

Workforce Notice About Your Personal Information

1. Overview

This Notice explains your rights under the California Consumer Privacy Act of 2018 (“CCPA”) (Cal. Civ. Code § 1798.100 *et seq.*) and helps you understand how Sennheiser Electronic Corporation (“Sennheiser”) collects, stores, uses, shares, and secures your personal information in compliance with the CCPA. In this Notice, the terms “company,” “us,” “we,” and “our” refer to Sennheiser and its affiliates and subsidiaries.

2. Who This Notice Applies To

The CCPA provides rights to individuals who provide services to the company, including current and former employees; owners/directors/officers; or contractors (“Workforce” or “you”).

Additionally, the CCPA protects the personal information you provide Sennheiser on other individuals, like an emergency contact’s personal information and the personal information that is necessary to administer benefits to your dependent(s) and spouse.

3. What We Collect and Why

As further described in the table below, the company collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with our Workforce (“Personal Information”). Personal Information **does not** include publicly available information from government records, deidentified information, or aggregated information.

In addition, Personal Information does not include information that is created based on activities performed on company assets. **You do not have an expectation of privacy or rights under the CCPA** with respect to the following:

- (1) Information created, collected, or maintained on any technology assets owned, leased, or operated in whole, or in part, by the company. Sennheiser’s technology assets consist of all electronic devices, software, and means of electronic communication, including but not limited to, computers and workstations, laptop computers, computer hardware, as well as computer software applications, associated files, and data that grant access to services like the Internet, email, phone, voicemail, and instant messages. All information created, collected, or maintained by the company’s technology assets are company property and provided to you solely for your use in conducting company business.
- (2) The information Sennheiser collects when monitoring premises, equipment, devices, computers, network, applications, software, or similar company assets and resources, for the purpose of protecting its worksites, employees, and computer systems.

The following chart details the purposes for which we collected Personal Information in the last twelve (12) months, and the categories of information we collected for each purpose. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different purposes without first providing you notice.

Personal Information Sennheiser Collected

Recruiting, Hiring, Onboarding, Termination, Or Resignation

- Identifiers such as name, date of birth, address, phone number, email address, social security number, and driver's license number
- Characteristics of protected classifications under California or federal law such as race, sex, and marital status
- Professional or employment-related information such as employment history, employee identification number, hire date, and termination date
- Education information and history for background check purposes
- Emergency contact information

HR Benefits Management

- Identifiers such as name, date of birth, address, phone number, and email address
- Characteristics of protected classifications under California or federal law such as sex and marital status
- Professional or employment-related information such as hire date and termination date
- Health insurance information such as insurance policy information if you waive Sennheiser insurance coverage
- Dependent or spouse information for purposes of administering benefits

Wage And Payroll Processing

- Identifiers such as name, date of birth, address, phone number, email address, social security number, and driver's license number
- Characteristics of protected classifications under California or federal law such as marital status
- Professional or employment-related information such as hire date or termination data
- Financial information such as bank account information for direct deposit purposes

Evaluating Leave and Accommodation Requests

- Identifiers such as name, date of birth, address, phone number, email address, and social security number
- Medical information such as physical or mental disability

Training, Performance Reviews, and Goals Monitoring

- Identifiers such as name, date of birth, address, phone number, and email address
- Professional or employment-related information such as hire date and training records
- Education information such as personally identifiable education records that are not publicly available under the Family Education Rights and Privacy Act

Internal Investigations and Auditing

- Identifiers such as name, date of birth, address, phone number, and email address
- Professional or employment-related information such as employee identification number, hire date, termination date, wage, and time-keeping information

Network and Systems Security on Non-Company Owned Technology Assets

- Identifiers such as name and email address
- Internet or network activity information such as browsing history, search history, and information regarding your interactions with websites

Business Operations, Expenses, and Device Management

- Identifiers such as name, date of birth, address, phone number, and email address

- Financial information like bank account number for direct deposit purposes
- Professional or employment information such as employee identification number

Government Reporting

- Identifiers such as name or date of birth
- Characteristics of protected classifications under California or federal law such as race, sex, or marital status
- Financial information such as wage or tax information

4. Where We Get Your Personal Information From

We collect your Personal Information from the following sources:

- **You:** Primarily, we collect Personal Information directly from you. For example, during the application or onboarding processes.
- **Third parties:** When we collect your Personal Information from third parties, it is because you have provided consent either to us or to the third party. To the extent you use third-party websites, the sites may be governed by separate terms of use and privacy policies, which are not under our control and are not subject to this Notice. Please contact the third parties for questions regarding their privacy practices, as well as to exercise your rights.

5. When We Share Your Personal Information

Sennheiser does not and will not sell your Personal Information to third parties. Sennheiser may disclose your Personal Information to businesses and service providers in connection with providing the benefits and services the company offers its employees. For example, Sennheiser may share your Personal Information with applications and services, including:

- Human Resources information systems that help us manage employee data;
- Third party administrators that administer employee benefits;
- Financial advising, insurance, and retirement companies;
- Payroll processors and accounting systems; and
- Employee assistance programs.

6. Rights To Request Under CCPA Effective January 1, 2021

You do not currently have the right to make requests under CCPA until January 1, 2021. Effective January 1, 2021, you may have the right to make requests about your Personal Information. Sennheiser will inform you about any policies and procedures related to such rights if/when they become available. Other rights to inspect and access certain payroll and employment records remain available pursuant to the Labor Code.

7. How We Retain Your Personal Information

To the extent permitted by applicable law, Sennheiser will retain your Personal Information only for as long as the company believes it is necessary to fulfill the purposes for which it was collected, including for the purpose of meeting any legal, accounting, or other reporting requirements or obligations.

8. How You Are Protected Against Discrimination

Sennheiser will not unlawfully discriminate against you for exercising any of your rights under the CCPA. This commitment applies to all persons involved in Sennheiser operations and prohibits unlawful discrimination by any employee of Sennheiser, including supervisors and coworkers.

9. How Other Sennheiser Policies & Disclosures Apply

This Notice is in addition to the policies and disclosures found in the Employee Handbook. If you are unsure whether this Notice applies to you, please contact Human Resources.

10. Disclaimer

Nothing in this Notice restricts Sennheiser's ability to:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law; or
- Exercise or defend legal claims.

11. Changes to this Notice

This Notice is reviewed and updated annually to ensure it accurately captures our practices and procedures.

12. Resolving Concerns and How to Contact Us

If you have questions or concerns regarding this Notice or the handling of your Personal Information, please contact Laura.Minegar@sennheiser.com or call 860-598-7481.

Effective 2.26.2020