

WCG Applicant and Worker Privacy Notice

Effective Date: October 23, 2024

SCOPE

This Privacy Notice applies to employees, contractors, contingent and other personnel (collectively, “**Workers**”) and applicants and prospective Workers (collectively, “**Applicants**”) whose Personal Information WCG Clinical, Inc. (“**WCG**”) may collect and process in the course of its human capital management, from submission of an application, throughout the course of an individual’s tenure with the WCG, and following such employment or services (collectively, the “**HR Operations**”). As used in this Privacy Notice, “**Personal Information**” has the meaning given to it under the law where you live, but typically refers to information that can be used to identify you as an individual; meanwhile our activities taken with respect to your Personal Information are referred to as “processing.”

The terms “**WCG**,” “**we**,” “**us**,” and “**our**” include WCG and its affiliates and subsidiaries. This Privacy Notice explains the kinds of Personal Information we may collect, how we intend to use and share that information, and the rights you may have related to these processing activities.

An Important Note: This Privacy Notice only applies to data that we collect and process when interacting with you in your capacity as an Applicant or Worker. Unless otherwise indicated on a specific website page or form, this Privacy Notice does not apply to any of the Personal Information that we process through your use of our public-facing websites, applications, or services, which are subject to our user Privacy Policy governing those properties.

PERSONAL INFORMATION WE COLLECT

WCG collects Personal Information from Applicants and Workers as described below.

Personal Information We Collect from You Directly. We may collect the following Personal Information that you provide to us:

- **Profile/Demographic Information.** Name, address, phone number, email address, date of birth, passport number, driver’s license number, driving record, Social Security number or other government-issued identification number, employment history, education information, professional qualifications, salary information, financial information related to credit checks, bank details for payroll, language abilities, contact information of third parties in case of an emergency, beneficiaries under any benefit program, and other information that you may provide on a resume/CV or application form. We may also collect other sensitive Personal Information such as details of health and disability, including medical information, health insurance information, mental health, medical leave, and maternity leave; information about national origin or immigration status; and optional demographic information such as race or veteran status, to help us to comply with our reporting obligations and provide insight into equity and inclusion objectives.
- **Communications with Us.** Personal information such as personal contact information when an Applicant or Worker communicates with us, for example to inquire about employee benefits.
- **Posting on Intra-Company Communication Channels.** WCG may offer, enable, or require Workers to utilize WCG-provided intra-company accessible sites, video-enabled meetings, pages, messaging channels, apps, blogs, or forums (“**Intra-Company Communication Channels**”).

WCG and other individuals who use the Intra-Company Communication Channels may collect Personal Information and other information you submit or make available when using or participating in the Intra-Company Communication Channels. Personal Information collected or generated about you when using Intra-Company Communication Channels may be considered “public” and may not be subject to the same privacy protections set forth herein.

Personal Information We Collect Automatically.

- **Worker Use of WCG Information Technology Systems and Networks.** WCG may collect certain information automatically through the course of its Workers’ employment or services, such as Internet protocol (IP) address, inferred location based on IP address or activities, device identifiers associated with a computer or device, mobile carrier and related information, activity logs, and other information about activities Workers may engage in on WCG property, equipment, accounts, systems and networks. WCG may monitor and review Workers’ uses of WCG equipment, accounts, information technology systems and networks, including its phone networks, computer networks, including those used to access the Internet, videoconferencing systems and other Intra-Company Communications Channels. WCG may access and review Workers’ video-recordings, meeting transcripts, electronic files, chat and other forms of real-time messages, and emails sent or stored on its information technology systems, including accounts, computers and devices provided to Workers, or on Workers’ devices on which WCG systems or tools are enabled subject to WCG’s internal IT terms and policies.

PLEASE NOTE THAT WORKERS HAVE NO EXPECTATION OF PRIVACY WHILE ON WCG PREMISES OR USING WCG INFORMATION TECHNOLOGY SYSTEMS, DEVICES, NETWORKS, AND ELECTRONIC COMMUNICATION TOOLS REGARDLESS OF LOCATION. PLEASE ALSO NOTE THAT THIS PRIVACY NOTICE DOES NOT ESTABLISH, AND SHOULD NOT BE CONSTRUED TO MEAN, THAT ALL WORKERS WILL HAVE ACCESS TO, OR WILL PARTICIPATE IN, THE SYSTEMS, NETWORKS, DATA, PROGRAMS AND OTHER BUSINESS ACTIVITIES DESCRIBED IN THIS PRIVACY NOTICE.

- **CCTV Footage.** WCG may monitor its premises using CCTV cameras.
- **Feedback.** From time to time, we may ask you to give us your feedback, option or participate in surveys or polls. If you decide to participate, you may be asked to provide certain information which may include Personal Information. Any information you elect to provide when you provide feedback is provided by you voluntarily.
- **Promotional Activities.** Occasionally, WCG may run promotional activities for the benefit of its Workers. Workers who elect to participate may be asked to provide Personal Information to administer the activity and award prizes or other types of recognition.

