

SQUARETRADE, INC. d/b/a ALLSTATE PROTECTION PLANS EMPLOYEE PRIVACY STATEMENT

EFFECTIVE: 12/16/2022

Your privacy is very important to us. This privacy statement describes the privacy practices of SquareTrade, Inc. d/b/a Allstate Protection Plans and its subsidiaries (collectively, “SquareTrade” or the “Company”) as it relates to the collection, use and sharing of personal information relating to prospective, current, and former employees. We are committed to maintaining the accuracy, confidentiality, security, and privacy of personal information entrusted to us.

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1. INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect personal information and other information about you. Personal information is data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you. Other information does not and cannot reveal an individual's identity such as information that has been de-identified or aggregated.

We collect or create personal information about you in the following ways and from these sources:

Information collected directly from you:

We collect Personal information from you directly as part of your employment relationship, or when you seek employment. This includes personal information provided in resumes and employment applications, information collected in connection with the onboarding process and as part of your employment relationships including payroll information such as social security number, address, and bank information for direct deposits and information relating to subscribing to health and welfare benefits (e.g., short and long-term disability, medical and dental care) including beneficiary and emergency contacts information.

Information collected automatically:

We collect information from you when you use our websites, mobile apps, view our emails or otherwise engage with us through a computer or mobile device ("Sites"). We may monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources which may result in the collection of personal information about you. This monitoring may include the use of cameras in and around our premises or electronic monitoring technologies via our networks.

Information collected from third parties:

We collect personal information about you from third parties such as consumer reporting agencies, job websites, application providers, and data providers for purposes of employment related purposes, to maintain applicable benefits and for other purposes stated below.

Information created about you:

We collect or create information about you based on our interaction with you as a prospective or current employee such as interview notes, performance information, and wage and benefit information.

2. CATEGORIES OF PERSONAL INFORMATION

The following are the categories of personal information that we have collected and shared for at least the past 12 months, and examples of the personal information that fall into those categories:

Personal information categories	Examples
Personal identifiers	Name, alias, signature, postal address, email address, unique personal identifier, online identifier, internet protocol (IP) address, phone number, date of birth, Social Security number, driver’s license number, state identification number, passport number.
Personal characteristics	Age, race, ancestry, national origin, citizenship, religion, 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), and other description of your physical characteristics (e.g., height).
Biometrics and multimedia information	Fingerprint, voice print, audio, electronic, visual or other recordings.
Employment information	Account name, bank account or credit card number or other payment or financial information, family member information, medical information or health insurance information or other similar identifiers.
Education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information.
Geolocation data	Physical location, movements, or trip tracking information.
Inferences	In some cases, we may draw inferences from the personal information collected to create a profile reflecting preferences, characteristics, trends, predispositions, behavior, attitudes, and aptitudes, which may also be considered to be personal information.

<p>Internet or other electronic network activity information</p>	<p>Browsing history, search history, information regarding your interaction with our website, application or advertisement, links you use or web pages you visit while visiting our site or applications, browser type, internet service provider (ISP), cookies, and mobile device information including device identifier or other information.</p>

Our Sites are not intended for children. We do not knowingly collect any information from children under the age of sixteen.

Sensitive Personal Information

Some personal information we collect is defined under the law as sensitive personal information. Sensitive personal information we collect includes:

- Social Security number, driver’s license number, state identification card number, or passport number.
- Account log-in information
- Financial account numbers
- Precise geolocation information.
- Racial or ethnic origin, religious beliefs or union membership.
- Contents of mail, email, and text messages where we are not the intended recipient of the communication.
- Genetic data.
- Biometric information used for identification.
- Personal health information.
- Sexual orientation.

3. USE OF YOUR PERSONAL INFORMATION

SquareTrade collects and processes employee Personal information to establish, maintain, or terminate the employment relationship, including for the purpose of:

- Process an application for employment including determining eligibility or qualifications for employment, requesting a background check, and submitting a screening assessment,
- Identify, review and manage candidacy for job opportunities,
- Provide or administer wages, payments, and benefits,
- Management of travel, lodging, and related expenses,

- Conduct performance reviews, establish training requirements, and conduct investigations or pursue disciplinary actions or termination,
- Compile directories and establish contacts in the event of an emergency across the enterprise,
- Comply with legal requirements, assist in an investigation, comply with requests from regulatory and law enforcement authorities and meet contractual obligations,
- Communicate with you via email, mail or other methods about the company, benefits, wages, job opportunities, technology or services offered or other information relevant to employment status,
- Provide you with employment related equipment, tools, systems or applications including mobile applications for voluntary wellness programs,
- Analyze, improve or develop our employee-related processes, networks or tools using algorithms, analytics software, research studies, surveys, and other similar methods, monitoring employee usage of online tools,
- Protect the safety and security of our business, services, and Sites including to prevent suspected fraud, threats to our network or other illegal activities, prevent misuse or for any other reason permitted by law,
- Update or correct our records including combining information we have with information received from other sources, including publicly available databases,
- Carry out other activities required in the normal course of our employment relationship with you.

We use sensitive personal information only as reasonably necessary to perform or maintain the services or provide goods you requested, to perform services such as maintaining or servicing accounts, processing payments, to detect security incidents, resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for those actions, to ensure peoples' physical safety, to verify or maintain the quality or safety of service, improve, upgrade or enhance service, or other reasons that do not require an opt-out of this use.

4. RETAINING YOUR INFORMATION

We retain personal information in accordance with applicable laws or regulatory requirements and also for as long as necessary to fulfill the purposes for which it was collected and to fulfill the business or commercial purposes that are explained in this Privacy Statement.

