Relay Payments Inc.

Employee, Independent Contractor, and Job Applicant Privacy Policy

Effective Upon: December 5, 2024

Last Updated: December 5, 2024

At Relay Payments Inc. ("**Relay**", "**us**", "**our**", or "**we**"), we are strongly committed to transparency, and we want each of our employees, independent contractors, and job applicants ("**workforce members**", "**you**", or "**your**") to understand how we collect, use, disclose, and protect information relating to an identified or identifiable natural person, or as otherwise defined under applicable Privacy Laws, ("**Personal Data**"), as well as how you can manage the Personal Data we collect from you. This Privacy Policy does not cover other aspects of your employment. We reserve the right to change our Privacy Policy from time to time. Please Contact Us immediately if you have any questions or concerns regarding this Privacy Policy.

This policy is executed in the English language, and in the event of any conflict between the English version and any translation into another language, the English version shall prevail, with any such translation being provided solely for convenience and not having any binding effect.

I. TYPES OF PERSONAL DATA WE COLLECT

We collect two basic types of data from you: Personal Data and Non-Personal Data. Non-Personal Data includes information that does not personally identify you (i.e., aggregated data) or information that has been anonymized (collectively, "**Non-Personal Data**").

The Personal Data we collect depends on the reason it is sought, and may include:

- **Contact Information**. Name, email address, postal address, phone number, business contact information, beneficiary and emergency contact information, and other contact information.
- **Demographic Data.** Date of birth, gender, nationality, race, marital and dependent status.
- **Government Identification.** Social Security number, driver's license number, or other government identification numbers.
- **Financial Data.** Compensation, benefits, tax information related to payroll, expenses, bank account information, bonus and pension information, and company credit card usage.
- **Employment Related Data.** Information regarding performance, discipline, grievance, training, previous employment, work history, leave requests and absences, and background checks.
- **Company Equipment Information.** Information regarding use of company IT systems including email, internet systems, computers, laptops (including via remote access) telephone systems and mobile devices; reviewing network traffic e-mails or other messages or data sent or received through our systems and inspecting data stored on individual file directories, hard drives or printed electronic media.

- **Correspondence.** Letters about a pay raise or to your mortgage company confirming your salary.
- **Education Data.** Education, certifications, and qualifications.
- **Physical or Mental Health Data.** Health and attendance records, COVID-19 vaccination or testing records, medical records resulting from on-the-job injuries or accidents. All physical or mental health data, including COVID-19 vaccination or testing records are identified as strictly confidential, and maintained in physical and/or electronic files separate from your regular personnel file.
- **Biometric Data.** Photographs for employee identification cards and systems.
- **Other.** Photograph and other personal details included in a resume or cover letter, if applicable.

Please be aware, if you do not provide information when requested, we may be unable in some circumstances to comply with our obligations and we will inform you about the implications of that decision.

Personal Data we collect and hold about Related Persons

As a result of certain individual's relationship with you, such as family members, we may collect and process Personal Data about those individuals ("**Related Persons**"). We collect Personal Data about Related Persons in connection with emergency contacts and the benefits and services we provide, this data may include:

- Contact information. Name, email, postal address, phone number, and emergency contact information.
- Identification Information. Photograph, Social Security number or other government identification number.
- Benefits and Services Data. Information necessary to extend the benefits and services that may be available to a related person as a family member or related person of our employees, including insurance-related information, claims-related information, disbursement-related information, and other protected characteristics such as race, sexual orientation, and health conditions.

Although we often collect the data described above directly from Related Persons, we also collect this data from employees related to these persons, as well as our benefit administrators. In addition, we may also collect this data through service providers and other third parties that collect it on our behalf, such as communications providers.

Special Category Information

Some of the data that we may collect as a result of providing employment checks, employment identification, and Benefits and Services is particularly sensitive (e.g., biometric photo data, data revealing racial or ethnic origin, political opinions, sex life, sexual orientation, religion or other beliefs, data concerning health, criminal background or trade union membership). We only collect this information as provided by or consented by you.

Such sensitive data is only shared for the purpose of providing the services you request (e.g., health benefits) or as consented for (e.g., employment photograph) and will not be shared or used by us for any other purposes.

