

## EMPLOYEE PRIVACY NOTICE

*Last updated: [December, 15, 2025]*

Privacy and transparency are important to Walter P. Moore and Associates, Inc. We created this Employee Privacy Notice, so you know how and when we collect, use, share and transfer Personal Information (defined below) as a result of, and in connection with your employment in the usual course of business.

When this Privacy Notice mentions "**WPM**", "**we**", "**us**" or "**our**", it refers to Walter P. Moore and Associates, Inc., and the applicable subsidiary mentioned below.

Our parent company, Walter P. Moore and Associates, Inc is joint controller of your Personal Information with the subsidiary, which employs you, as listed below. As joint controllers, Walter P. Moore and Associates, Inc and the relevant subsidiary are both responsible for how your Personal Information is collected and used.

<b>If you live in</b>	<b>then the controller of your Personal Information is</b>
the United Kingdom	Walter P Moore Limited

This Notice is provided in accordance with the California Consumer Privacy Act, the California Privacy Rights Act, the UK General Data Protection Regulation, the EU General Data Protection Regulation, and other applicable federal, state, and international laws.

This Privacy Notice should be read in conjunction with similar notices given to you, related to other WPM activities.

### WHAT IS PERSONAL INFORMATION?

**"Personal Information"** (also referred to as 'personal data') means any information relating to an identified or identifiable living individual. We may collect the following Personal Information about you in connection with your employment.

Please note that some broad categories below are marked 'YES' because a small amount of that Personal Information is collected.

<b>category</b>	<b>examples</b>	<b>collected</b>
<b>A. Identifiers.</b>	Real name, alias, postal address, prior addresses, unique personal identifier, online identifier, IP address, email address, account name, social security number, national insurance number, driver's license number, passport number, or other similar identifiers.	YES
<b>B. Personal Information categories listed in the California Customer Records statute (including Cal. Civ. Code § 1798.80(e)).</b>	Name, signature, Social Security number, National Insurance Number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card (or other national identity card / government-issued ID) number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, payroll information, tax withholding information, compensation and bonus data, equity	YES

category	examples	collected
	<p>stock grants, or any other financial information, medical information, or health insurance information.</p> <p>Some Personal Information included in this category may overlap with other categories.</p>	
<b>C. Sensitive Personal Information categories listed in the California Customer Records statute (including Cal. Civ. Code 1798.140(ae)).</b>	<p>Social Security number, National Insurance Number driver's license, state identification card (or other national identity card / government-issued ID), passport number, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to the account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, contents of mail, email, and text messages, genetic data, biometric information, health information or sexual orientation. Some personal information included in this category may overlap with other categories.</p>	YES
<b>D. Protected classification characteristics under California or federal law.</b>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	YES
<b>E. Commercial information.</b>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	NO
<b>F. Biometric information.</b>	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	NO
<b>G. Internet or other similar network activity.</b>	<p>Browsing history, search history, information on a consumer's interaction with a website, application, login data, IP addresses, device identifiers, usage and activity on corporate systems, security login, or advertisement.</p>	YES
<b>H. Geolocation data.</b>	<p>Physical location or movements.</p>	NO
<b>I. Sensory data.</b>	<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	NO
<b>J. Professional or employment-related information.</b>	<p>Current or past job history or performance evaluations.</p>	YES
<b>K. Non-public education information</b>	<p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as</p>	YES

category	examples	collected
(including per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	
<b>L. Inferences drawn from other personal information.</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES
<b>M. Benefits Related Information</b>	Health and safety information, including information regarding work injuries, disability accommodation, vaccination or testing status, beneficiary information, retirement information, fitness/weight loss habits, application for, participation in and purchasing habits regarding any Company-sponsored benefits programs, biometric testing information, insurance program information and any other information related to benefits provided, sought or available to an employee during his or her employment.	YES

#### WHAT HAPPENS IF YOU DO NOT PROVIDE CERTAIN PERSONAL INFORMATION?

If you do not provide us with certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

#### HOW WE USE YOUR PERSONAL INFORMATION

We will process Personal Information provided by you for the following purposes:

- Facilitating the employment relationship with WPM.
- Payroll and finance, including paying salary, reimbursing expenses and administering benefits.
- Maintaining employment records.
- Performance reviews and management of performance.
- Training, including recording audio/video communications within WPM and with third parties, delivering written, audio and video training material, and maintaining training records.
- Administering and maintaining group health insurance benefits, pension, 401K (if applicable) and other retirement plans and workplace pension scheme.
- Administrative purposes, including using your information in our day-to-day business operations, including managing meetings, internal communications, and data sharing within WPM or, where relevant, with our customers and service providers.
- Monitoring and promotion of equal opportunities, including the review of demographic breakdown and progression.
- Monitoring use of IT and communications in accordance with our IT, email and internet policy.
- Managing health and safety at work and reporting on incidents.

- Regulatory (for example disclosing tax data to the applicable regulator) and professional requirements.
- Complying with applicable law requiring prospective employers or employers to maintain certain records.
- Exercising our right to defend, respond or conduct legal proceedings.

In addition to the above, while we will not sell your Personal Information or Sensitive Personal Information, we may use, or disclose it for customary human resources, personnel, and our management purposes, including to facilitate the employment relationship with WPM, effectively process payroll, manage employee job performance, to comply with applicable state and federal law requiring prospective employers or employers to maintain certain records, and to administer and maintain group health insurance benefits, 401K and/or retirement plans. We will not collect additional categories of information or use the Personal Information or Sensitive Personal Information for materially different, unrelated, or incompatible purposes without providing notice.

We will retain Personal Information and Sensitive Personal Information only for as long as reasonably necessary for the above stated business purposes.

## **WHO WE SHARE YOUR PERSONAL INFORMATION WITH**

---

WPM does not sell any Personal Information including Personal Information and Sensitive Personal Information under CCPA to any outside organization. We only disclose or share your Personal Information including Personal Information and Sensitive Personal Information under CCPA to third parties as reasonably necessary to carry out the permitted uses described in this Privacy Notice.

We may disclose your Personal Information to members of our corporate group including, without limitation, for the following reasons: in order to run global processes, carry out groupwide reporting, or take decisions about hiring or promotion.

It may be necessary from time to time for us to disclose your Personal Information including Personal Information and Sensitive Personal Information under CCPA to third parties or agents, including without limitation to the following:

- Third parties or agents of clients to assist in the administration, processing and management of certain activities pertaining to past, current and prospective employees including: external reference agencies (such as employee vetting and screening agencies), email service providers, payroll, pension administration, benefits provision and administration, human resources services, performance management, training, expense management, IT systems suppliers and support, third parties assisting with equity compensation programs, travel and expense management service providers, and other service providers.
- Individuals or companies employed by us to carry out specific services, functions or consultancy work and other financial institutions.
- Relatives or legal representatives of past, current and prospective employees.
- Public, governmental and regulatory bodies to whom we are obliged or required to disclose information (this includes exchanging information with law enforcement agencies, regulators, or other similar government bodies to meet national security or law enforcement requirements).
- Courts and Court-appointed persons.
- Insurance companies and other health insurance providers or trade unions.

- Insurance or assurance companies.
- Legal and medical practitioners.
- Pension or 401(k) providers.
- Potential purchasers or bidders in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company.
- Other support service providers necessary to support the organization in the services listed.
- Any person to whom disclosure is necessary to enable us to protect the rights, property, or our safety of WPM, our clients, or other third parties, and to enforce our rights under this Notice or under any agreement with you. This includes exchanging information with other companies and organisations for the purposes of detecting and preventing fraud and cyber-crime.
- We may also share your Personal Information with your consent or at your direction.

We will inform you in advance if we intend to further process or disclose your Personal Information for a purpose other than the purposes set out above. We take all reasonable steps, as required by law, to ensure the safety, privacy and integrity of such data and information and, where appropriate, enter into contracts with such third parties to protect the privacy and integrity of such data and any information supplied.

## **SECURITY AND STORAGE**

---

Access to Personal Information (including Sensitive Personal Information) in both electronic and paper form is restricted to members of the HR Team and employees who have a legitimate and justifiable reason to view such Personal Information.

## **YOUR RIGHTS**

---

As an employee you will have certain rights with regard to your Personal Information. The rights that apply will depend on which country you are employed in. Below we have set out the rights that apply to US employees. If you are an EU/UK employee, please see the [EU and UK Employees](#) section of this Privacy Notice for rights that apply.