Information from Other Sources. We may collect or receive information about Applicants and Worker from other sources, including through third-party services and organizations to supplement information provided by you. For example, where relevant to the role in question and as permitted by law, we may conduct background and credit checks on Applicants prior to employment with WCG.

Miscellaneous Information. We may receive or collect other miscellaneous information (for example, information an Applicant chooses to disclose during the interview process, whether in oral or written form, opinions generated during the interview process, and information provided to us during performance reviews).

HOW WE USE YOUR INFORMATION

We process Personal Information for a variety of business purposes including:

- To assess your suitability, aptitude, skills, qualifications, and interests for employment with or provision of services to WCG;
- To communicate with you about the application process and/or your application;
- To assist you with obtaining an immigration visa or work permit (where required and requested by you);
- To verify your eligibility to work;
- To take steps, at your request, prior to entering into a relationship with you (for example, after we have sent you an offer, to process certain Personal Information to enter into and commence employment);
- Workflow management, including assigning, managing and administering projects;
- HR Operations administration and communication;
- Payroll and the provision of benefits;
- Invoice payments;
- Compensation, including bonuses and long-term incentive administration, stock plan administration, compensation analysis, including monitoring overtime and compliance with labor laws, and company recognition programs;
- To pursue our legitimate interests (for example, fraud prevention, network and information security, disclosure to affiliated organizations for administrative tasks, Worker monitoring for safety or management, whistleblowing schemes, enforcement of legal claims, and research purposes);
- Job grading activities;
- Performance and Worker development management;
- Organizational development and succession planning;
- Benefits and personnel administration;
- Absence management;
- Helpdesk and IT support services;
- Internal and/or external or governmental compliance investigations;
- Internal or external audits;
- Where it is necessary for the establishment, exercise or defense of legal claims;
- Diversity and inclusion initiatives;
- Restructuring and relocation;
- Emergency contacts and services;
- Worker safety;
- To comply with our legal obligations;
- Processing of Worker expenses and travel charges;
- Acquisitions, divestitures, and integrations; and
- As you otherwise offer, agree or consent.

HOW WE DISCLOSE YOUR INFORMATION

We may share Personal Information as described in this Privacy Notice (e.g., with our third-party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.

Vendors and Service Providers. WCG may share Personal Information we receive pursuant to this Privacy

Notice with vendors and service providers. The types of service providers to whom we entrust Personal Information include service providers for: (i) maintaining our HR Operations; and (ii) the provision of IT and related services.

Affiliates and Subsidiaries. WCG may share Personal Information with our affiliates and subsidiaries for our and our affiliates' and subsidiaries' internal business purposes.

Other Workers. When you use Intra-Company Communication Channels, in addition to the content that you choose to generate and contribute, other Workers may be able to see certain identifying information about you, such as your name, job title, role, photo or other information maintained as part of the corporate directory to facilitate secure internal communications. We require all Workers to follow the WCG's Code of Conduct/Employee Handbook and to adhere to applicable policies and standard operating procedures pertaining to respectful, secure and privacy-aware intra-WCG communications and data handling.

Disclosures to Protect Us or Others. We may access, preserve, and disclose your Personal Information if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal processes, such as court orders or subpoenas; (ii) protect your, our, or others' rights, property, or safety; (iii) enforce our policies or contracts; (iv) collect amounts owed to us; or (v) assist with an investigation or prosecution of suspected or actual illegal activity.

Merger, Sale, or Other Asset Transfers. If we are involved in an actual or proposed merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another entity, your information may be transferred as part of such a transaction as permitted by law and/or contract.

INTERNATIONAL DATA TRANSFERS

All information collected via or by WCG may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States, to carry out our HR Operations. We take commercially reasonable steps to safeguard Personal Information consistent with the requirements of applicable laws.

INDIVIDUAL RIGHTS IN PERSONAL INFORMATION

In accordance with applicable law, you may have the right to:

- **Access to and portability of your Personal Information**, including: (i) confirming whether we are processing your Personal Information; (ii) obtaining access to or a copy of your Personal Information; (iii) receiving an electronic copy of Personal Information that you have provided to us, or asking us to send that information to another company (the "right of data portability");
- **Request correction of your Personal Information** where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your Personal Information, or we may refer you to the controller of your Personal Information who is able to make the correction;
- **Request deletion of your Personal Information**, subject to certain exceptions prescribed by law; and
- **Request restriction of or object to our processing of your Personal Information**, including the right to (i) withdraw your consent to processing, (ii) object to, or restrict, processing of your sensitive Personal Information for certain purposes, or (iii) opt out of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you, if applicable, where each such requests are permitted by law.