5. SHARING YOUR INFORMATION

We do not sell your personal information. We may share your personal information with our affiliates for business purposes consistent with the uses described in this Privacy Statement. We may also share information about you with third parties whenever you consent to or direct such sharing. We strive to work with companies that share our commitment to privacy. We may also share information with others in an aggregated or de-identified form that does not reasonably identify you.

We may also share your personal information with third parties for business purposes or as required or permitted by law including with:

- **Service providers:** We may share personal information with service providers who perform services on our behalf for business purposes described above in “Use of Your Information” such as payroll support, tax and travel management services, health and safety and professional services such as accounting, legal counseling, IT, management consulting, and relocation services.
- **Benefits providers:** We may share your personal information with third parties who provide employee related benefits such as financial investment service providers, insurance providers, and childcare providers, to confirm your eligibility for these benefits.
- **Third parties in connection with a business transaction:** Personal information may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of any or all of our company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by an affiliate or third party, or in the event of a bankruptcy or related or similar proceedings.
- **Law enforcement, regulators and other parties for legal reasons:** Personal information may be disclosed to third parties, as required by law or subpoena, or if we reasonably believe such action is necessary to:
 - comply with the law and the reasonable requests of regulators, court orders, law enforcement or other public authorities, such as a subpoena, government audit or search warrant,
 - comply with a contract or as necessary to establish, exercise or defend against potential, threatened or actual litigation,
 - protect us, your vital interests, or those of another person, and
 - investigate fraud or to protect the security or integrity of our Sites, tools, facilities, or other individuals.

Depending on the circumstances, we may share any of the listed categories of personal information with the above categories of third parties.

6. YOUR PRIVACY RIGHTS AND CHOICES

As an employee, if you have any questions about the personal information SquareTrade has collected about you, or if you want to exercise your rights to access, correct, update, or delete such information or object, for legitimate purposes, to the processing of your personal information, as provided under applicable law, you should contact the People Team at HR@SquareTrade.com or via telephone at (857) 990-1634 > Press 0 for Operator > Leave a message.

You have the right to request deletion of personal information collected from you, subject to certain exceptions including that we need the personal information to:

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities,
- Comply with a legal obligation, or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

There may be cases where restrictions on the amount of information that can be disclosed to you apply under applicable legal (for example, if that would necessarily involve disclosing information about another person). SquareTrade is permitted to withhold some types of employee data in certain circumstances, subject to applicable law.

Non-Discrimination: We will not discriminate against you if you exercise any of the privacy rights described in this Privacy Statement.

Verification: To protect you and your personal information, we will only respond to privacy requests that we have been able to properly verify through our authentication processes. To verify your identity, you may be asked to provide personal information, which we only use to verify your identity or authority to make the request.

Authorized Agents: You may also make requests to know, access, review, delete or correct your personal information through an authorized agent if you give the agent signed permission to submit the request. If an authorized agent submits a request on your behalf, we may ask you to verify your identity and confirm that you provided the authorized agent permission to submit the request.

Update/Correct Personal information: It is important that the information contained in our records is both accurate and current. ADP is our system of record that stores your personal and job-related information. Current and former employees may view or modify their personal information stored in ADP, please visit <https://workforcenow.adp.com/> and click Myself > My Information > Profile. Please help us to keep your data accurate by informing us of any personal information change promptly.

7. SECURITY

The security of your personal information is important to us. We use a combination of reasonable technical, administrative, and physical safeguards to protect your personal information. However, no website, mobile application, database or system is completely secure or “hacker proof.” So, we cannot guarantee its absolute security. You are also responsible for taking reasonable steps to protect your personal information against unauthorized disclosure or misuse and to follow and implement all policies and practices to protect personal information collected by us.

We limit access to your personal information to those who need it to do their jobs. We comply with all applicable data security laws.

8. DATA TRANSFERS, STORAGE AND PROCESSING GLOBALLY

SquareTrade operates globally and may transfer your personal information to our affiliates or partners companies, service providers, or third parties in locations around the world for the purposes described in this Privacy Statement. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information.

For transfers of personal information (referred to as personal data under the General Data Protection Regulation, “GDPR”) outside of the United Kingdom (“UK”) and European Economic Area (“EEA”) our affiliates execute standard contractual clauses that have been approved by the European Commission in respect of transfers of personal data. Under the GDPR, SquareTrade and its affiliates act as joint controllers.

SquareTrade has certified to the EU-U.S. Privacy Shield. Please go to www.privacyshield.gov to view the Privacy Shield Notice. If there is any conflict between the policies in this Employee Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles will govern. For purposes of enforcing compliance with the Privacy Shield Principles, SquareTrade is subject to the investigatory and enforcement authority of the U.S. Federal Trade Commission.

9. SOCIAL MEDIA, LINKS AND EXTERNAL SITES

Links to other company’s websites may be provided on our websites as a convenience to you. If you choose to go to these external websites, you will be subject to the privacy practices of those external websites. We are not responsible for the privacy practices of those websites. We encourage you to be aware when you leave our website to read the privacy policies or statements of every third party’s website you visit, as those privacy policies or statements may differ from ours. Our Privacy Statement applies solely to the websites where this Privacy Statement appears.

10. CONTACT US

If you have any questions, comments, or concerns about your Personal information or about this Privacy Statement please contact Human Resources at HR@SquareTrade.com.

11. CHANGES TO OUR PRIVACY STATEMENT

We may periodically update or revise this Privacy Statement. The date at the top of this page shows when this Privacy Statement was last revised. We will let you know when we update the Privacy Statement by changing the date or other appropriate means.