### **California Employee Rights**

If you are a California employee, effective January 1, 2023, you have the right to:

- know what Personal Information is being collected;
- request to access your Personal Information;
- know and limit what Sensitive Personal Information is sold or shared and to whom;
- request that we delete your Personal Information;
- request to correct inaccurate Personal Information;
- the right to opt out of automated decision-making technology; and
- The right to non-discrimination and non-retaliation for exercising your privacy rights.

To exercise these rights please contact [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com), using "California Privacy" in the subject line.

## **EU AND UK EMPLOYEES**

---

If you are an EU or UK employee, this section applies to you.

### **Your obligation to inform third parties**

If you are a UK or EU employee, you must inform your dependants, emergency contacts or other individuals whose information you provide to us about the content of this notice, and provide them with a copy of this notice and any relevant policies.

### **Legal grounds for processing**

If you are a UK or EU employee, we will only process your Personal Information for the purposes set out above, to the extent necessary:

- In order for your **contract** of employment to be performed.
- To comply with any **legal or regulatory obligations**. This includes using your Personal Information for: paying income taxes and social contributions; paying pensions (if applicable); compliance with audits and other government inspections; recording overtime, incidents, working conditions and legal files; and maintaining staff compliance with policies. That might also be the case if we have to answer to public authorities – for example, in the UK, HMRC or the Information Commissioner's Office (the UK data protection regulator).
- For our **legitimate business interest** in managing its business including legal, personnel, administrative and management purposes and for the prevention and detection of crime. For example, our legitimate business interests may include, but are not limited to, the following:
  - employee management, including compensation, benefits administration, travel and employee relocation administration and expenses, evaluation, leave, promotions, producing and delivering training and development, discipline, grievances and termination, providing references;
  - communicating with personnel regarding events, news, staff surveys, alerts or other items of interest;
  - conducting internal investigations into potential improper conduct, and pursuing or defending against legal claims;
  - promoting the health and safety of personnel where legally permitted or required, for instance in relation to workplace safety assessments;
  - operating, managing and protecting our network, IT and communications systems, and property, including to block dangerous websites, avoid introduction of malware and help prevent unauthorized disclosure or theft of data and intellectual property;
  - intra-group reports and financial planning such as budget, effectivity and cost efficiency of personnel planning, strategic planning and project management, managing and allocating company assets and human resources, managing business continuity;
  - compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting; and
  - managing mergers, acquisitions, sales, re-organisations or disposals and integration with purchaser.

Please note that where this basis applies, we will consider the risk to you as an individual as against the legitimate interest of the data controller.

- **With your consent**, if required. We do not need your consent if the relevant processing is based on one of legal grounds above. If we do require your consent for processing your Personal Information, we will explain what we are asking consent for and you may carefully consider if you would like to consent. It is not a condition of your contract with us that you agree to any request for consent from us and you may refuse to give your consent.
- **Vital interests**. As necessary in order to protect the vital interests of our personnel or of another natural person, such as in case of an emergency where the health or security of personnel is in danger, or to prevent or mitigate imminent physical harm to an individual.

### **Special Categories of Personal Information**

Certain Personal Information is regarded as “special category” and require higher levels of protection. We need to have further justification for collecting, storing and using this type of data. If we use any special category information about you, we may rely one or more of the legal grounds above, along with any additional requirements set out in applicable data protection and employment law.

If you are an EU/UK employee and we wish to process your special Personal Information for any other purpose, we will seek your explicit consent to do so. You have the right to withdraw your consent to that processing at any time. To exercise this right please make your request to [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com) and please use "EU/UK Privacy" in the subject line.

We only process such data for specific reasons, where necessary for carrying out our obligations and exercise our specific rights or those of an employee under employment law, or where the law otherwise allows us to do so. We may use your sensitive Personal Information in the following ways and on the following legal bases.