If you would like to exercise any of these rights, contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, WCG will take steps to verify your identity before fulfilling your request. You have the right to not receive discriminatory treatment or be retaliated against for exercising these rights.

An agent authorized to act on your behalf, may make a verifiable consumer request to exercise the rights described above related to your Personal Information. You may also make a verifiable request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth in the “Contact Us” section below for additional instructions.

DATA RETENTION

WCG retains the Personal Information we receive as described in this Privacy Notice for as long as necessary to fulfill the purpose(s) for which it was collected, carry out our HR Operations, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, comply with applicable laws, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data. Additionally, we endeavor to retain all such Personal Information in accordance with legal requirements.

SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice. Unfortunately, we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

THIRD PARTY WEBSITES/APPLICATIONS

Various resources and sites at WCG may contain links to third party websites/applications and other websites/applications may reference or link to WCG. These third-party services are not controlled by us. We encourage Applicants and Workers to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

SUPERVISORY AUTHORITY

If you are an Applicant or Worker located in the European Economic Area, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

CHANGES TO OUR PRIVACY NOTICE AND PRACTICES

We may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Notice if you continue your employment with or services to WCG after the new Privacy Notice takes effect. If at any point you do not agree to any portion of the Privacy Notice in effect, you must immediately contact HR.

CONTACT US

If you have any questions about our privacy practices or this Privacy Notice, please contact WCG by email

at privacy@wcgclinical.com.

SUPPLEMENTAL NOTICE FOR RESIDENTS OF SPECIFIC US STATES

The following table describes the categories of Personal Information WCG has collected and the categories of third parties to which such information has been disclosed for a business purpose in the preceding 12 months:

Category of Personal Information Collected by WCG	Category of Third Parties to which Personal Information is Disclosed
Identifiers A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number or other similar identifiers.	<ul style="list-style-type: none">• Analytics service providers• Internet service providers• Government entities• WCG affiliates• Insurance providers• Background screening providers• Benefits providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information including medical records, or health insurance information.	<ul style="list-style-type: none">• Analytics service providers• Government entities• WCG affiliates• Insurance providers• Background screening providers• Benefits providers
Sensitive Personal Information A social security, driver's license, state identification card, or passport number, an account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation, racial or ethnic origin, citizen or immigration status, religious or philosophical beliefs, or union membership, contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication, or genetic information.	<ul style="list-style-type: none">• Government entities• WCG affiliates• Insurance providers• Background screening providers• Benefits providers

Protected classification characteristics under California or federal law Age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<ul style="list-style-type: none"> • Government entities • WCG affiliates • Insurance providers • Background screening providers • Benefits providers
Sensory data Audio, electronic, or visual information.	<ul style="list-style-type: none"> • Service providers • WCG affiliates
Geolocation data Physical location or movements (of WCG-owned or authorized devices)	<ul style="list-style-type: none"> • Service providers • WCG affiliates
Professional or employment-related information Current or past job history or performance evaluations.	<ul style="list-style-type: none"> • Government entities • WCG affiliates • Insurance providers • Background screening providers • Benefits providers

The categories of sources from which we collect Personal Information are described above in the section titled “Personal Information We Collect.”

We use the data we collect about you for the business purposes described above in the section titled “How We Use Your Information.” In addition, we may share any data we hold about you with the parties described above.

Your Personal Information is not (i) “sold” or (ii) “shared” by us, nor do we have actual knowledge that we share or sell Personal Information of persons under 16 years of age.

Data Retention. The Data Retention section above outlines the criteria we utilize for determining how long to retain data.

Sensitive Personal Information. Processing of sensitive Personal Information is carried out exclusively for the purposes outlined above, to the extent permitted under law. This processing activity may include service providers and government entities.

SUPPLEMENTAL NOTICE FOR CHINA RESIDENTS

This Supplemental Notice for China only applies to our processing of personal information that is subject to the applicable data protection laws of China, including the Personal Information Protection Law (“PIPL”).

Your Privacy Rights. In addition to the applicable rights listed above, you have the following additional data subject rights: the right to request an explanation on how your personal information is handled, the right to file a lawsuit, and the right to allow your next of kin to exercise any of your rights unless other arrangements have been made before your death. For purposes of the PIPL, the WCG Privacy Officer is your data handler, and data subject requests may be directed to the contact information provided above.

International Transfers. When transferring personal information which originates in China internationally, we will comply with the applicable requirements governing the transfer and processing of such data. Providing WCG information for employment, through the website, or otherwise constitutes your consent for our international transfer of your data.

List of Entrusted Persons. If permitted under applicable law, data subjects may request a copy of our service providers (entrusted persons).