Employee's voluntary retirement deduction
 - i) Employee's voluntary medical care deduction
 - j) Other Employee's voluntary deductions
 - k) Total Employee Deductions
 - l) Total Net Salary
 - m) Stock purchase plan deduction
 - n) Expenses refund and advances
 - o) Expatriate expenses refund
 - p) Benefits in Kind deduction
 - q) Other Net adjustments
 - r) Salary Advance Adjustments
 - s) Third Party payments (net)
 - t) Total Net Adjustments
 - u) Net to Pay
- Banking Details, including the following:
 - a) IBAN (International Banking Account Number) or BBAN (Basic Bank Account Number)
 - b) BIC (Bank Identifier Code) or SWIFT code
 - c) Account currency
 - d) Name on the bank account
 - e) Bank name
 - f) Percentage or amount transfer to bank
- Third Party Payments (where acting as an employer surrogate when the employee is on leave for long-term sickness, accident at work or other reason.)