

# EMPLOYEE DATA PRIVACY POLICY

**Summit Digital Solutions, Inc.**

*Effective Date: January 1, 2024*

*Policy Number: HR-DP-2024-01*

*Version: 2.0*

## 1. PURPOSE AND SCOPE

1 Summit Digital Solutions, Inc. ("Company") is committed to protecting the privacy and security of employee personal data in accordance with applicable data protection laws and regulations.

2 This Policy applies to all current, former, and prospective employees, contractors, consultants, temporary workers, and other individuals who provide personal information to the Company in connection with their employment or engagement ("Personnel").

## 2. DEFINITIONS

1 "Personal Data" means any information relating to an identified or identifiable natural person, including but not limited to:

- Name, address, and contact information
- Government-issued identification numbers
- Financial information including banking details
- Employment history and qualifications
- Performance evaluations and disciplinary records
- Health and benefits information
- Biometric data used for access control systems

2 "Processing" means any operation performed on Personal Data, including collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, or erasure.

## 3. COLLECTION AND USE OF PERSONAL DATA

1 The Company collects and processes Personal Data for legitimate business purposes, including:

- Employment administration and personnel management

- Payroll and benefits administration
- Performance management and training
- Compliance with legal obligations
- Security and access control
- Business continuity planning
- IT systems and resource allocation

2 The Company will only collect Personal Data that is necessary and relevant for the intended purpose and will inform Personnel of the purposes for which their data is being collected.

#### **4. DATA PROTECTION MEASURES**

##### **1 Technical Safeguards**

- Encryption of sensitive Personal Data
- Access controls and authentication requirements
- Regular security updates and patch management
- Network security monitoring and intrusion detection
- Secure backup and recovery procedures

##### **2 Organizational Safeguards**

- Role-based access restrictions
- Employee training on data protection
- Data protection impact assessments
- Incident response procedures
- Regular compliance audits

#### **5. DATA RETENTION AND DISPOSAL**

1 Personal Data will be retained only as long as necessary for the purposes for which it was collected or as required by law, whichever is longer.

2 The Company maintains a data retention schedule specifying retention periods for different categories of Personal Data.

3 Secure disposal methods will be used for Personal Data that is no longer needed, including:

- Secure shredding of physical documents
- Certified destruction of electronic storage media
- Permanent deletion of electronic records

## **6. EMPLOYEE RIGHTS AND REQUESTS**

1 Personnel have the right to:

- Access their Personal Data
- Request corrections to inaccurate data
- Request deletion of data where appropriate
- Object to certain types of processing
- Receive a copy of their Personal Data
- File complaints regarding data handling

2 Requests should be submitted to the HR Department or Data Protection Officer at [privacy@summitdigital.com](mailto:privacy@summitdigital.com).

## **7. THIRD-PARTY DISCLOSURE**

1 Personal Data may be shared with third parties only:

- As required by law
- With service providers who need the data to perform contracted services
- With employee benefit providers
- In connection with corporate transactions
- With express employee consent

2 All third-party service providers must agree to appropriate data protection terms.

## **8. INTERNATIONAL DATA TRANSFERS**

1 Personal Data may be transferred internationally only where:

- Adequate data protection measures are in place
- Standard contractual clauses are implemented
- Transfer is necessary for contract performance
- Express consent has been obtained

## **9. COMPLIANCE AND ENFORCEMENT**

1 Violations of this Policy may result in disciplinary action up to and including termination of employment.

2 Questions about this Policy should be directed to:

Data Protection Officer

Summit Digital Solutions, Inc.

privacy@summitdigital.com

## **10. POLICY UPDATES**

1 This Policy will be reviewed annually and updated as necessary to reflect changes in law, business practices, or Company requirements.

2 Personnel will be notified of material changes to this Policy.

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*Last Updated: January 1, 2024*

*Approved by: Legal Department*

*Document Owner: Chief Privacy Officer*