



## 1. Scope of Notice

This Notice is intended for each employee (“you”) of The NPD Group, L.P. (“NPD”) or an entity controlled by NPD (the “Group”). The controller of your personal information is NPD, and in limited cases, your employer and NPD. This Notice sets out relevant information regarding the privacy and protections accorded to your personal information by or on behalf of NPD and relevant Group members. Additional details regarding privacy and protection may be found in the NPD Authorized Use Policy and the NPD Information Security Policy and such other policies as NPD may implement, which can be found at <https://npdinsider.npd.com/wps/myportal/npdintra/insider/it-ops/information-security/policies/>. When used in this notice, the term “personal information” means any information that directly or indirectly identifies an individual, such as a name, phone number or one or more factors specific to that individual’s physical, physiological, mental, economic, cultural or social identity.

## 2. Purposes of Processing Your Personal Information

Your personal information will be processed by NPD and relevant Group for various purposes to the extent required by or permissible under applicable law, including but not limited to:

- a. Management of NPD workforce, including: general management of employees; payroll; hiring; benefits and compensation; reviewing and evaluating employee performance; monitoring attendance; investigating suspected misconduct or non-performance of duties; head count analysis; senior staff succession planning; employee training, appraisal and promotion; employee travel; management forecasting; employee discipline and termination; negotiation with trade unions or other employee representatives;
- b. Management and development of the Group's business;
- c. Administration of NPD and Group policies and procedures;
- d. Compliance with an obligation imposed by local, national, federal or any other applicable law or regulation;
- e. Management of assets and facilities, including security thereof;
- f. Providing IT and information processing support and IT applications and systems maintenance;
- g. Monitoring IT systems to prevent any use contrary to Group policies and/or criminal or civil offenses;
- h. Monitoring and preventing sexual or other unlawful harassment, discrimination and/or criminal or civil offenses where warranted by a specific set of circumstances;
- i. Provision of Group services and other services (such as IT and communication systems);
- j. Analyzing, preparing or effecting any planned or contemplated structural change or reorganization implicating a Group company, function or department;
- k. Analyzing, preparing or effecting any planned or contemplated restructuring, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of any member of the Group;
- l. Protecting and defending any Group company's rights and interests (including in connection with any administrative, court, arbitral or mediation proceeding);
- m. Preserving or defending any Group company’s rights in court, responding to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities (including tax and employment);
- n. Communicating within the Group and with third parties in furtherance of the foregoing; and
- o. Managing, updating, storing, archiving and deleting personal information in support of the Group’s activities related to any of the foregoing purposes.

Your personal information will be processed by NPD by electronic means as well as by organized filing systems of hardcopy documents. The provision and the processing of your personal information as outlined above is mandatory. If personal information is not provided, or if you object to the processing of your personal information, it is likely that NPD will not be able to manage the employment relationship between you and your employer.

### **3. Types of Personal Information Processed**

NPD processes different types of your personal information, to the extent permitted under applicable laws:

- Contact information (such as your name, user name, address, email address and phone number);
- Date of hire or re-hire;
- Nationality;
- Place and date of birth;
- Driver's license number, social security number, social insurance number, national ID, tax number and other governmental identifiers;
- Gender;
- Marital status;
- Disability status;
- Military status;
- Psychometric and ability test results;
- Information relating to job positions (such as your employee ID, job title, company, department number, supervisor, business phone and business email, standard hours, performance ratings);
- Training courses;
- Emergency contact details;
- Payroll information, including salary, compensation, benefits information, including bank details and payroll frequency;
- Payment information;
- Pension arrangements, medical insurance arrangements, life assurance arrangements and details of beneficiaries, if any;
- Absences and leaves;
- Information relating to benefits, if any;
- Information relating to expenses, if any;
- Experience information (such as your resume information and summary of employment history and educational background, skills, records and appraisals, and statements of opinion or intention);
- Use of NPD assets and facilities;
- Employment documents, including but not limited to copies of employment contracts, IDs, birth certificate, educational degrees, medical checks, criminal checks;
- Date of and reason for cessation of employment and post-employment contact information (if applicable); and
- Logging and other records of communications within the Group and with third parties in furtherance of the purposes set forth in Section 2. above.