II. HOW WE COLLECT PERSONAL DATA

You may provide us with Personal Data in several ways, including, for example when you:

- apply for employment with us;
- during the course of employment with us;
- video interviews; or
- contact us and disclose Personal Data to us.

We may collect Personal Data in several ways, including in person, in writing, over the phone, by email, online through social media platforms (e.g., LinkedIn), or our websites.

We will generally collect Personal Data about you from you directly. However, there may be occasions when we collect Personal Data about you from other sources (such as our third-party service providers) to, among other things, enable us to verify or update Personal Data contained in our records.

III. HOW WE USE PERSONAL DATA

We use Personal Data to run the business and manage our relationship with you during the recruitment process, while you are working for us, when your employment ends, and after you have left. This includes using Personal Data to comply with the terms of your employment and protect your rights. We may also use Personal Data to comply with legal or regulatory obligations (e.g., complying with duties under applicable employment, social security, and tax regulations).

We may use your Personal Data for the following purposes:

- employee/staff administration and operational functions (including payroll and benefits administration);
- facilitating Human Resources functions, such as, recruitment, career development, training, talent management, performance management, appraisals, and disciplinary and grievance management;
- business management and planning including internal administration;
- processing employee work-related claims (for example, insurance and worker's compensation claims);
- accounting and auditing;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- set up accounts in relation with management of expenses and professional travels;
- detecting and preventing any inappropriate behavior or breach of our policies, including securing and protecting our systems, resources, intellectual property, confidential information, and assets;
- gathering evidence for disciplinary action or termination;
- protecting against harm to the rights, property, or safety of us or our affiliates, our employees, contractors, customers, or the public;
- health administration services, including administration of benefits relating to your spouse or dependents;
- emergency contact purposes;
- complying with health and safety obligations; and
- complying with court orders and applicable law.

We may use Non-Personal Data for any legitimate business purpose.

As part of our ongoing compliance obligations, we as an employer may monitor company information, which may include employees' Personal Data, and data usage to ensure reasonable and lawful use of our IT systems; maintain cost control, protect property and proprietary information; and ensure employees fulfil their duties and comply with company policies.

- We reserve the right, at any time, to monitor and preserve any communications utilizing the company network and systems, including data or information access and usage.
- Monitoring may include (i) hardware and software based IT security applications to prevent unauthorized access or activity relating to company systems used by the employee's device and (ii) in certain cases an inspection of the employee's device as part of an internal audit or investigation.
- Information collected in connection with the use of devices to access and use our data or information may be accessed and reviewed by the following, each on a need-to-know basis:
    - Employee's supervisors and management;
    - Person acting for or on behalf of Relay;
    - HR department;
    - Legal department; and
    - IT department.

How we use Related Person Personal Data

We may use Personal Data we collect about Related Persons to:

- Communicate with Related Persons about benefits and services they are eligible for, events or activities our personnel invite Related Persons to, or in the event of an emergency;
- Administer the benefits and services Related Persons are eligible for;
- Respond to requests and inquiries Related Persons may send to us;
- Conduct internal investigations, audits, compliance, risk management, problem resolution and security operations;
- Fulfil contractual obligations to Related Persons and other third parties; and
- Comply with applicable law, rule, regulation, legal proceeding and government investigations, including relating to tax reporting and immigration.

IV. HOW WE DISCLOSE PERSONAL DATA

Except as set forth in this Privacy Policy, or as required or permitted by law, we do not disclose your Personal Data other than where required by law, or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering our employment relationship with you. Third-party service providers include, but are not limited to, payroll processors and benefits administration providers. **In no event will we sell or rent your Personal Data for monetary value.**

We may also disclose your Personal Data for the following additional purposes where permitted or required by applicable law:

- to third parties to help us with the uses described in the **How We Use Personal Data** section above;
- to other affiliates for the purposes set out in this Privacy Policy and as necessary to perform our obligations with you as an employee or independent contractor;
- to other third parties where we are under a duty to disclose your Personal Data in order to comply with any applicable legal obligation including a regulatory process, subpoena, warrant, or a binding request by a regulatory body, government or judicial authority;

- to assist during emergency situations or where necessary to protect the safety of persons;
- to collect a debt that you owe to us;
- in the event of a merger or acquisition, consolidation, change in control, transfer of assets, bankruptcy, reorganization, or liquidation; and
- to comply with your directions or any additional consent you have provided us.

