



Worker Personal Data Privacy and Protection Policy

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Data Protection Director::	
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I. Purpose

The purpose of this Mintz Group Global Worker Data Protection Policy (“**Policy**”) is to outline Mintz Group’s practices for the Processing of Worker Data on a worldwide basis. Unless it is otherwise Worker Data, this Policy does not apply to the Processing of information relating to Mintz Group Customers or online visitors.

This Policy is designed to provide a global minimum standard for Mintz Group with respect to its Processing of Worker Data. Where specific local laws require stricter standards than those prescribed in this Policy, Mintz Group will Process Worker Data in accordance with applicable local law and may develop specific local policies in this regard. Where applicable local law provides a lower level of protection of Worker Data than that established by this Policy, then the standard required by this Policy will apply.

II. Revision History

Date	Revision #	Modification
	0.1	Initial Draft
May 14, 2018	0.2	Final

III. Scope

This Policy applies to all Mintz Group Workers globally.

IV. Definitions

All defined terms contained herein shall have the meaning ascribed to them in the Data Protection Glossary unless otherwise defined herein.

V. Responsibilities

The Human Resources Information Systems (“**HRIS**”) Team is responsible for managing this Policy. The Mintz Group Data Protection Team is responsible for responding to any actual or potential violations of this Policy.

VI. Additional Documentation

Data Protection Glossary
DPIA Standard
DPIA Template
Data Classification Policy
Data Classification Standard
Enterprise Risk Assessment Standard
Access & Correction Standard
Personal Data Erasure Standard
Data Protection Training Standard
Data Protection Audit Standard
Consent Standard
Data Processing Register Standard
Individual Recourse Standard
Information Security Standards

VII. Policy

A. Processing of Worker Data

1. What is Processing?

In the course of its relationships with Mintz Group Workers, Mintz Group will Process Worker Data.

In addition to the general definition in the Data Protection Glossary, the term ‘**Processing**’ also means any action taken in connection with Worker Data, including: collection, handling, use, transfer and disclosure by transmission, dissemination or otherwise making available, as well as recording, organization, storage, retention, adaptation or alteration, access, retrieval, consultation, alignment or combination, blocking, anonymizing, erasure, disposal or destruction.

2. What Are Mintz Group’s General Processing Principles?

Mintz Group respects the privacy rights and interests of each Mintz Group Worker and adheres to the following general principles when Processing Worker Data:

- (a) Worker Data will be Processed fairly and lawfully and in accordance with this Policy.
- (b) Worker Data will be collected for legitimate purposes.
- (c) Before Mintz Group collects Worker Data, Mintz Group Workers will be informed about: the purposes for which their Worker Data is collected and used; how they can make inquiries or complaints about the Processing of their Worker Data; the types of third parties to which Mintz Group discloses their Worker Data; the means Mintz Group offers for limiting the use and disclosure of their Worker Data; and the security measures that Mintz Group adopts to safeguard their Worker Data.
- (d) Worker Data will be accurate and kept up-to-date. Reasonable steps will be taken to rectify or delete Worker Data that is inaccurate or incomplete.
- (e) Subject to certain exceptions, Mintz Group Workers will have the opportunity to choose not to have their Worker Data disclosed to a third party (other than those who are acting as agents for Mintz Group under its instructions) or used for a legitimate purpose which is incompatible with the original purpose for collection. Mintz Group Workers will be given a clear and conspicuous, readily available and affordable mechanism by which to exercise their choice.

- (f) Worker Data will be relevant to, and not excessive for, the purposes for which it is collected and used.
- (g) Subject to applicable local record retention laws and any other applicable legal requirements, Worker Data will be held by Mintz Group only as long as it is necessary for the purposes for which it was collected and Processed.
- (h) Mintz Group will not Transfer Worker Data to any third party unless the third party provides at least the same level of privacy protection as is required by this Policy.
- (i) Reasonable precautions will be taken to prevent: unauthorized or accidental destruction, alteration or disclosure of; accidental loss of; unauthorized access to; misuse of; unlawful Processing of; or damage to, Worker Data.

3. What are the Purposes of Processing?

Mintz Group collects and uses Worker Data in order to: select and administer its workforce; run its operations; and ensure the safety and protection of Mintz Group Workers and its resources, in the context of its relationship with Mintz Group Workers.