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, for carrying out obligations or specific rights with regard to employment, social security, national insurance and social protection laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to provide appropriate workplace adjustments or accommodate a disability or illness, to monitor and manage sickness absence, and to administer benefits, subject to appropriate confidentiality safeguards.
- We may use information related to any pension scheme if it is required in relation to employment, social security, national insurance, and social protection laws or otherwise in the public interest.
- We may use diversity-related Personal Information (such as gender, race or ethnicity) in order to comply with legal obligations and internal policies relating to diversity and anti-discrimination.

We will only process data relating to employees' criminal convictions or involvement in criminal proceedings when permitted by law, or where provided voluntarily by a job candidate.

Sometimes we may also need to use this type of information if it is necessary for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, where you have already made the information public, or for reasons of substantial public interest.



### **International transfers**

If you are a UK or EU employee, due to the global nature of our business, your Personal Information will be disclosed to WPM entities outside of the United Kingdom ("UK") or the European Economic Area ("EEA"), including in the United States. It may also be processed by our employees or suppliers operating outside the UK or EEA.

We provide adequate protection for the transfer of Personal Information to countries outside of the UK or the EEA, including relying on a country-wide [adequacy decision](#) (where a country offers substantially the same protection as UK and/or EU data protection laws, as applicable) or through a series of intercompany agreements based on the Standard Contractual Clauses authorized under applicable UK and EU law. You are entitled to obtain a copy of these agreements by contacting the Legal department using [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com) and please use "EU/UK Privacy" in the subject line.

### **Data retention**

If you are a UK or EU employee, we will retain Personal Information only for as long as reasonably necessary for the above stated business purposes (including for the purposes of satisfying any legal, accounting, or reporting requirements).

Your Personal Information (which may include your original application) will be stored for the duration of your employment, and a limited period of time after that. We may retain data to the extent necessary to enable us to comply with any legal obligations or for the exercise or defense of legal claims following termination of employment.

In some circumstances we may anonymise your Personal Information so that you are no longer identifiable, in which case we may use such information without further notice to you.

### **Employee rights**

If you are a UK or EU employee, you may have certain rights in relation to your Personal Information, such as to:

- Access a copy of your Personal Information held by us.
- Object to processing of your data where our legal basis for processing your data is our legitimate interests.
- Request correction of your Personal Information if it is inaccurate or incomplete.
- Request erasure of your Personal Information in certain circumstances.
- Restrict our use of your Personal Information in certain circumstances.
- Request that your provided Personal Information be moved to a third party.
- To withdraw consent (only if you have provided your consent and wish to withdraw it). If you withdraw your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal reason for continuing to use the data.

We may ask you for further information in order to confirm your identity before we provide the information requested or otherwise comply with your request.

Where lawfully permitted, we may deny or restrict fulfilment of your request in some cases, such as when the granting of access or correction rights will impose a burden on us to provide such access or correction that is disproportionate to the risk to your privacy, where access to your data places another



individual's privacy rights at risk, or the continued processing of your data is necessary to comply with a legal obligation or for the exercise or defense of legal claims.

WPM and the local subsidiary that employs you (if applicable) are both responsible as joint controllers for compliance with GDPR and this notice, and you may exercise the above rights by contacting us at [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com) and please use "EU/UK Privacy" in the subject line. They will respond as soon as practicable and no later than one month after receipt of your request. They may request proof of identification to verify your request.

### **Complaints**

If you have any concerns about our data processing practices, you have the right to lodge a complaint with a data protection supervisory authority.

- If you are employed by a UK entity, you have the right to lodge a complaint with the UK Information Commissioner's Office. You can visit their website at [www.ico.org.uk](http://www.ico.org.uk).
- If you are employed by an EU entity, you have the right to lodge a complaint with your [local data protection authority](#).

### **CONTACT INFORMATION**

---

If you wish to make requests regarding your personal information or should you have any questions about the contents of this Notice, please contact Human Resources at [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com).

- For California privacy requests, please use "California Privacy" in the subject line.
- For UK/EU privacy requests, please use "EU/UK Privacy" in the subject line.

### **UPDATES TO THIS NOTICE**

---

We will not collect additional categories of information or use the Personal Information for materially different, unrelated, or incompatible purposes without providing notice.

We may update this Privacy Notice from time to time and will post any changes on our company intranet. If we make any substantive changes, we will notify you through email, or via our company intranet.

This Notice was last updated at the date stated at the top of it.