

## Privacy Policy (HR Data)

This Privacy Policy describes how Park Place Technologies, LLC (“**PPT US**”, “**we**”, “**us**”) handles personal data<sup>1</sup> to which it is given access, relating to individuals located within the European Union or the United Kingdom, under the EU-U.S. Data Privacy Framework Principles (“**DPF**”), including its UK Extension. It applies to personal data which qualify as “HR Data” under the DPF, in accordance with the definition provided in the European Data Protection Board’s EU-U.S. Data Privacy Framework F.A.Q. for European Businesses (16 July 2024)<sup>2</sup>.

This Policy also applies to Curvature, LLC, a subsidiary of Park Place Technologies, LLC. References to “**PPT US**”, “**we**” and “**us**” in this Policy should be interpreted as references to Curvature, LLC, regarding the processing of personal data originating from the European Union or the United Kingdom which the latter may carry out.

### EU-U.S. Data Privacy Framework Principles

We comply with the DPF, as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal data transferred from the European Union and/or the United Kingdom to the United States, as described in this Policy. We have certified to the Department of Commerce that we adhere to the DPF with respect to such personal data.

If there is a conflict between the terms in this Privacy Policy and the DPF, the DPF shall govern.

The Federal Trade Commission has jurisdiction over our compliance with the DPF and, as such, we are subject to their investigatory and enforcement powers in that context.

To learn more about the DPF, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

### What types of personal data do we handle, and why?

In the course of our business activities, we may have access to certain categories of personal data, related to individuals within the European Union or the United Kingdom, which qualify as “HR Data”:

- **PPT Group employees.** We may access the following personal data on employees of the PPT Group, established in the European Union or the United Kingdom:
  - Name and surname;
  - Professional details, including job title, career progression information, dates of employment, salary and benefits, disciplinary measures, background checks and related information (e.g., previous employment history), training attendance and reports, as well as any other details contained within the employee’s internal file;
  - Contact details, including postal address of residence, personal and business phone number, personal and business e-mail address,

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<sup>1</sup> **Personal data** means any information relating to an identified or identifiable natural person or

<sup>2</sup> **HR Data**, therefore, refers to “human resources data collected in the context of an employment relationship” (see p. 3, Q1 of the F.A.Q.).

- National identification document copy and number;
- Portrait photograph (for internal identification purposes);
- Date of birth and age;
- Birth country, location and nationality;
- Gender;
- Ethnic group (and other data collected to address local governmental/legal reporting requirements – such as ESG requirements);
- Whether or not the employee consumes tobacco;
- Disability status and other health data (e.g., related to sick/maternity leave management);
- Visa and work permit status;
- Emergency contact information (name, phone number, e-mail address and relationship with employee of reference);
- Data collected through security software tools deployed by the PPT Group, including logs of access to PPT Group premises and certain areas within those premises, and activity logs generated in relation to networks, systems and/or devices managed by the PPT Group (including details such as user identification codes, timestamps and actions taken). This includes CCTV footage, and applies to e-mail systems, web browsing, file sharing systems and other information accessed using IT resources managed by the PPT Group.

It is important to note that the scope of information required by PPT US about an employee will sometimes change over the course of time. The reader of this Policy is welcome to make a request about the data required by reaching out to PPT US in writing, at: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

We access these personal data when strictly necessary to allow for the global supervision of human resource management for the PPT Group, including the taking of material decisions related to the management of specific employees. These personal data may also be accessed as needed to allow for centralized management of internal compliance assurance, access control and network/information security for the PPT Group. Personal data on emergency contacts, specifically, is used only to ensure that each employee's emergency contacts are duly accessible globally, as may be needed to ensure effective contact.

- **Job applicants.** We may access the cover letters, certificates and CVs of candidates for a position at the PPT Group in Europe (which may include candidates based in the European Union or the United Kingdom). In this case, we may access any personal data which the candidates choose to include in their CVs, such as:
  - Name and surname;
  - Contact details, including e-mail address and phone number;
  - Additional details contained in, or inferable from, submitted cover letters, certificates and CVs;

- Further professional details provided as part of the application process (e.g., preferred working conditions, compensation, etc.).

We access this personal data when strictly necessary to allow for centralized management of job applications for the PPT Group, and for specific consideration of applications which may be targeting positions at PPT US.

#### **Do we transfer any HR Data onwards, to other entities?**

As a rule, we do not sell data related to PPT Group employees or job applicants to any third parties, or otherwise share data with third parties, other than as mentioned below.