For example, the following is an illustrative, but not exhaustive, list of Mintz Group's business activities that require the Processing of Worker Data in the context of Mintz Group's relationships with Mintz Group Workers:

- (a) payroll, compensation and benefits administration;
- (b) business travel and Worker relocation administration;
- (c) Worker management and discipline;
- (d) Worker appraisal, and training and development;
- (e) Mintz Group facility, security and health and safety management;
- (f) staff recruitment;
- (g) tracking the engagement of Mintz Group contingent workers;
- (h) Mintz Group Worker identification;
- (i) reimbursement of Mintz Group Worker expenses;
- (j) compliance and risk management;
- (k) communication with Mintz Group Workers;
- (l) internal investigations;
- (m) internal technical and operational support;
- (n) business development and growth opportunities; or
- (o) compliance with applicable legal requirements.

B. Transfers of Worker Data

1. When Will Mintz Group Share Worker Data Amongst its Various Entities?

A Transfer of Worker Data between Mintz Group companies will only occur if the Transfer is based on a clear business need and is for the purposes described in Section 8.A.3. above.

2. What Worker Data Transfers Outside of Mintz Group May Be Made?

Mintz Group may, from time to time, Transfer Worker Data outside of Mintz Group:

- (a) where required as a matter of law (e.g., to tax and social security authorities);
- (b) where required to protect its legal rights (e.g., to defend litigation);
- (c) where required in an emergency where the health or security of a Mintz Group Worker is endangered (e.g., an accident at work);
- (d) at the direction of the relevant Mintz Group Worker;
- (e) to select third parties, where permitted by applicable local law; or
- (f) to select third parties, as described below.

3. Under What Circumstances May Disclosures Be Made to Service Providers and Customers?

Mintz Group may disclose Worker Data to select third parties:

- (a) that have been engaged to provide HR-related services to or on behalf of Mintz Group (e.g., the processing of Mintz Group's payroll) ('Service Providers'). In such circumstances, Mintz Group will only disclose Worker Data that is necessary for, and material, relevant and limited to, the Service Provider's provision of those HR-related services;
- (b) that obtain services from Mintz Group ('Customers') and that require specific information concerning the Mintz Group Workers involved in the provision of those services for the purposes of:
- (c) assessing the suitability of Mintz Group or the Mintz Group Worker to provide services to the Customer; or
- (d) the safety, security and the protection of the Customer's resources.
- (e) In such circumstances, Mintz Group will only disclose Worker Data that is necessary for, and material, relevant and limited to, those purposes; or
- (f) where otherwise permitted under applicable local law.

4. What Requirements Will Be Imposed on Service Providers and Customers?

Mintz Group will require that Service Providers and Customers undertake by written contract to guarantee at least the same levels of protection afforded under this Policy when Processing Mintz Group Workers' Worker Data.

C. Security and Confidentiality

Mintz Group is committed to taking appropriate technical, physical and organizational measures to protect Worker Data (including Sensitive Worker Data) against: unauthorized or accidental destruction, alteration or disclosure; accidental loss; unauthorized access; misuse; unlawful Processing; or damage.

These measures include equipment, application and information security, access security, and training of Mintz Group Workers who are required to Process other Mintz Group Workers' Worker Data about this Policy and the appropriate Processing of Worker Data.

The level of the relevant measures will reflect the risks and nature of the different types of Worker Data and will be reviewed and updated periodically consistent with Mintz Group's Information Security policies.

D. Sensitive Worker Data

1. How Will Mintz Group Treat Sensitive Worker Data?

Sensitive Worker Data may be Processed for the purposes set out above. Mintz Group will endeavor to limit the Processing of Sensitive Worker Data to that strictly necessary for the purposes for which it was collected.

A Mintz Group Worker's explicit Consent to the Processing of his/her Sensitive Worker Data will be obtained, except as otherwise allowed by law.

2. What Are Mintz Group Workers' Rights to Access Their Worker Data?

Any Mintz Group Worker may inquire as to the nature of his/her Worker Data held by Mintz Group. Mintz Group will endeavor to respond to an inquiry without excessive delay and within the time limits prescribed by applicable local law (if any) or otherwise within a reasonable time period.

A Mintz Group Worker wishing to access his/her Worker Data held by Mintz Group should contact his/her local HR representative or the Human Resources Information Systems team ("HRIS") at hristeam@mintzgroup.com or at telephone numbers +1 646-432-3596 or +1 646-432-3521.

In responding to a request for access, Mintz Group may request that the requesting Mintz Group Worker:

- (a) provide Mintz Group with sufficient information to allow it to confirm the Mintz Group Worker's identity;
- (b) in order to locate responsive information, to identify his/her concerns which led to or motivated the request; and
- (c) identify which Mintz Group companies the Mintz Group Worker interacted with and the nature of the Worker Data requested.

Mintz Group may, at its discretion and to the extent permitted to do so under applicable local law, require that a Mintz Group Worker pay its reasonable costs of providing access.