Your friend and family information (such as emergency contact and beneficiary details) will be processed by NPD solely if you provide it to your employer and in order for your employer to contact them when necessary. You are required to provide any such friends and family with a copy of this Notice and, where required, obtain their consent.

### **4. Processing Your Personal Information**

The Group is committed to ensuring that all employee personal information is:

- Processed fairly and lawfully;
- Processed for specific purposes only, and not in any manner incompatible with those purposes;
- Adequate and relevant;
- Kept accurate;
- Retained no longer than necessary;
- Processed consistent with your rights; and

- Kept secure.

Where required by applicable law or internal Group policies, your consent will be requested before processing your personal information. In the event any such consent is sought, you will also be provided with an option to opt-out of the consent so given, and you may withdraw your consent at any time.

## **5. Sharing Your Personal Information with Third Parties**

Where necessary in order for your employer to perform its obligations to you, or for you to perform your job function, or for the purposes described in this Notice, your employer will share your personal information with other Group entities, third party service providers who maintain reasonable security practices commensurate with applicable law, government agencies and/or other third parties, such as Group customers. In some cases, third party service providers may be granted access to a specific Group database, but their access is restricted on a need-to-know basis via access limitations. Group entities and third parties with whom your information will be shared include:

- The NPD Group, L.P.;
- your employer's bank and payroll processor;
- applicable tax, social security and employment authorities, and mandatory fund administrators;
- third party insurance and benefits providers (where applicable);
- NPD HR and IT personnel responsible for HR management or IT processing and security functions;
- third parties providing IT services and support for any of the purposes described in Section 2. above;
- financial consultants, professional advisers and in-house and outside counsel; and
- where permitted by law and required as a part of your job function, Group customers or vendors or other third parties where this is helpful to developing the business (for example, to compete for, or meet obligations under, an existing or possible business contract).

Wherever required under applicable law, the relevant Group company will enter into with third party service providers data processing or similar agreements that require in particular that such third party service providers will maintain the same level of personal information protection as implemented by the Group.

## **6. Transfers of Information Outside of Your Country**

Your personal information (as described in Section 3. above) may be transferred to other Group entities or to third parties described in Section 5. above, only to the extent necessary for your employer to perform its obligations to you, or for you to perform your job function, or for the purposes described in this Notice. In particular:

- Your professional profile and contact information contained in systems such as Outlook, SharePoint, and Workday, will be accessible to all employees of Group companies worldwide.
- Your personal information may be transferred to Group headquarters in the U.S. and/or to Group employees located inside or outside your country, and/or to a person or company that is not part of the Group located in or outside your country of residence.
- Transfers may be made to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities (including tax and employment). Such transfers may entail access by courts or governmental authorities outside your country.

## **7. Data Security**

Your personal information will be secured by taking security measures that are commensurate with the sensitivity of the personal information processed. To this end, the Group maintains reasonable physical,

technical, and administrative security measures (including IT system monitoring) with a view to protecting employee personal information against theft; accidental loss; unauthorized alteration; unauthorized or accidental access, processing, erasure, use, disclosure or copying; and/or accidental or unlawful destruction. The Group takes reasonable steps to confirm that third parties who are recipients of personal information have data security procedures in place that are commensurate with those of the Group.

#### **8. Updating Employee Information**

You have the responsibility to ensure that changes in your personal information are kept up to date. You have the right under applicable law to access and correct personal information concerning you, subject to limited exceptions that may be prescribed by applicable law. Where justified and allowed by applicable law, you may also require that your personal information be deleted or blocked, or you may be entitled to object to further processing of your information.

Your right of access, correction, deletion, blocking and objection, and your responsibility to notify changes in your personal circumstances, as well as any other right you may have under applicable law, may be exercised by signed request or email as follows:

- a. General requests may be made to your local HR department.
- b. You can update selected information about you by logging into Workday.

#### **9. Retaining Your Information**

We retain your personal information for a period no longer than required to fulfill the purposes for which it was collected, which may correspond to the applicable statute of limitations or a mandatory retention period under applicable law.

**I ACKNOWLEDGE THAT I HAVE READ AND UNDERSTOOD THIS NOTICE AND I AGREE TO COMPLY WITH THIS NOTICE AT ALL TIMES.**

*Issued: March 2022.*

*A copy of this notice is available in the "Reviewed Documents" section of Workday that NPD employees can access.*