See Appendix I for all of the categories of Personal Data we may disclose.

We disclose Non-Personal Data to third parties as reasonably necessary to meet our business needs.

V. HOW WE PROTECT PERSONAL DATA

We implement and maintain reasonably appropriate measures designed to ensure the security and integrity of your Personal Data. We store Personal Data that we have collected in secure operating environments. We will only retain your Personal Data for the period of time reasonably required to fulfil the purposes for which it was collected, unless we have a legal requirement for retention. Once you are no longer an employee of Relay, we will retain for only as long as may be required by applicable Federal and State record retention laws and thereafter will securely destroy your Personal Information. We may retain Non-Personal Data for as long as we have a business need to do so.

If you suspect an unauthorized use or disclosure of your Personal Data, please Contact Us as soon as possible.

VI. YOUR CHOICES

Individuals ("**Data Subjects**") in the European Economic Area (EEA) and the United Kingdom (UK) have certain rights under the General Data Protection Regulations (the "**GDPR**") and UK Protection Act 2018, as amended from time to time, in connection with your Personal Data. In the event, we collect Personal Data (as defined in the GDPR) that is subject to the GDPR, this section shall apply.

Data Controller

Relay is the Data Controller.

Processing Purposes and Legal Bases

Relay processes your Personal Data for the lawful purposes, and under the legal basis, set forth in the **How We Use Personal Data.**

Onward Transfer

Relay will not disclose Personal Data to a third party except as stated below:

We may disclose Personal Data to subcontractors and third-party agents. Before disclosing Personal Data to a subcontractor or third-party agent, we will obtain assurances by contractual agreement from the recipient that it will: (i) transfer such data only for limited and specified purposes; (ii) ascertain that the subcontractor or third-party agent is obligated to provide at least the same level of privacy protection as is required by the GDPR; (iii) take reasonable and appropriate steps to ensure that subcontractors and third-party agents effectively process the Personal Data transferred in a manner consistent with the organization's obligations under the GDPR; (iv) require subcontractors and third-party agents to notify the organization if it makes a

determination that it can no longer meet its obligation to provide the same level of protection as is required by the GDPR; (v) upon notice, including under (iv), take reasonable and appropriate steps to stop and remediate unauthorized processing; and (vi) provide a summary or a representative copy of the relevant privacy provisions of its contract with subcontractors and third-party agents to the Supervisory Authorities upon request.

Lavender also may be required to disclose, and may disclose, Personal Data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements, or in the event of a merger or acquisition.

Rights under GDPR

Right of Access

You have the right to obtain confirmation from us as to whether or not we process Personal Data from you, and you also have the right to at any time obtain access to your Personal Data stored by us.

Right to Rectification

If we process your Personal Data, we use reasonable measures to ensure that your Personal Data is accurate and up-to-date for the purposes for which your Personal Data was collected. If your Personal Data is inaccurate or incomplete, you have the right to require us to correct it.

Right to Erasure

You may have the right to require us to delete your Personal Data.

Right to Restrict Processing

You may have the right to request the restriction or suppression of Personal Data.

Right to Withdraw Consent

If you have given your consent to the processing of your Personal Data, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on the consent before the withdrawal.

Right to Data Portability

You may have the right to receive the Personal Data concerning you and which you have provided to us, in a structured, commonly used and machine-readable format or to transmit this data to another controller.

Right to Object

You may have the right to object to the processing of your Personal Data as further specified in this Privacy Policy and you may have the right to object to decisions being made with your Personal Data based solely on automated decision making or profiling.

Right to Lodge a Complaint with Supervisory Authority

You have the right to lodge a complaint with a data protection supervisory authority located in the European Union or UK. Further information about how to contact your local data protection authority is available at the website of the European Commission.

