

## **Branch Metrics, Inc. Privacy Policy For Job Applicants and Employees**

Welcome to Branch! We are an analytics and attribution provider dedicated to creating consistent cross-platform experiences for today's apps and mobile device users. This policy describes the information Branch Metrics, Inc. and/or its subsidiaries ("Branch", "We", "Us") collect, as well as how we use, retain, share and delete that information as part of our recruiting and employment functions.

### **INTERNATIONAL DATA TRANSFERS**

Branch is a United States company. By applying for or accepting employment with Branch, you agree that your information will be transferred to and stored within the United States. If you are located outside of the United States, please note that applicable data protection laws may not be equivalent to the laws of your local jurisdiction. Branch implements safeguards necessary to comply with GDPR, and you may request more information on particular safeguards at any time by sending an email to [privacy@branch.io](mailto:privacy@branch.io).

### **INFORMATION WE COLLECT**

This policy covers the information we collect during the application and recruiting process. This data, which may be collected directly from you or third parties, includes:

- Your name, email address, phone number, and other information about you;
- Your resume or CV, cover letter, previous work and education experience, and any other personal information you submit as part of your employment application;
- Any sensitive information you submit as part of the application or recruitment process, including demographic information and health information;
- Emergency contacts, references, and background reports;
- Government or national identification number, bank account number, dependent information, spousal or partner information, health information, and other information that may be necessary for the administration of payroll, health insurance or benefits;
- Other information as reasonably necessary for Branch's business purposes.

### **HOW WE USE YOUR INFORMATION**

Branch collects personal information about you to carry out the application and recruitment process, and to support day-to-day business and human resources functions and activities, including:

- For talent acquisition and employee lifecycle management purposes, such as recruiting and hiring job applicants (including, where permitted by and in compliance with applicable law, conducting background checks), administering employee compensation and benefits, and managing the employee termination process;
- For performance management purposes, including performance reviews, employee mobility and talent development, and attendance monitoring;
- For operational purposes, such as managing the company directory, accounting for purchases by employees, and developing business continuity and disaster recovery plans;
- For policy enforcement purposes, such as conducting ethics and disciplinary investigations, administering privacy and security training programs, and managing audit and compliance matters; and
- To comply with applicable laws, regulations, legal processes, or enforceable government requests as necessary.

If you are offered and accept employment with Branch, the information collected during the application and recruitment process will become part of your employment record.

*IF YOU ARE AN EU DATA SUBJECT UNDER GDPR, OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION*

We collect and process information you provide us to assess the potential for entering an employment contract with you. Should you accept an offer of employment from Branch, we will continue to process your information based on our legitimate interests in managing and administering business and human resources functions and activities, as described above. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

**HOW INFORMATION IS SHARED**

We do not share your personal information except in the limited circumstances described below:

*WHEN YOU AGREE OR DIRECT US TO SHARE*

You may agree or direct us to share your personal information with others as part of your employment with Branch. For example, in certain jurisdictions consent may be legally required for Branch to perform a background check.

*FOR EXTERNAL PROCESSING*

We may share your personal data with our employees, contractors, consultants and other parties (including Branch affiliates) who require such information to assist us with establishing, managing or terminating our employment relationship with you. We may also share your personal data with service providers, including technology providers that assist us with operating our business, or with other parties in a manner consistent

with the use and disclosure provisions of this Policy.

#### *FOR LEGAL REASONS OR TO PREVENT HARM*

We may preserve or disclose information about you to comply with a law, regulation, legal process, or governmental request; to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of the Services or the physical safety of any person.

Please note: Our policy is to notify you of legal process seeking access to your information, such as search warrants, court orders, or subpoenas, unless we are prohibited by law from doing so. In cases where a court order specifies a non-disclosure period, we provide delayed notice after the expiration of the non-disclosure period. Exceptions to our notice policy include exigent or counterproductive circumstances, for example, when there is an emergency involving a danger of death or serious physical injury to a person.

#### *TRANSFER OF BUSINESS ASSETS*

If we are involved in a merger, acquisition, or sale of assets, we will continue to take measures to protect the confidentiality of personal information and give affected users notice before transferring any personal information to a new entity.

Additionally, Branch may share or sell aggregated, de-identified data that does not identify you with our partners and the public. When we provide this information, we perform appropriate procedures so that the data does not identify you and we contractually prohibit recipients of the data from re-identifying it back to you.

#### **HOW TO ACCESS OR DELETE YOUR PERSONAL INFORMATION**

You may contact your local HR representative for information about how to access or delete information Branch stores related to your employment. You may also request information by sending an email to [privacy@branch.io](mailto:privacy@branch.io).

#### **EUROPEAN RESIDENTS: RETENTION OF PERSONAL INFORMATION**

Information collected from applicants who do not receive an employment offer will be deleted within fifteen (15) months of the rejection date unless otherwise required by applicable law, or unless the prospective employee has requested that Branch keep his or her application on file for consideration for future positions.

Branch will retain the collected information of former employees for a reasonable period following termination, but in no circumstance for a shorter period of time than required under applicable law.

#### **EUROPEAN RESIDENTS: YOUR RIGHTS REGARDING PERSONAL DATA**

Applicants and employees within the EEA have certain rights under GDPR and other

applicable data protection laws. These include the right to request access or to update your information, request that it be deleted, or object to Branch using it for certain purposes.

If you wish to exercise a right of access please contact [privacy@branch.io](mailto:privacy@branch.io). We will respond to any requests in accordance with applicable law, and so there may be circumstances where we are not able to comply with your request.

If you are located within the EEA and if you can't find the answer to your question in this policy, you may contact us at [privacy@branch.io](mailto:privacy@branch.io). Depending on your country of residence, you may also raise any questions or concerns you have regarding your personal information with your local data protection authority.

### **Adherence to Branch Policies**

Anyone who is hired by Branch will be required to adhere to all Branch policies, where consistent with applicable local law. Failure to adhere to such policies may result in discipline up to, and including, termination. All individuals whose responsibilities include the processing of personal data on Branch's behalf are expected to protect that data by adherence to Branch's Privacy Policy.

If you have any concerns regarding how your data is processed, you can contact Branch's Data Protection Officer at: [privacy@branch.io](mailto:privacy@branch.io)