



## EMPLOYEE PRIVACY NOTICE ON EMPLOYEE DATA PROCESSING

### United States (including California)

Last updated: November 2024

**NO PRIVACY: You have no expectation of privacy when you work on our premises, use any computer systems we own or connect to any networks we operate. Your actions and communications are observed, monitored, recorded, tracked, filtered, deleted, and otherwise processed for business and compliance purposes.**

Without limiting the generality of the foregoing, Arctic Wolf Networks, Inc. (“we” or “Arctic Wolf”) provides this notice to its United States employees, including its California employees (“*California Employees*”), with the inclusion of specific disclosures required by California Civil Code §1798.100, as amended by the California Privacy Rights Act, and the corresponding regulations from the California Attorney General (collectively, “CCPA”).

Employees may have, and California Employees are provided under CCPA, certain rights related to the information we collect from you:

- Knowledge of information collected;
- Deletion of the information collected;
- Opt-out of information collected;
- Opt-in of information collected;
- Correction of information collected;
- Go to court;
- Limit use of information;
- Not to be discriminated or retaliated against for exercising rights under the law.

**Where We Get Your Information From.** Arctic Wolf collects information about you from the following sources: 1) you; 2) prior employers, references, recruiters, job-related social media platforms; 3) third-party sources of demographic information; 4) third-party companies, such as background check companies; and 5) claim administrators and investigators. Depending on our interactions with you, we may or may not collect all of the information identified about you.

#### **Information Collected.**

*Personal Information:* We collect identifiers such as name, alias, mailing address, email address, phone number, other contact information, unique personal identifier, online identifier, Internet Protocol address, information related to your job, job profile, employee type, salary, benefits, compensation, your use of company equipment and resources, your communications, your performance, any disciplinary actions against you, and other information relating to you as an employee.

We may also monitor your access to our premises, which may provide Arctic Wolf with information about your attendance in the office, where you are seated on a given day, and your room booking selections.

*Sensitive Information:* We collect the following sensitive information:

- social security, driver’s license, passport, and other identification numbers and copies of documentation;
- signature;
- precise geolocation of devices assigned to you;
- information on racial or ethnic origin;
- bank account and other payment details;





- information relating to your health and health insurance;
- facial recognition, geolocation data, and other biometrics information related to our secured access points; and if voluntarily disclosed by you, gender, age, sexual orientation, gender identity, disability status, and military/veteran status.

Purposes of Processing. We use your personal information as reasonably necessary and proportionate for the following purposes:

- Administer the employment relationship, including monitoring job performance and daily activities, providing payments and benefits, including stock and equity administration;
- Operate, manage and maintain our business, including performance of accounting, audit, and other internal functions, such as internal investigations and workplace safety, including the physical safety of natural persons;
- Maintain the quality and/or security of our products and services delivered to our customers, including any improvements, upgrades, and enhancements thereof;
- Detect and prevent fraud and maintain security of our facilities and systems;
- Perform identity verification;
- Short-term, transient use;
- Retrieve lost or stolen devices and/or manage our information on such devices;
- Comply with the law, legal processes, and internal policies:
  - tax and immigration law requirements;
  - diversity and legal compliance monitoring to provide you accommodations, if requested by you, and benefits;
  - maintain records;
  - respond to legal requests for information and subpoenas;
  - government reporting activities;
  - export control requirements;
  - security and sanctions screenings; and
  - exercise and defend legal claims.
- Manage the physical security of our premises, manage our facilities, make decisions about the design of facilities, manage performance of individual employees and employees' compliance with Arctic Wolf's work-related policies; and
- Any other purposes authorized by Federal or State law applicable to the jurisdiction in which you are employed and specifically for California Employees, CCPA and the State of California.

We may or may not use personal information about you for each of the above purposes.

Selling of Personal Information. Arctic Wolf does not sell or share your personal information for cross context behavioral advertising.

Sharing of Personal Information. We process personal information with the help of our IT and security staff as well as external vendors and provide access to employees of other departments and outside third parties, including, but not limited to (i) employees in our HR, internal audit, compliance and legal departments; (ii) information technology service providers, and (iii) external advisors (law firms, auditors, etc.) or public authorities (for instance, in the course of investigations or mergers or acquisitions).

Retention. We retain your personal information in accordance with our [Information and Records Retention Policy](#) and any additional time periods necessary for compliance with law, exercise or defense of legal rights, and archiving, back-up and deletion processes.

Monitoring. We monitor electronic communications for purposes of quality control, training, and compliance with law and company policies. We use various technologies, systems and processes to monitor and safeguard employee compliance with applicable laws and company policies; to protect other employees, customers, suppliers and others; to protect trade secrets and intellectual property; to safeguard our premises; and to protect computer systems assigned to you, used by you for work, or owned by us, other employees or third parties, and which may contain or provide access to information pertaining to our business (collectively "Computer Systems").

Without limiting the generality of the foregoing, for illustration only, this may include:

*Processing of data:* we may store and process all types of data relating to your use of Computer Systems, including, but not limited to, your username, IP addresses, URLs of the websites you visit, emails exchanged through your company e-mail account and any



personal e-mail accounts you access from Computer Systems, contacts, calendars, and Internet usage generally to ensure network security and compliance monitoring.

*Tracking and Wiping:* We may track, locate and remotely wipe Computer Systems, including, but not limited to, in the event devices with company information are lost or stolen. This may affect devices you own and use for work purposes, as well as private information that you have stored on devices; you should regularly back-up data on devices in compliance with applicable company policies.

*Inform others of limited privacy:* Always make sure that everybody who you may be communicating with on Computer Systems – including co-workers, customers, suppliers, advisors, your friends, family, etc. - are also aware that if they are communicating with you through Computer Systems, their written and oral communications may be monitored, recorded, tracked, filtered and otherwise processed.

**This notice is not intended to create any rights for anyone except Arctic Wolf, or to limit Arctic Wolf's right to monitor, or qualify any other notices and/or consents, in any way.** For more information, please contact [Data Protection](#) or you may call +1 (888) 286-6726. Arctic Wolf's online Employee Privacy Notice (United States employees, including California Employees) can be found on the "Employee Privacy Notices" page within our internal policy repository. If you have a visual disability, please contact your HR department at [peopleexperience@arcticwolf.com](mailto:peopleexperience@arcticwolf.com) for accommodations.