To submit a request to exercise the above rights related to your Personal Data or designate an authorized agent to make a request to access your Personal Data, please Contact Us.

Our security procedures and our obligations under applicable law mean that we may request proof of identity before we disclose your Personal Data to you.

Choices under GDPR

Data Subjects have the right to opt out of (a) disclosures of their Personal Data to third parties not identified at the time of collection or subsequently authorized, and (b) uses of Personal Data for purposes materially different from those disclosed at the time of collection or subsequently authorized. Data Subjects who wish to limit the use or disclosure of their Personal Data should submit that request to our Data Protection Officer. We will cooperate with Data Subjects' instructions regarding Data Subjects' choices.

All our general emails also contain an unsubscribe link at the bottom and you can unsubscribe to such emails at any time by clicking on that link.

Retention of Personal Data & Security

For more information, please refer to the **How We Protect Personal Data** section.

Transfer to the United States

As an employee of Relay, your Personal Data will be transferred to the United States. Relay relies on your consent or Article 49 of the GDPR for transfers of data collected from Data Subjects in the EU and EEA. Transfers are made to Relay only if the Data Subject has explicitly consented to the proposed transfer after having been informed of the possible risks of such transfers. Additionally, we transfer data as necessary for the performance of a contract between you as the Data Subject and Relay as the Controller, to data processors who have an agreement with us that includes protecting your privacy and the security of your data, and in cases where your Personal Data is necessary for the implementation of pre-contractual measures taken in accordance with your requests.

VII. CONTACT US

If you have any questions or concerns in connection with Relay's information collection practice summarized in this Statement, please send an email, with the subject heading "Privacy Policy Question," to privacy@relaypayments.com. In the email, please state your questions or concerns.

Our postal address is:

Relay Payments Inc.

Attn: Legal and Compliance/Privacy

400 Galleria Parkway, Suite 500

Atlanta, GA 30339

You may also submit questions regarding our Privacy Policy via our web form available at:

https://www.relaypayments.com/privacy-data-subject-request?hsLang=en

If you have any questions about our Services, please contact us at +1 (877) 735-2910.

APPENDIX I

To learn more about the categories of Personal Data we collect, how we collect it, why it is collected, and with whom we share the information, please see the chart below.

Category	What we collect	How we collect it	Why we collect it	With whom we share it
Identifiers	Name, mailing address, email address, phone number, and other contact information. For more information please see the Types of Personal Data We Collect section.	Collected online or offline when you directly provide it to us or through internal or external sources.	We collect this information for the purposes listed in the How We Use Personal Data section.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.
Biometric Data	Photograph	Collected when you directly provide it to us	Employment identification	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.
Internet or other similar network activity	Information regarding use of company IT and telephone systems. For more information please see the Types of Personal Data We Collect section.	Collected online when you directly provide it to us or through internal or external sources.	We collect this information for the purposes listed in the How We Use Personal Data section.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.
Geolocation Data	Collected via IP address while using company IT systems. For more information please see the Types of Personal Data We Collect section.	Collected online when you directly provide it to us or through internal or external sources.	We collect this information for the purposes listed in the How We Use Personal Data section.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.

Sensory Data	Audio and visual information collected via security camera or when otherwise provided. For more information please see the Types of Personal Data We Collect section.	Collected when you directly provide it to us or through internal or external sources.	We collect this information for the purposes listed in the How We Use Personal Data section.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.
Professional or employment-related Data	Employment history. For more information please see the Types of Personal Data We Collect section.	Collected online or offline when you directly provide it to us or through internal or external sources.	We collect this information for the purposes listed in the How We Use Personal Data section.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.
Non-public education Data	Education history and information. For more information please see the Types of Personal Data We Collect section	Collected online or offline when you directly provide it to us or through internal or external sources.	We collect this information for the purposes listed in the How We Use Personal Data section.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.
Inferences drawn from other Personal Data	Information generated during your employment reflecting your characteristics, preferences, trends, attitude, abilities, and aptitudes.	Collected online or offline when you directly provide it to us or through internal or external sources.	We collect this information for the purposes listed in the How We Use Personal Data section.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Personal Data section.