

## Employee Privacy Policy (EU)

Last updated November 6, 2019

Hi-Rez Studios, Inc. and its subsidiaries (collectively “**Hi-Rez**,” “**we**,” “**our**” or “**us**”) is committed to protecting the privacy and security of personal information about you which is processed by us in connection with your work for, employment or application for employment with Hi-Rez as explained and set forth in this Employee Privacy Policy (this “**Employee Privacy Policy**”). Please review this Employee Privacy Policy, its statements, terms and conditions carefully. If you have any questions regarding this Employee Privacy Policy, please contact Hi-Rez at [legal@hirezstudios.com](mailto:legal@hirezstudios.com).

### COLLECTION OF EMPLOYEE INFORMATION

If you submit an application for employment to Hi-Rez, or are currently an employee of (or otherwise work for) Hi-Rez, Hi-Rez will collect the information in any form it obtains through your application for employment or continued employment with Hi-Rez, and your submission of employee related documents, including but not limited to the personal information that you submit in connection with your employment or intended employment (collectively “**Employee Information**”). Examples of Employee Information collected in connection with your employment or application for employment include but are not limited to your name, date of birth, government issued identification (passport, social security number, driver’s license number), banking information, marital status, health information, benefit information, title, employment history, education, job qualifications, performance related indicators, and other relevant personal data. If you advance sufficiently in the job application process, we may collect information about your professional or academic references, and we may request that you participate in a criminal record check. We will also collect information about your spouse or dependents when you provide it to us when you enroll in health and other benefits or provide contact information.

Hi-Rez may use a multi-factor authentication system for access to its IT system. During your work for us, if you authenticate via phone call or text message (for clarity, without installing the MFA app) or a hardware token, then we will receive and process the times of issuance of authentication requests, times of access to the system, and the method of authentication (collectively, the “**Authentication Information**”). If you install our multi-factor authentication (“**MFA**”) app on your personal smartphone, then we may also receive and process information including your smartphone’s IP address, device data (including e.g., hardware model; operating system; security settings; device identifiers), and location data in addition to the Authentication Information (collectively, and including the Authentication Information, the “**Device Information**”). Unless expressly stated otherwise, references to Employee Information in this Employee Privacy Policy shall include Device Information.

If you work as an independent contractor, your employer is the agency that assigned you to Hi-Rez and not Hi-Rez. Hi-Rez may receive additional information from your agency (if you were assigned by an agency to Hi-Rez) or references you have provided.

Employee Information does not include any information that is available to the general public and excludes information generally available on a business card.

### USE OF EMPLOYEE INFORMATION

In accordance with applicable law, Hi-Rez may use Employee Information in order to evaluate applications for employment, manage work-related aspects of the employee-employer relationship (*i.e.*, training, payroll, benefits, travel, reimbursement expenses, succession planning, employee health and safety, attendance monitoring and performance appraisals and reviews), investigate and respond to any claims related to your employment, and comply with applicable laws and regulations.

Hi-Rez may use Device Information to monitor access to Hi-Rez’s IT System (the “**System**”), prevent unauthorized access to the System, and investigate any suspected security breaches.

### SHARING OF EMPLOYEE INFORMATION

Like many businesses, from time to time, Hi-Rez outsources the processing of certain human resources functions. Hi-Rez may share your Employee Information with selected service providers or consultants acting on its behalf, including (a) recruitment platform providers; (b) background check or other screening service providers; (c) employee database and records storage providers; (d) employee directory platforms; (e) third party benefits or payroll administrators; (f) employee feedback service providers; (g) employee training providers; (h) travel facilitators; (i) succession planning coordinators; and (j) health and safety providers. Hi-Rez may share your Device Information

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with law enforcement agencies and selected service providers including (x) security consultants; (y) IT service providers; and (z) software providers. Hi-Rez requires that those third party service providers protect your Employee Information in accordance with this Employee Privacy Policy. Hi-Rez is responsible for the processing of personal data it receives from citizens of the EU in accordance with applicable privacy laws in the EU. Hi-Rez gives citizens of the EU the opportunity to opt-out prior to disclosing Employee Information or using Employee Information for a purpose that is incompatible with the purpose for which it was originally collected or subsequently authorized by such individual.

Hi-Rez may disclose your Employee Information if required to do so by law, governmental or quasi-governmental requests, or a regulatory organization, or to relevant third parties such as technicians, brokers, auditors, lawyers, or professional advisors. In the event that Hi-Rez considers it necessary to disclose Employee Information to protect the health, safety, or well-being of our employees, we may share Employee Information to prevent such harm. As Hi-Rez continues to develop our business, we may buy or sell assets. In the unlikely event that Hi-Rez or substantially all of our assets are acquired, Employee Information may be one of the transferred assets.

### **STORAGE AND RETENTION OF EMPLOYEE INFORMATION**

Employee Information may be stored in hard copy or electronic format locally within the office of your employment as well as in the United States or other countries in which Hi-Rez, its affiliates, agents, or contractors operate in. Where required by applicable law, Hi-Rez implements appropriate safeguards in respect of any Employee Information that it transfers outside of the European Union. Hi-Rez may retain your Employee Information as long as necessary and appropriate to comply with applicable legal standards. Your Employee Information may be transferred into our human resources system and used to manage your employment, may become part of your personnel file, and may be used for other work-related purposes.

### **LEGAL BASIS FOR USE OF EMPLOYEE INFORMATION**

If you submit an application to work for Hi Rez, the legal basis on which we process your Employee Information is that it is necessary for our legitimate interest in assessing your application and your suitability for employment, or to provide services to us.

If you are employed by Hi-Rez, the legal basis on which we process your Employee Information is that it is necessary for our legitimate interest in pursuing our business, and in order to give effect to the contract of employment between you and us. If work for us as a contractor or in another “non-employee” role, the legal basis on which we process your Employee Information is that it is necessary for our legitimate interest in pursuing our business.

If you provide Hi-Rez with information about your spouse or dependents, the legal basis on which we process this information is that it is necessary for our legitimate interest in giving effect to any benefits that you enroll into, or to contact appropriate individuals in the event of an emergency.

If you install an MFA app on to your device in order to log-in to Hi-Rez’s IT system, or if you authenticate via phone call, text message or hardware token, the legal basis on which we process your Device Information is that it is necessary for our legitimate interest in seeking to ensure that access to the Hi-Rez IT system, and the information stored on it, is only available to authorized individuals.

### **RIGHTS IN CONNECTION WITH EMPLOYEE INFORMATION**

You may contact your human resources representative to request access to your Employee Information, to request that it is erased, that its processing is restricted, or that any inaccurate Employee Information is rectified. We will evaluate any request that we receive in accordance with applicable law.

### **CONTACT AND DISPUTE RESOLUTION**

If you have any questions regarding this Employee Privacy Policy or complaints regarding Hi-Rez compliance with this Employee Privacy Policy, you should first contact Hi-Rez at [legal@hirezstudios.com](mailto:legal@hirezstudios.com). We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your Employee Information in accordance with this Employee Privacy Policy. If you are a citizen of the European Union and you have an unresolved concern regarding your Employee Information that we have not addressed satisfactorily, you may also contact your local data protection authority. If Hi-Rez needs, or is required, to contact you concerning any event that involves Employee Information about you, we may do so by email, telephone, or mail.