We may transfer HR Data on PPT Group employees to the following types of third parties:

- **Other PPT Group companies**, specifically Curvature LLC (located in the US) and Park Place Technologies Limited (located in the United Kingdom).
  - HR Data is shared with these companies because they undertake the global management of human resources for the PPT Group, as well as global management of security for the PPT Group, jointly with PPT US.
  - These companies act as controllers in their own right, rather than as agents on behalf of PPT US, and are therefore autonomously responsible for ensuring that these HR Data are correctly handled.
  - In accordance with the Obligatory Contracts for Onward Transfers Supplemental Principle of the DPF, these companies are bound by the PPT Group's Group Data Protection Compliance Framework, which is a set of internal governance documents establishing controls to ensure that personal data is handled in accordance with applicable data protection requirements – including those of the DPF. As such, continuity of the protection of personal data under the DPF is ensured in the context of this data sharing.
- **Service providers** which provide SaaS (software as a service) human resource management, budgeting and planning management, security and access control management platforms and tools used by PPT US, and which may have access to personal data stored by PPT US on their platforms and tools.
  - These companies act as agents on behalf of PPT US, regarding the processing of HR Data inherent to PPT US' use of their platforms and tools.

This may include personal data related to individuals within the European Union or United Kingdom, in which case the DPF applies in full. Under the DPF, PPT US will remain liable for damages caused by a failure of any of its agents, or other PPT Group companies, to handle personal data in a manner consistent with the DPF, save for where PPT US is not responsible for the event giving rise to those damages.

If you, as a PPT Group employee based in the European Union or the United Kingdom, wish to opt out of the disclosure of your personal data to third parties, or if you would like more information on the specific third parties to which we may transfer your data, please reach out to us at [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

Please note that your right to opt out, under the DPF, does not apply to transfers of your personal data to PPT US' agents. In any case, PPT US has entered into written agreements with these agents to ensure the following, in accordance with the DPF:

- The transfer of HR Data to agents is only performed for limited and specified purposes (i.e., the use of their platforms and tools by PPT US for human resource management, budgeting and planning purposes);
- Agents are required to provide at least the same level of privacy protection as is required by the DPF;
- Agents are required to effectively process received HR Data in a manner consistent with PPT US' obligations under the DPF; and
- Agents must notify PPT US if they determine that they can no longer provide the same level of privacy protection as is required by the DPF, in which case PPT US will take reasonable and appropriate steps to stop and remediate unauthorized processing of the transferred HR Data.

We will also provide a summary or representative copy of the relevant privacy provisions contained within our agreements with agents to competent authorities, upon a valid request.

It is also important to understand that we may be required to disclose personal data in response to lawful requests by competent U.S. public authorities, including to meet national security or law enforcement requirements.

### **How can you reach out to us?**

For any questions regarding this Policy, our adherence to the DPF or our practices regarding personal data, you can reach out to us at: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

### **What are your rights, as a data subject? How can you react if you believe that we are mishandling your personal data?**

Under the DPF, you are entitled to:

- Access the HR Data we hold about you;
- Request the correction, amendment or deletion of HR Data we hold about you, where it is inaccurate or has been processed in violation of the DPF.

The above rights can be restricted where the burden or expense for us in allowing them to be exercised would be disproportionate to the risks to your privacy, in your specific case. Restriction may also happen if allowing your rights to be exercised would violate the rights of other persons. However, we will always endeavor to allow the exercise of your rights to the fullest extent feasible.

You can exercise these rights by contacting us, at [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

In any case, you retain the right to opt-out from any further processing activities which we might wish to carry out using your HR Data, for purposes which are different to or incompatible with the purposes laid out in this Policy. We will notify you of any such further processing if and when it takes place, so you can exercise this right; you can also do so spontaneously by using the e-mail address provided above.

While we do share sensitive HR Data with third parties under the scope of this Policy, this is done only where strictly necessary to establish legal claims or defenses, or to carry out PPT Group obligations in the field of employment law. This exempts us from requiring your specific consent or opt in regarding this data sharing, under the Sensitive Data Supplemental Principle of the DPF. Should this change in the future, we will notify you so you can exercise this right; you can also do so spontaneously by using the e-mail address provided above.

In compliance with the DPF, we commit to resolving complaints about our collection or use of your personal data. European Union or United Kingdom individuals with inquiries or complaints regarding this Policy, or our compliance with the DPF, should first contact us at: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

Should you consider that we have not been able to fully resolve your complaint, you remain entitled to submit your complaint to a data protection authority within the European Union, or to the United Kingdom's Information Commissioner's Office, so that the panel established by the European Union data protection authorities (DPAs) – or, where applicable, the Information Commissioner's Office – can engage us to fully resolve the issue. We may also proactively refer your complaint to these authorities.

We commit to cooperating with this panel and complying with the advice given by these authorities with regard to HR data transferred from the European Union or the United Kingdom, in the context of an actual or potential employment relationship within the PPT Group.

- In particular, this means that we will cooperate with these authorities in the investigation and resolution of any complaints brought against us under the DPF. It also means that we will comply with any advice given by these authorities in these cases, including where they consider that we need to take specific action to comply with the DPF (such as by offering remedies or compensation to you or other affected individuals), and that we will provide written confirmation to these authorities that such action has been taken.

Under certain conditions, it may be possible for you to invoke binding arbitration against us for complaints regarding DPF compliance which have not been resolved through the above mechanisms. Please refer to [Annex I of the DPF](#) for more information.