

## Notice of Data Collection and Processing

This Notice of Data Collection and Processing (the "Notice") for Workwell North America (the "Company"), describes the Company's collection of Personal Data from candidates and Workers and the business purposes for which this data will be used. This Notice supplements our comprehensive Privacy Policy and is not intended to override it. This includes, but is not limited to any provisions in the Employee Handbook.

### Definitions

For purposes of this Notice:

- **"Data Controller"** means the entity that determines the purposes and means of processing Personal Data.
- **"Data Processor"** means the entity that processes Personal Data on behalf of the Data Controller.
- **"Data Subject"** means an identified or identifiable natural person to whom the Personal Data relates.
- **"Internal Employee"** means an individual who works, or is applying to work, for the Company in the capacity of a Company employee internally at the Company.
- **"Personal Data"** means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household.
- **"Processing"** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **"Sensitive Personal Information"** means Personal Data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data processed for the purpose of uniquely identifying a person, data concerning health, or data concerning a person's sex life or sexual orientation, as well as government-issued identifiers and financial information as defined by applicable law.
- **"Temporary Worker"** means an individual who works, or is applying to work, for the Company in the capacity of a Company employee whom the Company assigns to work at the Company's clients.
- **"Worker"** means an Internal Employee, or a Temporary Worker.

### Categories of Personal Data Collected

The Company collects Personal Data from you during the application process and throughout the scope of your employment with Company or its clients, as applicable. The categories of Personal Data collected may include the following:

- **Identifiers**, such as your name, employee/staff ID, date of birth, nationality, Social Security number or equivalent national identification number;

- **Contact Information**, such as your work and home addresses, telephone numbers, email addresses, and emergency contact details;
- **Information about your job**, such as job title, category and status, work location, department, employment contract, assigned tasks and projects, weekly hours, supervisor's name, start and end date, and reason for leaving;
- **Job qualifications**, such as your education, training, certifications, and prior work experience;
- **Monitoring information**, such as IT systems usage information related to your use of Company equipment, systems, and other resources; and
- **Communication details**, such as email content, business letter content, business documents, and chat content.

For Internal Employees and Temporary Workers, the Company also may collect additional Personal Data about you, such as:

- **Performance and disciplinary information**, such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances, and any outcome;
- **Information about your compensation and benefits**, such as your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that we provide to the insurer), hours and overtime, tax code, holiday entitlement, accrued salary information, and information relating to your pension;
- **Employment-Related Documents and Agreements**, such as employment agreements, confidentiality agreements, and proprietary rights agreements;
- **Financial information**, such as your bank details (for payroll and travel reimbursement purposes only) and business travel and entertainment data;
- **Health information**, as required by law or as necessary to manage the employment relationship, including benefits administration, occupational health, disability accommodation, workers' compensation, and leaves of absence;
- **Equal Opportunity Monitoring Data**, to the extent voluntarily provided, such as race, ethnicity, disability, and military veteran information;
- **Union membership status**, as required by law to ensure benefits, terms of employment, and employment policies comply with the Union's requirements; and
- **Termination and Post-Employment Information**, such as termination agreements, benefits notices, and unemployment compensations forms.

### Legal Basis for Processing

Under applicable data protection laws, including GDPR, we process your Personal Data based on one or more of the following legal grounds:

- **Contractual Necessity**: Processing necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract
- **Legal Obligation**: Processing necessary for compliance with our legal obligations

- **Legitimate Interests:** Processing necessary for our legitimate interests or those of a third party, provided these interests are not overridden by your interests or fundamental rights and freedoms
- **Consent:** Where you have given explicit consent to the processing of your Personal Data for one or more specific purposes
- **Vital Interests:** Processing necessary to protect your vital interests or those of another natural person
- **Public Interest:** Processing necessary for the performance of a task carried out in the public interest

For Sensitive Personal Information, we process such data only when necessary and with additional safeguards as required by applicable law.

