

Piper Sandler

European Personnel Privacy Policy

(A) This Policy

This Policy is provided by Piper Sandler Companies and its Affiliates (“**Piper Sandler**”, “**we**” or “**us**”), and is addressed to our current, former and prospective directors, officers, consultants, employees, temporary staff, individual contractors, interns, secondees and other personnel subject to the General Data Protection Regulation (“GDPR”) on data protection and privacy in the European Union (“EU”) and the European Economic Area (“EEA”) (together, “**Personnel**” or “**you**”). Defined terms used in this Policy are explained in Section (L) below.

For the purposes of this Policy, the Controller is the Piper Sandler Affiliate that you have applied to, has employed you or has engaged your services.

Piper Sandler may revise this Policy by posting an updated version on Piper Sandler’s intranet (the Trading Post). The updated Policy will be effective upon posting.

(B) Processing your Personal Data

Collection of Personal Data: We may collect your Personal Data from the following sources:

- Where you are an applicant for a position within Piper Sandler, we may, with your prior express written consent, conduct background checks, in accordance with the protections provided by applicable law or regulation.
- We may obtain your Personal Data when you provide it to us.
- We may collect your Personal Data in the ordinary course of your work relationship with us, or work for us (e.g., when we on-board you as a new member of our Personnel; when we Process your Personal Data for payroll purposes; and when you use our IT systems).
- We may collect Personal Data that you manifestly choose to make public, including via social media (to the extent that you choose to make your profile publicly visible).
- We may receive your Personal Data from third parties who provide it to us (e.g., past employers; referees; and law enforcement agencies).

Creation of Personal Data: We may also create Personal Data about you, such as your job title, compensation details and performance reviews. This Personal Data helps us to conduct our operations and manage our workforce. If you do not provide certain Personal Data, we may not be able to achieve some of the aims outlined in this Policy.

Relevant Personal Data: The categories of Personal Data about you that we Process are:

- Personal details: given name(s); preferred name; gender; date of birth / age; nationality; photograph; marital, civil partnership, domestic partner or civil union status; military status; disability status (where applicable); job title; employer Affiliate; department; employee identification number; salary and compensation details; national identification number or other identity documents; passport and/or travel visa numbers (where applicable); work authorization number (where applicable); and details of dependents and family members.
- Contact details: home address; work address; home telephone number; work telephone number; work mobile number; personal mobile telephone number; personal email address; work email address; network ID; and emergency contact details.
- Internal communication records: information concerning the use of, and Personal Data transmitted through, internal IT systems (e.g., emails, telephone records); and work-related social media profiles.
- Compensation details: salary and benefits; hourly rate (where applicable); target commission; bonus type; stock awards; eligibility for bonus and/or long-term income; pension details; pay data; bank account information; tax code; and national insurance number; and travel expenses information.

- Employment records: employment percentage (full or part-time); original hire date; most recent hire date; probation end date; separation date(s); Personnel group/subgroup; supervisor name; organizational unit name; job level; promotions; working hours; vacation and leave data, absence and attendance records; resume / curriculum vitae ("CV"); and information from employment application process.
- Personnel training and evaluation: Personnel learning objectives; progress and results; Personnel development plan; Personnel self-assessment results; Personnel performance data, objectives and manager assessment results; training undertaken and completed; dates of training and qualifications obtained; industry certifications; and academic degrees.
- Compliance and disciplinary records: acknowledgments regarding internal policies; reports of violations of internal policies and codes of conduct; disciplinary sanctions; grievances; manager's name and reporting structure; and date and reason for resignation or termination.
- Background checks: details revealed by background checks conducted in accordance with applicable law and regulation (and, where required by applicable law or regulation, subject to your prior express written consent) including details of past employments, details of residence, professional qualification and relevant skills, credit reference information, and criminal records information.
- Security data: login details (including username and password); login records (including login location, login IP address, and failed login attempts); historic username and password details; closed circuit television ("CCTV") records; internal investigations records; records of your use of our IT systems; and evidence relating to any actual or suspected breach of any Piper Sandler policy, or applicable law or regulation.

Lawful basis for Processing Personal Data: In Processing Personal Data in connection with the purposes set out in this Policy, we may rely on one of the following legal bases:

- we have obtained your prior express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- the Processing is necessary in connection with your employment contract or contract of engagement;
- the Processing is required by applicable law or regulation; or
- we have a legitimate interest in carrying out the Processing, which is not overridden by your interests, fundamental rights, or freedoms. Where we rely on this legal basis, our legitimate interests are:
 - our legitimate interest in the management, operation and promotion of our business;
 - our legitimate interest in maintaining the safety and security of our Personnel, premises, assets and operations; and
 - our legitimate interest in the provision of services to our clients.

Processing your Sensitive Personal Data: We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is required or permitted by applicable law or regulation (e.g., to comply with our diversity reporting obligations);
- the Processing is necessary for the detection or prevention of crime;
- the Processing is necessary for the establishment, exercise or defence of legal rights; or
- we have, in accordance with applicable law and regulation, obtained your prior explicit consent before Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Purposes for which we may Process Personal Data: The purposes for which we may Process Personal Data, subject to applicable law and regulation, include:

- Recruitment: recruitment operations; advertising opportunities; record-keeping; and performing background checks.
- HR management: human resources management and other required management of Personnel throughout the course of the Personnel relationship; recruitment, appraisals,

performance management, advancements / promotions, and succession planning; internal communication and management of industrial relations; mobility management, including international assignment and Personnel travel administration; appraisal/review; Personnel training/learning and personal development; accounting; attendance and absence management; administration of paid time off, holidays, and leaves of absence; transfers; secondments; and creating and maintaining one or more internal Personnel directories.

