

BILL GOSLING
OUTSOURCING

BILL GOSLING OUTSOURCING PRIVACY POLICY - Costa Rica

This policy explains what personal information we collect and store about you, how we collect it, and how we use and may share information about you before, during and after your employment with us. The policy also explains the nature, purposes of the database and treatment to be given to such data. We are required to notify you of this information under the Data Privacy Law (in Spanish, Ley de Protección de la Persona frente al Tratamiento de sus Datos Personales).

Who collects the information?

Bill Gosling Outsourcing gathers, uses and stores your personal and sensitive information for legally permitted reasons. For the purpose of ensuring that we are 100% compliant with the company and our clients' standards, Bill Gosling performs a background check exercise from the information collected upon job application and will be shared to our third party background check vendor. Completion and clearance from our background check process is a pre-requisite before you start your employment.

What are the information we collect?

We will collect the following personal and sensitive information during and after your employment if deemed necessary;

Pre-Employment:

- Your name, contact details (address, home and mobile phone numbers, email address) and emergency contacts (name, relationship and home and mobile phone numbers);



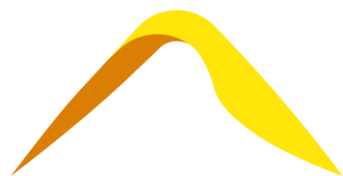
BILL GOSLING

OUTSOURCING

- Previous employment details and supporting documents including their most updated contact details
- Details of your salary and benefits, bank information (for payroll purposes), National ID document and your age;
- Details of your spouse/partner and any dependents (if applicable, for benefit enrollment and emergency contact details)
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information (for statutory compliance on employee's right to work)
- A copy of your Identification Cards submitted to us;
- Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health);
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs (optional)
- Criminal, credit and all other background check piece requirement

Post-Employment:

- Information on conduct and/or other disciplinary issues involving you;
- Details of your appraisals and performance reviews;
- Details of your performance management/improvement plans (if any);
- Details of your time and attendance records;
- Information regarding your work output;
- Information in applications you make for other positions within our organization;
- Information about your use of our IT, communication and other systems, and other monitoring information;
- Details of your use of business-related social media; Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organization; you will be notified separately if this is to occur);
- Your photograph for company publicity both internal and external marketing/corporate literature;



BILL GOSLING

OUTSOURCING

- Call recording
- Salaries reported to governmental entities such as CCSS and INS.
- Information related to labor accident reports to INS.
- Medical insurance usage.

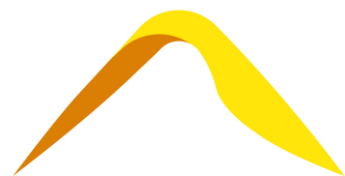
Why we collect the information and how we use it:

We collect and use this information for the following purposes:

- For the performance of a contract with you, or to take steps to enter into a contract;
- For complaint investigation and/or litigation filed against our organization;
- For compliance with a legal obligation (our obligations to you as your employer under employment law, health and safety law); and for the purposes of our legitimate interests or those of a third party, but only if these are not overridden by your interests, rights or freedoms. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

How we collect the information:

We will collect this information from your application document (physical document and through our recruitment platform), your personnel records, your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators, other employees, consultants and other professionals we may use to advise us generally and/or in relation to any conduct appraisal or performance review procedure, automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, trading platforms, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records.



BILL GOSLING
OUTSOURCING

How we share the information:

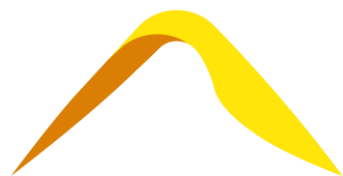
We also need to share some of the above categories of personal information with other parties, such as an independent third party background check vendor, client audits, external auditors, and external contractors, local government offices for compliance and our professional advisers and with potential purchasers of some or all of our business or on a re-structuring. Usually, information will be made anonymous, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also use your contact information such as email and/or telephone numbers as part of our business contingency planning processes. We may also need to share your information with our offices located in other regions. You have the right to object or withhold consent to processing your personal and sensitive information in limited circumstances.

Where information may be held:

Information may be held at our offices and those of our group companies through our HR system Workday, and third party agencies, service providers and representatives as described above. Information may be transferred internationally through our HR system. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

How long we keep your information:

We keep your information during your employment and archived for as long as necessary for the purposes of which the personal information is collected in accordance with our internal policies in compliance with the application regional legislation.



BILL GOSLING
OUTSOURCING

Your rights to be Informed, Object, Access, Rectification, Erasure or Blocking and Damages:

Please contact us if you would like to correct or request access to information that we hold relating to you or if you have any questions about this policy. You also have the right to ask us for some but not all of the information we hold and process to be erased in certain circumstances. If you wish to do so, please contact CostaRicaHR@billgosling.com.

Keeping your personal information secured:

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to Make a Privacy Related Inquiry to Bill Gosling Outsourcing:

We hope that we can resolve any query or concern you raise about our use of your information. To make a privacy related inquiry, please contact our HR Department through email at CostaRicaHR@billgosling.com

Electronic documents must be digitally signed and in PDF format (if practicable).