### **Business Purpose for Use**

The Company uses Personal Data for all purposes related to the creation, administration, and termination of Internal Employees' and Temporary Workers' employment relationship with the Company. These purposes include, but are not limited to, the following:

#### **For Internal Employees and Temporary Workers**

- To prepare headcount reports and other reports related to the workforce of the Eastridge family of companies;
- To administer employee compensation, including, but not limited to, payment of wages and bonuses and income tax withholding and reimbursement of business expenses;
- To administer employee benefits;
- To administer performance appraisals, safety, and travel arrangements;
- To manage and administer pay adjustments or periodic bonuses;
- To administer leaves of absence as required by law or company policy;
- To monitor and enforce compliance with internal policies;
- To provide employee contact information to current and prospective customers;
- To engage in succession planning;
- To administer access to the physical facilities of Company;
- To administer training of employees of the Eastridge family of companies worldwide;
- To comply with mandatory government reporting requirements;
- To provide Help Desk support to employees of the Company family of companies worldwide; and

- If you are a Temporary Employee: to place you with clients by matching your qualifications against the client's staffing needs; to manage and administer the assignment to a client; and to create reports, including reports detailing turnover and retention rates.

### **For All Workers**

- For recruitment;
- To assess qualifications of applicants and eligibility to work;
- To administer secure access to Company's IT resources worldwide;
- For emergency contact purposes;
- To conduct audits as required by law;
- To resolve issues submitted to the Company's hotline;
- To exercise the Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel;
- To meet legal and regulatory requirements including civil discovery in litigation involving the Company or affiliated companies;
- To facilitate administrative functions, including, but not limited to, the management and operation of information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning, and the maintenance of licenses, permits and authorizations applicable to the Company's or Company's customers'/clients' business operations; and
- Equal opportunities monitoring.

### **Data Retention Period**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Notice, for as long as your employment relationship exists with us, or as needed to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

The criteria used to determine our retention periods include:

- The duration of your employment relationship with us
- Whether there is a legal or contractual obligation to which we are subject
- Whether retention is advisable in light of our legal position (such as regarding applicable statutes of limitations, litigation, or regulatory investigations)

### **International Data Transfers**

As a global organization, we may transfer your Personal Data between countries to fulfill the purposes described in this Notice. When we transfer your data internationally, we implement appropriate safeguards to ensure adequate protection of your information, which may include:

- Standard Contractual Clauses approved by the European Commission
- Binding Corporate Rules
- Certification mechanisms such as the EU-US Data Privacy Framework
- Contractual arrangements with data recipients

### Your Data Protection Rights

Depending on your location, you may have certain rights regarding your Personal Data. These may include:

- **Right to Access:** Request information about what Personal Data we hold about you and how we process it
- **Right to Rectification:** Request correction of inaccurate or incomplete Personal Data
- **Right to Erasure:** Request deletion of your Personal Data in certain circumstances
- **Right to Restrict Processing:** Request restriction of processing in certain circumstances
- **Right to Data Portability:** Receive your Personal Data in a structured, commonly used, machine-readable format
- **Right to Object:** Object to certain types of processing, including direct marketing
- **Right to Withdraw Consent:** Withdraw consent at any time when we process data based on consent
- **Right to Lodge a Complaint:** File a complaint with a supervisory authority

Additional rights may be available to you under applicable local laws. For more detailed information about your rights and how to exercise them, please refer to our Privacy Policy.

### Client Data Collection

This Notice is directed solely to the Company's collection and use of your Personal Data. Clients of the Company may also collect the Personal Data of Temporary Employees, and any such collection and use by clients shall be governed by the client privacy policies and notice. Where we act as a processor for client data, we have agreements in place to ensure appropriate data protection.

### Data Security

We have implemented appropriate technical and organizational measures to protect your Personal Data against unauthorized or unlawful processing, accidental loss, destruction, or damage. These measures are reviewed and updated when necessary.

### Changes to This Notice

We may update this Notice from time to time to reflect changes in our practices or to comply with legal requirements. We will notify you of any material changes by posting the updated Notice on our website or through other appropriate communication channels.

## Contact Information

If you have any questions or concerns about this Notice or about our data processing practices, you can contact us at:

- **Email:**
  - [privacy@workwellna.com](mailto:privacy@workwellna.com) (for privacy specific inquiries)
  - [externalhr@workwellna.com](mailto:externalhr@workwellna.com) (for general inquiries)
- **Phone:** 1.800.918.1678 (ask to speak to a member of the Human Resources Department)
- **Mail:**

Workwell North America  
Attn: Privacy Officer  
2355 Northside Drive. Ste 250  
San Diego, CA 92108

**Data Protection Officer:** For EU/UK data protection matters, our appointed Data Protection Officer can be contacted at [privacy@workwellna.com](mailto:privacy@workwellna.com).

Last Updated: November 3, 2025