

# Service Provider Privacy Statement

*This Privacy Statement was updated on May 13,2021.*

## Scope

Excelity Global, a wholly owned subsidiary of Ceridian HCM Holding, Inc. (herein “Excelity”), provides human capital management products and related services to organizations to help them manage their workforce. As such, Excelity processes data about those organizations’ prospective, current and past employees (herein “Employees” or “Individuals”) on behalf of those organizations and as per their instructions. This Privacy Statement (“Statement”) describes our general practices relating to the processing of data about these organizations’ Employees (“Personal Information”). If you are an Individual whose prospective, current or past employer (herein “Employer”) uses Excelity applications, and your Employer has asked you to submit Personal Information as part of that service, you should review your Employer’s own privacy statement to understand that Employer’s privacy practices.

## Personal Information Processing

In connection with Excelity products, Excelity will provide your Employer the ability to collect, store, use, transfer, share and disclose your Personal Information in support of a prospective, current or past employment relationship between you and your Employer. When Excelity processes your data in this manner, it acts as a processor for your Employer, who is the controller. In its capacity as a processor, Excelity only processes your Personal Information as per the instructions of the controller, for their benefit, and on their behalf. Therefore, Excelity’s customers- your Employer(s)- are responsible for providing you with a notice of what Personal Information they collect, use and disclose, for what purposes they do so, and with whom it is shared. They are also responsible for obtaining appropriate consent where required or identifying other legal basis upon which they may rely to process your Personal Information.

Excelity relies on its customers and its customers’ Employees to supply Excelity with accurate, complete and up-to-date Personal Information where relevant to Excelity’s delivery of the services. Individuals are asked to review their records on a regular basis and make the appropriate updates or notify their Employer of errors promptly. Excelity may share Personal Information with service providers to help us provide your Employer with a product or a service, and to other third parties (e.g. banks, government tax agencies, benefit providers) at the instructions of your Employer. In addition, Excelity may disclose Personal Information to law enforcement or other government authorities if required by law. In the event that Excelity, or any portion of our assets, are acquired, sold, or transferred, Excelity will disclose Personal Information with the company involved to complete the business transition, including at the negotiation stage.

Excelity processes Personal Information that your Employer may collect through the service from or about you, or that your Employer may provide through the service. For example:

- Personal details such as name, birth date, national ID number, marital status, signature, and image;
- Characteristics of protected classifications such as age, sex, physical or mental handicap;
- Contact details such as mailing address, telephone number, and email address;
- Financial information such as salary, bank account details, corporate card usage, and employment benefits;

- Performance information such as appraisals, performance reviews, disciplinary records, training records, details of skills and experience, and absence records;
- Information regarding your next of kin and other individuals such as emergency contacts, dependent information, and life insurance beneficiaries;
- Health-related information such as information regarding benefits programs, insurance, and sick leave;
- Photos and Face ID if you use Excelity mobile app;
- Application activity in Excelity's products through cookies, web beacons and server logs;
- Time related information by using time tracking app

## **Cross Border Transfers**

To run our business, we may store and process your Personal Information in any country where Excelity and authorized third parties operate. When we transfer your Personal Information in this manner across country borders, we implement adequate measures for its protection, and for compliance with applicable laws.

Excelity utilizes the adequacy determinations made by the European Commission to transfer Personal Information to countries with data protection that is adequate to the EU. Excelity utilizes Standard Contractual Clauses (SCCs) for the transfer of Personal Information from the EU and Switzerland to other countries.

## **Security**

Excelity has implemented policies and procedures to protect Personal Information. Excelity uses recognized industry standard security safeguards appropriate to the sensitivity of the Personal Information. Excelity reviews its security policies and procedures on a regular basis and updates them as needed to maintain their relevance. Excelity provides reasonable security controls for customers to configure in order to protect their Personal Information from and against risks, such as loss or theft, as well as unauthorized access, collection, use, disclosure, copying, modification, disposal and destruction.

## **Changes to this Privacy Statement**

Excelity may update this Statement periodically to reflect changes to our privacy practices. We will provide notice online when we make any material changes to this Statement.