

EMPLOYEE DATA PRIVACY POLICY

EMPLOYEE DATA PRIVACY POLICY

NaviFloor Robotics, Inc.

Effective Date: January 1, 2024

Policy Number: HR-DP-2024-01

Version: 2.0

1. PURPOSE AND SCOPE

-

1. NaviFloor Robotics, Inc. ("Company") is committed to protecting the privacy

-

2. This Policy applies to all current, former, and prospective employees, contractors,

2. DEFINITIONS

-

1. "Personal Information" means any information relating to an identified or identifiable

a) Name, address, telephone number, email address

b) Social security number, tax identification numbers

c) Banking and financial information

d) Employment history and performance records

e) Health and medical information

f) Biometric data used for facility access

g) System access credentials and authentication data

-

2. "Processing" means any operation performed on Personal Information, including:

3. COLLECTION AND USE OF PERSONAL INFORMATION

-

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

a) Payroll and benefits administration

b) Performance management and career development

c) Workplace safety and security

d) Compliance with legal obligations

e) System access and authentication

f) Robot operation training and certification records

g) Research and development team assignments

-

2. The Company limits the collection of Personal Information to what is necessary

4. DATA SECURITY MEASURES

-

1. The Company implements appropriate technical and organizational measures

a) Encryption of digital records

b) Access controls and authentication protocols

c) Regular security assessments and audits

d) Secure physical storage of paper records

e) Employee training on data protection

f) Incident response procedures

- - 4 -

2. Special security protocols apply to research and development data contain

5. DATA RETENTION AND DISPOSAL

-

1. Personal Information will be retained only as long as necessary for the pur

-

2. The Company maintains a data retention schedule specifying retention per

-

3. Secure disposal methods are used for both physical and electronic records

6. EMPLOYEE RIGHTS AND ACCESS

- - 5 -

1. Employees have the right to:

- a) Access their Personal Information
- b) Request corrections to inaccurate data
- c) Object to certain types of processing
- d) Request deletion of Personal Information where appropriate
- e) Receive a copy of their Personal Information

-

2. Requests should be submitted to the Human Resources Department using

7. THIRD-PARTY DISCLOSURE

-

1. Personal Information may be shared with third parties only:

- a) As required by law
- b) With service providers who need access to perform their functions
- c) In connection with corporate transactions
- d) With employee consent where required

-

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

8. INTERNATIONAL DATA TRANSFERS

-

1. Personal Information may be transferred to countries where the Company

-

2. International transfers comply with applicable cross-border data transfer r

9. POLICY COMPLIANCE AND ENFORCEMENT

-

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

-

2. Employees must report suspected privacy incidents to the Privacy Officer.

10. POLICY UPDATES

-

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

-

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

11. CONTACT INFORMATION

Privacy Officer: [privacy@navifloor.com]

Human Resources: [hr@navifloor.com]

Data Protection Office: Building 4, Suite 300

100 Innovation Drive

Dover, DE 19901

Last Updated: January 1, 2024

Approved By: Board of Directors

Document Owner: Legal Department

