California Consumer Privacy Act (CCPA) Data Protection and Data Privacy Statement

This protection and data privacy statement (this ***Statement***) has been developed by and is confidential to W R Systems, Ltd. and, its parents, and its subsidiaries (collectively, the ***Company***). It is intended for internal use only and should not be circulated outside of the Company.

1. Data Protection and Data Privacy

During the course of its activities, the Company will collect and use personal information of current, past and prospective employees, job applicants, officers, directors, owners, and contractors in their roles or former roles to the Company. The Company takes data protection and data privacy seriously and will treat this information in an appropriate and lawful manner. Data protection and data privacy protects a person's fundamental right to privacy, and every individual has rights with regard to how their personal information is collected and used.

In the State of California, the California Consumer Privacy Act (the **CCPA**) sets out how certain for-profit entities doing business in California may collect and process the personal data of California residents.

In applying for a job at the Company, or otherwise provided work or services for the Company, you may be asked to provide, or have provided certain information about yourself to the Company as part of the application, interview, or onboarding process. Collection of this information will occur only after this Statement is provided. This information is processed in accordance with the provisions of the Company's privacy policies.

Upon your commencement of employment or performance of services, and thereafter, the Company will process personal data about you. The Company is a business that collects the personal information of current, past, and prospective employees, job applicants, officers, directors, and owners, in their roles or former roles to the Company. As a business that collects the personal information of current, past and prospective employees, job applicants, officers, directors, owners, and contractors in their roles or former roles to the Company, the Company has a responsibility to establish practices and policies for the proper handling of personal data.

This Statement informs you of how the Company will collect and use your personal data in relation to your employment with the Company. It should be read in conjunction with related policies and procedures which the Company may put in place from time to time.

2. Personal Data

Personal data collected by the Company includes the following:

- Personal and household information, including name; contact information; date and place of birth; personal public service number; gender; education; signature; physical characteristics or description; and other background; civil status; bank account details; and any other information that is capable of being associated with, or may reasonably be linked, directly or indirectly, with a particular consumer or household;

- Information relating to your job, such as position/title; employee number; contact information; reporting lines; working hours; wages, benefits, compensation, expense and payroll details; other terms of your employment; job performance and related evaluative information; details of any applicable disciplinary action or investigation by the Company; details of any grievance raised by you and any resulting proceedings;
- Information provided to the Company by you, or about you, relating to you or members of your household and other dependents;
- Personal image or photograph of each employee for security badge pictures which will be used in other applications in the organization;
- Cell phone data for alerting and notification purposes if the employee chooses to opt-in to our notification service; and
- The processing of historical, residential, employment, family, and personal data in pursuit of federal background investigations when required. The Company may store that information during the investigation to facilitate the Personnel Clearance (PCL) process.

The contents of email communications using company email accounts, insofar as the communications relate solely to the business activity of the Company, shall not be deemed to be the personal data of the senders or recipients. Where the contents of such communications relate to an employee or employees of the Company (for example, in relation to a human resource matter), the communications shall be the personal data of the employee or employees in question.

3. Purposes

The purposes for which the Company collect and/or use personal information include but is not limited to the following:

- Meeting legal and regulatory obligations, such as in relation to taxes; health and safety obligations; employment protection legislation; equal opportunities monitoring; and immigration requirements;
- Maintaining and improving effective employee administration and otherwise complying with its contractual obligations and management reporting requirements, including personnel administration, allocating work, and administration of employee benefits and salary, expenses, IT or communications equipment, entertainment and internal and external employee directories;
- Training requirements and determining qualifications for specific assignments;
- Facilitating employee performance reviews and monitoring compliance with contractual obligations, and policies and procedures that may be put in place by the Company from time to time;
- Maintaining, improving, and monitoring security;
- Storing, preparing and maintaining health records and any medical reports (to monitor sick leave, review sick pay, administer benefits and make decisions as to your ability to work, with or without a reasonable accommodation);
- Gathering information required to carry out disciplinary and grievances hearings and internal investigations (including reports, which may be submitted anonymously, made through any whistle blowing procedure); and
- Due diligence or transfer in the event of a potential sale or investment in part or all of the Company, its business, assets or any part thereof.

4. Monitoring

The Company may monitor or record your use of the Company's communication systems and equipment (including telephone, mobile phone, voicemail, email, instant messenger, computer or other electronic systems). Any use by you of the Company's communication systems and equipment shall be regarded as work related, and, accordingly, there should not be any expectation of privacy when utilizing the Company's communication systems and equipment. Private communications should be conducted outside of working hours, away from the Company's premises and without using the Company's communication systems or equipment. CCTV cameras may also be in operation in the Company's office building(s) for safety and security purposes.

5. Third Parties

The Company may disclose or transfer, or has disclosed or transferred, personal data to:

- Third parties who provide a service to the Company, including auditors and outside professional advisers, IT or communications suppliers, medical practitioners, data security or storage providers, private health companies, pension providers, facilities and companies and other benefits providers.
- A public, legal or regulatory authority in the event that the Company is required to do so by applicable law, rule or regulation.
- A third party where the Company is under a duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property or safety of the Company, its customers or others.
- In the event that the Company may sell or buy any business or assets, a prospective seller or buyer of such business or assets.
- A third party where it is necessary to protect the vital interests of the data subject or another natural person.

Where these third parties process your personal data on the Company's behalf, the Company shall be the business that discloses employees' personal information for a business purpose and such third parties shall be the Service Provider as defined under the CCPA. In some cases, such as third parties in connection with health insurance or pensions, such third parties may need to process your data for their own independent legitimate purposes, and in such cases the third party shall also be a business that discloses employees' personal information for a business purpose in respect of this processing.

In addition, the Company may disclose your personal information to any group company, which includes its ultimate holding companies and their subsidiaries.

6. Job Applicants and References

We may ask you for the name, address, telephone number, and email address of person(s) whom you designate as personal or employment references. Do not disclose personal information about any person until you have notified the persons of your intention to disclose their personal information and the purpose of the designation. It is your responsibility to notify the persons you intend to designate for these purposes before disclosing their personal information to us.

7. Information about Dependents

If you provide the Company with data about members of your family and/or other dependents, such as information related to health and other benefits that they may obtain through your employment, it is your responsibility to obtain the consent of these individuals for the processing of their data.

8. Legal Basis

The Company will conduct the processing described in this Statement on the basis that it is strictly necessary for the purposes of legitimate purposes outlined in this Statement. The processing shall comply with the principles of proportionality and subsidiarity. Where any new processing of employee data is proposed, it will be subjected to a proportionality test to consider whether all data are necessary, whether this processing outweighs the general privacy rights of employees, and what measures must be taken to ensure that the impact on employees is limited to the minimum necessary.

9. Changes to this Statement

This Statement will be kept under review and may be changed from time to time to reflect any changes in the processing of employee personal data by the Company.

10. Comments or Questions

Comments or questions in relation to this Statement should be directed to Human Resources (HR). HR will take care to treat all such comments, suggestions and questions with appropriate discretion.