- Training: Personnel training and awareness; career development activities; and skills management.
- Communications and IT operations: management of internal communications; provision and maintenance of IT systems and office equipment; equipment allocation record-keeping; operation of IT security, firewalls and anti-virus software; IT security processes; and audits.
- Health and safety: workplace health and safety management; health and safety assessments and record keeping; emergency notification; and compliance with related legal obligations.
- Compensation & Benefits: compensation planning and payments; administration of payroll, compensation, incentives programs, benefits and pensions; expense reimbursement; stock administration; and administration of bonuses.
- Management of systems and operations: administration of our IT systems; economic, financial and administrative management; planning; and reporting.
- Financial management: sales; finance; corporate audit; and vendor management.
- Future planning: succession and organizational planning, including budgeting.
- Compliance and disciplinary procedures: compliance with internal policies, codes of conduct and legal/regulatory obligations; disciplinary and grievance investigations; conciliation procedures; disciplinary procedures; and governance and internal reporting.
- Personnel Monitoring: in accordance with applicable law and regulation, Piper Sandler may monitor the use of our IT and communications systems (including personal devices connected to Piper Sandler network) and the information they contain, including network traffic and usage data, for purposes that may include systems maintenance, security, compliance with legal requirements and implementation of internal policies and procedures, as described in further detail in the Information Security Policy and the applicable Employee Handbook. Personal Data collected through such monitoring activities may be analysed and otherwise Processed in accordance with this Policy.

(C) Disclosure of Personal Data to third parties

We may disclose Personal Data to other Piper Sandler Affiliates for legitimate business purposes, in accordance with applicable law. In addition, we may disclose Personal Data to:

- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors to Piper Sandler, subject to binding contractual obligations of confidentiality;
- third party Processors (such as providers of payroll, pension scheme, insurance, medical benefits, human resources services, IT systems and support, and other third parties engaged to assist us in carrying out business activities), located anywhere in the world, subject to the requirements noted below in this Section (C);
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security; and
- any relevant third party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

If we engage a third-party Processor to Process Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data.

(D) International transfer of Personal Data

Because of the international nature of our business, we may need to transfer Personal Data to other Piper Sandler Affiliates, and to third parties as noted in Section (C) above, in connection with the purposes set out in this Policy. For this reason, we may transfer Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located. In particular, basic information about your role with other Piper Sandler Affiliates, via our internal Personnel directories. Other Processing of Personal Data by Piper Sandler is generally limited to our Personnel who have a legitimate business need to access Personal Data for one or more of the purposes set out in this Policy.

Where we transfer Personal Data to other countries, we do so on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section (K) below.

(E) Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law or regulation.

(F) Data Accuracy

Your Personal Data that we Process will be kept accurate and, where necessary, kept up to date. We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

(G) Data Minimisation

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

(H) Data Retention

We will keep copies of your Personal Data in a form that permits identification for at least as long as is necessary in connection with the purposes set out in this Policy and as long as the applicable law or regulation permits or requires.

The criteria for determining the duration for which we will keep your Personal data are as follows: we will retain your Personal Data for the duration of your professional relationship with Piper Sandler. Following termination of that relationship we may retain your Personal Data for additional periods to enable us to conduct our business and satisfy legal, auditing and insurance requirements, including any applicable limitation periods. We will delete or anonymise your Personal Data thereafter depending on the form of the record.

(I) Your legal rights

Subject to applicable law or regulation, you may have a number of rights regarding the Processing of your Personal Data, including:

- the right to request access to, or copies of, your Personal Data that we Process or Control, together with information regarding the nature, Processing and disclosure of those Personal Data;
- the right to request rectification of any inaccuracies in your Personal Data;
- the right to request, on legitimate grounds:
 - erasure of your Personal Data that we Process or control; and
 - restriction of Processing of your Personal Data that we Process or control;
- the right to object, on legitimate grounds, to the Processing of your Personal Data;
- the right to have your Personal Data transferred to another Controller, to the extent applicable;
- where we Process your Personal Data on the basis of your consent, the right to withdraw that consent; and
- the right to lodge complaints regarding the Processing of your Personal Data with a Data Protection Authority.

This does not affect your statutory rights. We do not take disciplinary action against Personnel for exercising any of these rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section (K) below.

(J) Your obligations

It is important that you are aware of your data protection compliance obligations, and that you fulfil those obligations. This means that you must adhere to Piper Sandler's policies, standards and procedures regarding the Processing of Personal Data to which you have access in the course of your duties. In particular:

- you must familiarise yourself with this Policy and with any Data Protection Procedure we may provide to Personnel;
- you must abide by applicable law and regulation at all times when Processing Personal Data;
- you must not access or otherwise Process any Personal Data beyond the extent necessary for your work with Piper Sandler; and
- you must keep all Personal Data that you Process strictly confidential, and this obligation of confidentiality continues after termination of your professional relationship with Piper Sandler.

(K) Contact details

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by Piper Sandler, please contact:

Piper Sandler Privacy Officer's delegated Human Capital privacy contact at

- HRServices@psc.com
- Piper Sandler, Attn: Human Capital Privacy Contact, 800 Nicollet Mall, Suite 1000, Minneapolis, MN 55402.

If you are employed by Piper Sandler Limited, you may also contact Sam Wiseman.

(L) Definitions

- **'Affiliate'** means, in relation to Piper Sandler Companies, all group entities that control, are controlled by, or are under common control with Piper Sandler Companies.
- **'Controller'** means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **'Data Protection Authority'** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **'Personal Data'** means information from which any individual is identified or identifiable.
- **'Process', 'Processing' or 'Processed'** means anything that is done with Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **'Personnel' or 'you'** has the meaning given in the opening paragraph of this Policy.
- **'Processor'** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **'Sensitive Personal Data'** means Personal Data concerning race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual orientation, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law or regulation.