



## Employee Privacy Policy

Last updated: 22 April 2025

Naviga Inc. and its affiliates and subsidiaries (collectively, “**Naviga**” or “**we**”) respect your privacy. This Employee Privacy Policy (“**Policy**”) describes how Naviga collects, uses, discloses, stores and otherwise processes Personal Information through the recruitment process and during your employment.

This Policy is linked to the general privacy policy, which can be accessed via the following link: <https://www.navigaglobal.com/privacy-policy/>.

### 1. Definitions and roles

“**Personal Information**” (or “Personal Data”) is information that identifies you as an individual or relates to an identifiable individual, including but not limited to, name, title, job function, postal address, telephone number and/or email address.

“**Data controller**” is the party that determines the purposes for which (why) and the means by which (how) Personal Information is processed. Naviga, in particular the relevant affiliate or subsidiary identified in your employment contract or job description, is the Data controller.

“**Processing**” refers to any operation or set of operations performed on Personal Information. This includes activities such as collection, recording, organization, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction or erasure of Personal Information.

### 2. What Types of Personal Information does Naviga collect about its applicants/potential employees, contractors, and/or contingent workers?

Naviga collects Personal Information necessary to identify potential candidates for employment such as: (i) contact information; (ii) employment application data; (iii) previous employment, education and certification; (iv) when applicable, professional social media public profile data on professional sites (e.g., LinkedIn); (v) when applicable, data from careers site (e.g., website statistics) and (vi) information you provide to Naviga during an interview.

We also collect Personal Information necessary to make employment decisions and onboard new employees such as: (i) information required by federal, state, or country laws to enable compliance with legal requirements; (ii) results of medical evaluations (only where required by law or where necessary for the job role); (iii) results of background checks and (iv) when applicable, candidate survey feedback.

### 3. How does Naviga collect Personal Information?

We may collect Personal Information in a variety of ways, including: (i) websites, when you contact us, or send us an application; (ii) offline, when you attend one of Naviga's events, during phone calls or when you contact Naviga; and (iii) other sources, if applicable (e.g., interacting with public databases, previous employers or recruitment agencies).

### 4. How does Naviga process Personal Information and what are the legal basis of the processing activities?

We may use Personal Information: a) to respond to your inquiries and applications; b) to manage the recruitment process; c) if applicable, to manage your employment; d) for our business purposes, such as audits, fraud monitoring and prevention; e) to comply with legal requirements, including but not limited to responding to requests from public and government authorities; f) to protect our operations, rights and systems; g) to organize events and other activities (voluntary).

The legal basis for the processing of Personal Information is the performance of the contractual relationship between you and Naviga or the completion of the steps necessary to enter into a contract with you (a, b, c), our legitimate interest (d, f) the respect of the applicable legal obligation (e) and, when applicable, your consent (g).

Please note that providing your Personal Information is essential for entering into an employment relationship with Naviga. If the Personal Information is not provided, Naviga will be unable to complete the recruitment process or manage your employment.

In addition, please note that Naviga does not use an automated decision-making process while processing your Personal Information for the purposes mentioned above.

### 5. How will Naviga share Personal Information it receives?

We may disclose Personal Information to our subsidiaries and affiliates as well as we to our partners to achieve the purposes described in section 4 of this Policy. For example, some of our partners may perform background checks and co-sponsor events. In addition, we may disclose Personal Information to respond to lawful requests by public authorities.

Finally, Naviga may disclose Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

### 6. How does Naviga secure Personal Information about me?

Naviga has implemented organizational and technical measures to protect Personal Information, including security controls to prevent unauthorized access to its systems. While we take reasonable steps to secure your Personal Information from loss, unauthorized access or use,



modification and disclosure, you should be aware no security procedures are ever guaranteed to be one hundred percent secure from intrusion or hacking. If you have reason to believe that your interaction with Naviga is no longer secure (for example, if you feel that the security of your account has been compromised), please contact Naviga immediately.

#### 7. How can I access, correct, amend or remove my Personal Information?

Individuals have the right to access their Personal Information. If you would like to access, correct, amend, remove or limit the use of any Personal Information about you, when applicable, please notify Naviga at [privacy@navigaglobal.com](mailto:privacy@navigaglobal.com) so that we can evaluate and respond to your request in accordance with applicable law.

#### 8. How long will Naviga retain my Personal Information?

We take steps to ensure the Personal Information we process is retained for only as long as it is necessary and for the purpose for which it was collected (e.g., recruitment and employment management), unless we have to store to comply with a legal requirement or to protect our rights. Naviga retains CVs for a maximum period of 24 months, after which they are securely deleted. For more information about Naviga's retention periods please contact: [privacy@navigaglobal.com](mailto:privacy@navigaglobal.com).

#### 9. International transfer of data

Your Personal Information may be processed in any country where we have facilities or in which we engage service providers or where required under applicable law. We ensure that transfers outside of the EEA are subject to adequate protection, for example relying on adequacy decision of the European Commission. If you would like to receive more information about the safeguards in place, please contact: [privacy@navigaglobal.com](mailto:privacy@navigaglobal.com).

#### 10. GDPR rights


You have certain rights under the General Data Protection Regulation 2016/679 ("GDPR"). These include: the right to object to or restrict the processing of your Personal Information for certain purposes, the right to access your Personal Information, the right to delete your Personal information (if applicable), the right to receive a copy of your Personal Information and the right to withdraw your consent without affecting the lawfulness of processing based on consent before its withdrawal. To exercise your rights under the GDPR, please contact Naviga as specified in the "How to contact us" section below.

You also have the right to complain to a data protection authority if you think we have processed your Personal Information unlawfully. If you have such concerns, we invite you to contact us in the first instance at [privacy@navigaglobal.com](mailto:privacy@navigaglobal.com) to promptly address any concerns.

#### 11. California Consumer Privacy Act ("CCPA")

If you are a California resident, this section applies to you. The CCPA requires that we provide transparency about any Personal Information we "sell," which broadly means scenarios in which





Naviga has shared Personal Information with third parties in exchange for valuable consideration. Naviga does not sell Personal Information in this context.

## 12. Changes to this Policy

Naviga may amend this Policy from time to time. Any changes to this Policy will become effective when we post the revised Policy on the Policy Hub.

## 13. Data Protection Officer

Naviga has appointed a Group Data Protection Officer (“**DPO**”) you can contact the DPO via email at: [privacy@navigaglobal.com](mailto:privacy@navigaglobal.com).

## 14. How to contact Naviga

Your privacy is important to Naviga. If you have any questions, concerns, or complaints regarding the way we collect and handle your information, please contact Naviga by email at [privacy@navigaglobal.com](mailto:privacy@navigaglobal.com).

You may also contact us by mail as follows:

Within the United States: Naviga Inc., 701 Carlson Parkway, Suite 350, Minnetonka, MN 55305 USA

Outside the United States: Zinio Inc., Avenida Diagonal 605, 8ª planta 08028, Barcelona, Spain