



## Personnel Privacy Policy

### 1. INTRODUCTION

At Constant Contact, we respect personnel privacy and are committed to protecting the personal information we obtain and maintain from both current and prospective employees. We maintain this Personnel Privacy Policy in compliance with the California Consumer Privacy Act ("CCPA"). Constant Contact does not sell your personal information.

### 2. SCOPE

This policy applies only to applicants, employees, directors, officers, and independent contractors of Constant Contact, Inc. and its subsidiaries who are California residents ("Covered Personnel"). Constant Contact and its subsidiaries are referred to in this policy as "we", "our", or "Constant Contact".

This policy does not apply to personal information outside the scope of the CCPA, such as personal information that is collected or used in accordance with the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, the Fair Credit Reporting Act, the Confidentiality of Medical Information Act, or the Health Insurance Portability and Accountability Act ("HIPAA"). This policy also does not apply to information that is publicly available through government records.

### 3. COLLECTION OF PERSONAL INFORMATION

The below chart lists the categories of Covered Personnel personal information that Constant Contact may collect and has collected in the past 12 months, as permitted by applicable laws.

Categories of Personal Information	Categories of Services Providers and Third Parties with whom Personal Information is Shared
<b>Identifiers.</b> This may include name, home address, telephone number, date of birth, Social Security Number, driver's license number, passport number, internet protocol address, email address, or online identifier.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; Constant Contact's affiliates; Constant Contact's customers and prospective customers; prospective purchasers of our business; and outside auditors and lawyers.

Categories of Personal Information	Categories of Services Providers and Third Parties with whom Personal Information is Shared
<b>Protected classification information.</b> This may include residency and work permit status, race, gender, and ethnicity.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; and Constant Contact's affiliates.
<b>Professional or employment related information.</b> This may include date of hire, date(s) of promotion(s), work history, technical skills, educational background, professional certifications, licensing and registrations, language capabilities, training courses attended, records of work absences, salary history and expectations, performance appraisals, letters of appreciation and commendation, and disciplinary and grievance procedures.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; Constant Contact's affiliates; Constant Contact's customers and prospective customers; prospective purchasers of our business; and outside auditors and lawyers.
<b>Banking or financial details.</b> This may include your financial information which is necessary to pay you, such as the name of your bank and account routing information.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; and Constant Contact's affiliates.
<b>Benefits information.</b> This may include sick pay, pensions, and insurance related information.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; Constant Contact's affiliates; and outside auditors and lawyers.
<b>Employment eligibility information.</b> This may include the results of criminal background checks, the results of drug and alcohol testing, COVID-19 vaccination status, screening, health certifications, driving license number, vehicle registration, and driving history.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; and Constant Contact's affiliates.
<b>Legally required information.</b> This may include child support and debt payment information.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; and service providers.
<b>Inferences drawn about you based on other personal information you provide.</b> This may include your preferences, characteristics, behavior, attitudes, intelligence, and abilities.	Service providers and Constant Contact's affiliates.

<b>Categories of Personal Information</b>	<b>Categories of Services Providers and Third Parties with whom Personal Information is Shared</b>
<b>Automatically collected security information.</b> This may include information captured on security systems, including CCTV and key card entry systems.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; and Constant Contact's affiliates.
<b>Communications.</b> This may include voicemails, e-mails, correspondence and other work product and communications created, stored or transmitted by an employee using Constant Contact's computer or communications equipment.	Entities that Constant Contact is required to share with pursuant to law or for legal proceedings; service providers; Constant Contact's affiliates; and Constant Contact's customers and prospective customers.

#### 4. HOW CONSTANT CONTACT USES PERSONAL INFORMATION

Constant Contact may use Covered Personnel personal information in the following ways:

- To evaluate an application for employment;
- To conduct business (including serving our customers and marketing);
- To comply with legal obligations;
- For employee management and administration;
- For employment verification;
- To administer benefits;
- To develop and improve services and programs for employees;
- For fraud prevention or other internal investigations;
- To administer payroll;
- To address employee relations issues; or
- To maintain, monitor, and improve our information systems and networks.

#### 5. CONTACT

For questions or complaints regarding this Personnel Privacy Policy, please contact Human Resources.

#### 6. REVISION HISTORY

<b>Date</b>	<b>Version</b>	<b>Description</b>	<b>Author</b>	<b>Approver</b>
16 May 2022	1.0	Initial Publication	Anna Jarosinski, Senior Corporate Counsel	Mary Rusterholz, Chief People Officer; Lara Mataac, General Counsel