3. When Might Requests for Access to or to Amend Worker Data Be Refused?

Mintz Group may refuse a Mintz Group Worker's request for access to his/her Worker Data in certain circumstances. For example, depending on the circumstances of the request, access may not be provided where:

- (a) the burden or expense of providing access would be disproportionate to the risks to the requester;
- (b) the rights or interests of an individual other than the requester would be violated, such as where access would reveal another Mintz Group Worker's Worker Data;
- (c) access would reveal information which Mintz Group has taken steps to protect from disclosure, where disclosure would help a competitor in the market ('Confidential Commercial Information'), such as where Confidential Commercial Information cannot be readily separated from the Worker Data;
- (d) the execution or enforcement of the law, including prevention, investigation, or detection of offences or the right to a fair trial would be interfered with;
- (e) a Mintz Group internal investigation or grievance proceeding would be prejudiced;

- (f) any confidentiality that may be necessary: for limited periods in connection with Mintz Group Worker succession planning and corporate re-organizations; or in connection with monitoring, inspections or regulatory functions connected with sound economic or financial management, would be prejudiced;
- (g) a court or other authority of appropriate jurisdiction determines that Mintz Group is not required to provide access;
- (h) a legal or other professional privilege or obligation would be breached; or
- (i) there is no legal requirement for Mintz Group to provide such access, including because the local legal requirements for a valid data subject access request have not been met.

If a request for access or rectification is refused, the reason for the refusal will be communicated to the Mintz Group Worker. In this case the Mintz Group Worker affected may make use of the dispute resolution Processes described in 'Grievance Mechanism' below.

4. What Are Mintz Group Workers' Rights to Amend Their Worker Data?

If a Mintz Group Worker's Worker Data is inaccurate or incomplete, the Mintz Group Worker may request that his/her Worker Data be rectified.

E. Transfer of EEA Worker Data Outside of the EEA

Worker Data (including EEA Worker Data and Non-EEA Worker Data from jurisdictions with cross-border data transfer restrictions) is shared with Mintz Group companies around the world in accordance with applicable local law and/or under one or more inter-company agreements which safeguard the integrity of the Worker Data and the privacy rights of the Mintz Group Worker whom the Worker Data concerns.

F. Grievance Mechanism

If at any time a Mintz Group Worker believes that his/her Worker Data has been Processed in violation of this Policy, the Mintz Group Worker may report the concern to the Data Protection Team at dataprotectionteam@mintzgroup.com.

If a complaint of the nature described above concerns EEA Worker Data and the complaint remains unresolved after referral to the Data Protection Team, Mintz Group will cooperate with the EEA Data Protection Authorities and/or their representatives ('DPAs'), as appropriate, for investigation and resolution of the complaint.

If the DPAs take the view that Mintz Group needs to take more specific action to comply with the GDPR, Mintz Group will comply with the advice of the DPAs which may include:

- 1. reversing or correcting the effects of any non-compliance, insofar as is feasible;
- 2. ensuring that future EEA Worker Data Processing will be in conformity with the GDPR; and
- 3. where possible, ceasing the Processing of the relevant EEA Worker Data.

Mintz Group will provide the DPAs with written confirmation of the actions it has taken to comply with the advice of the DPAs.

VIII. Communication about this Policy

Mintz Group is committed to communicating this Policy and how it may be accessed to all current and new Mintz Group Workers. Mintz Group will make this Policy available on its internal website.

IX. Assessment Procedures

Mintz Group will monitor its compliance with this Policy on an ongoing basis. Mintz Group will periodically verify that this Policy continues to conform to and complies with the GDPR. A statement affirming successful completion of any such assessment will be signed by a corporate officer or other authorized representative of Mintz Group at least

once per year and made available upon request by a Mintz Group Worker or in the context of an investigation or complaint about compliance.

X. Policy Governance

This Policy supersedes and replaces any and all prior policies, guidelines, and practices, written and unwritten, regarding its subject matter. Subject to any applicable local law requirements, the Company reserves the right to change, replace, or cancel this Policy with or without notice at its sole discretion at any time.

Mintz Group is committed to ensuring that this Policy is observed by Mintz Group Workers. Mintz Group Workers must comply with this Policy. Non-compliance with this Policy may result in a Mintz Group Worker being subject to disciplinary sanctions, up to and including (where appropriate and lawful) termination of employment.

In some countries, violations of regulations designed to protect Worker Data may result in administrative sanctions, penalties, and/or claims for compensation and/or damages.

Compliance with this Policy may be verified through various methods, including internal and external audits.

XI. Resources

Workers should contact the HRIS Team at hristeam@mintzgroup.com with any questions about this Policy. Workers should contact the Data Protection Team at dataprotectionteam@mintzgroup.com with any concerns about possible violations of this Policy.