

## Employee Privacy Policy

### 1. Purpose and Scope

Optoro, Inc. (“Optoro,” “we,” “us,” or “our”) has adopted this Privacy Policy to provide notice to our employees about how we treat and govern their Personal Information.

This Policy applies to all Optoro employees, agents, and representatives, including independent contractors, that provide services to Optoro and whose personal and sensitive information we maintain. This Policy applies to all Personal Information collected, maintained, transmitted, stored, retained, or otherwise used by Optoro regardless of the media on which that information is stored.

### 2. Information we Collect

All information Optoro collects from our employees, agents, and representatives is treated as Highly Sensitive and Confidential (“Sensitive”) Personal Information. Sensitive Information, such as Personally Identifiable Information, can uniquely identify individuals. If Sensitive Information is lost, compromised, accessed, or improperly disclosed, it may result in grave harm, embarrassment, inconvenience, or unfairness to an individual. Optoro may not have this information, but to the extent that it does, the information is considered Sensitive. Sensitive Personal Information includes, but is not limited to:

- Names
- Addresses
- Telephone Numbers
- Email Addresses
- Employee Identification Numbers
- Geolocation Data
- Personal, professional, and academic data collected in the employment application process
- Government-issued Identification numbers, including social security numbers, driver’s license numbers, or state-issued identification numbers.
- A financial account number or routing number, credit or debit card number, or other like information that would permit access to an individual’s financial account.
- Biometric, medical, health, or health insurance information.
- Personal characteristics such as gender, date of birth, ethnicity or race, marital status, political affiliation, sexual orientation, or religious affiliation.

### 3. How We Use Your Personal Information

Optoro uses your Personal and Sensitive Information for a number of employment related purposes. We collect your personal information to: assess your qualifications for a position with Optoro; communicate with you; facilitate employee onboarding should you accept a position with Optoro; provide services and benefits to you; and to comply with all applicable federal and state laws and regulations.

Furthermore, during and in connection with your employment at Optoro, we may photograph you or record your voice, performances, acts, and appearances. Optoro may use

your name, picture, photograph, or other reproduction of your likeness and sound for Optoro's business purposes.

#### 4. How we Collect Your Personal Information

Optoro collects Personal and Sensitive Personal Information where employees and candidates have provided consent and voluntarily shared such information. Your consent may be inferred from your actions, such as directly providing your Personal and Sensitive Information to Optoro. The information Optoro collects is limited to the extent that is required and necessary for Optoro to accomplish legitimate Company business or as necessary to comply with the law.

#### 5. Access to Your Personal Information Files

Personal and Sensitive Information collected by Optoro is maintained in employee personnel files, and in Optoro's HR and Accounting Systems, and are considered confidential and the property of Optoro. Managers and supervisors may only have access to relevant portions of personnel records as needed for legitimate business purposes, including but not limited to making employment decisions, and all in accordance with anti-discrimination laws. Individuals or organizations outside of Optoro may access employee files only by presenting written consent from the employee or a court order, except that representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to file information.

Employees are required to keep information and forms up to date regarding changes in name, addresses, telephone number, marital status, withholding exemption status (for income tax purposes), people to be notified in case of emergency or accident, and additions to families. Failure to report changes in this kind of information can affect an employee's tax withholding and health insurance benefit coverage.

Subject to applicable law and at Optoro's discretion, employees may have the right to see their personnel file upon request to the Talent & Culture department and to respond in writing with any concerns. Former employees may also have the right to request access to their personnel files so long as those files have not been destroyed in a manner consistent with Optoro's Records Management and Document Retention Policy. Representatives of current and former employees may also request access on behalf of an employee, provided that the representative is duly authorized to do so in writing by the employee whose files are being requested. Optoro may take reasonable steps to verify the identity of a current or former employee or the employee's representative to ensure that personnel information is only provided to authorized individuals. Personnel files are to be reviewed in the Talent & Culture department and may not be copied or taken outside the department.

#### 6. Who Has Access to Personal Information

Your Personal and Sensitive Information is stored with the Talent and Culture Team in a secure location. Your Personal and Sensitive Information will not be shared with other Optoro employees for any reason unless it relates to, and is necessary to perform, specific

job duties.

Optoro may share your information with Third Parties who perform certain operations on Optoro's behalf. Optoro requires these Third Parties to protect your information in a manner compatible with Optoro's policies. Your Personal and Sensitive Information will be used solely for Optoro's designated purposes and Third Parties are not authorized to disclose your information, unless approved by Optoro or to comply with certain legal requirements.

In the event Optoro is required by law or legal processes, we may disclose your Personal and Sensitive Information to the appropriate authorities.

If you would like to know who has access to your personal information and the purposes for such use, you may contact Optoro's Legal Department at [generalcounsel@optoro.com](mailto:generalcounsel@optoro.com).

7. Rights of Data Subjects Under the EU General Data Protection Regulation (GDPR)  
Optoro employees who reside in the European Union have a number of rights related to their Personal and Sensitive Information under GDPR. Those rights include:

- The right to be informed
- The right of access
- The right to rectification of incorrect or incomplete information
- The right to erasure, also known as the right to be forgotten, in certain circumstances
- The right to restrict data processing
- The right to data portability
- The right to object to certain kinds of data processing
- The right not to be subject to automated decision-making and profiling

If you would like to exercise any of these rights, please contact [generalcounsel@optoro.com](mailto:generalcounsel@optoro.com) or at Attn: General Counsel, 1001 G Street NW, Suite 1200, Washington, D.C. 20001.

8. Information Security

Optoro has put in place technical, administrative, and physical safeguards for the protection of your Personal and Sensitive Information. All personal and sensitive information is stored in a safe, secure, and accessible manner. If you have questions about the security of your personal information, contact [generalcounsel@optoro.com](mailto:generalcounsel@optoro.com).

9. Data Retention

Federal and State law require Optoro to retain certain records, usually for a specific amount of time. Upon your employment or separation from employment with Optoro, your Personal and Sensitive Information shall be retained and destroyed consistent with the schedules and procedures provided for in Optoro's Records Management and Document Retention Policy.

#### 10. Changes to This Policy

This Policy may be reviewed and updated periodically to ensure compliance with changing data privacy laws in the United States and other countries. In the event that we update this Policy, you will receive notification of such changes to your Optoro email.

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