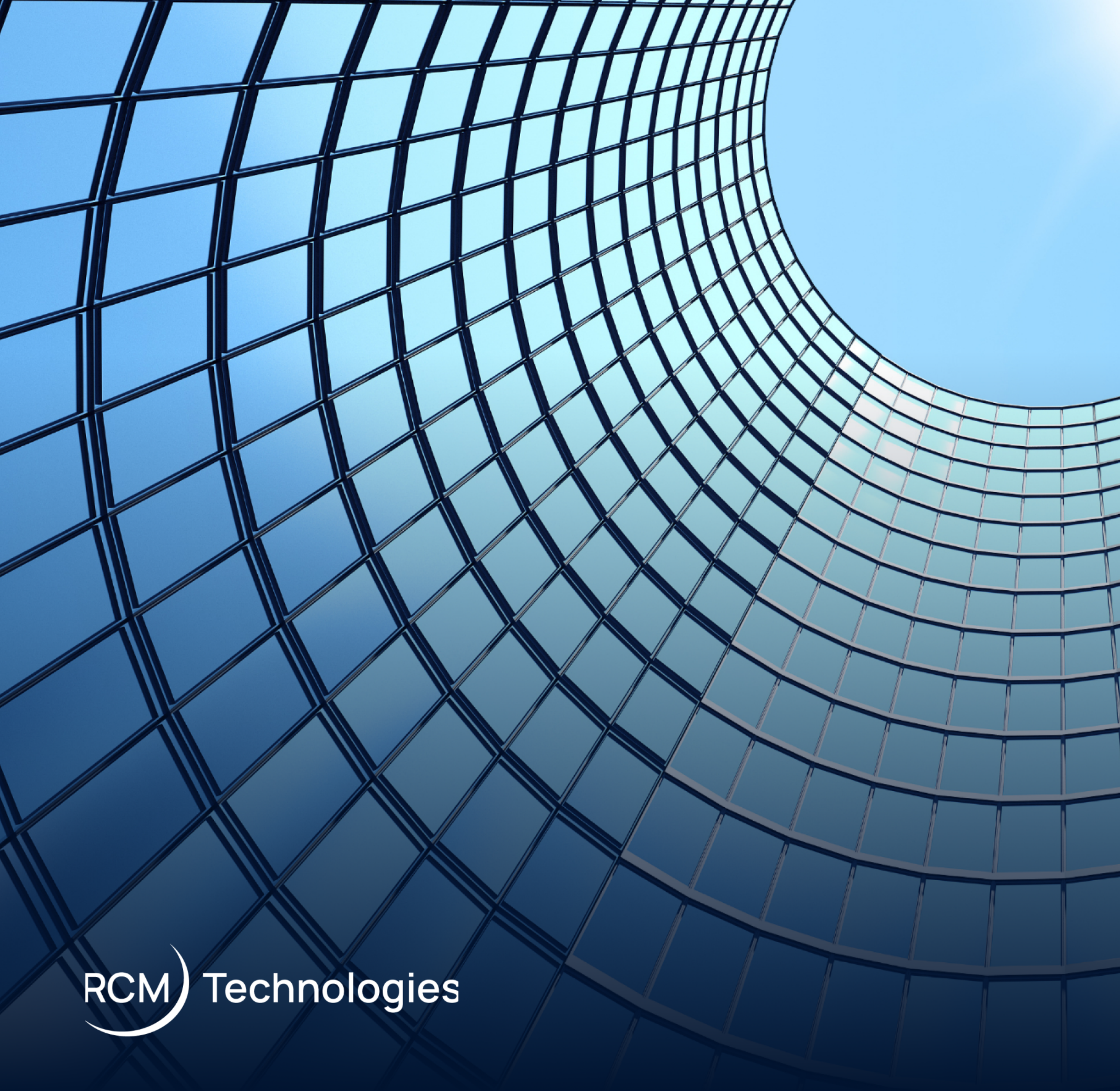

RCM Technologies

# Privacy Information Management Policy

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## 1 Purpose

- RCM complies with the ISO 27701 privacy framework regarding the collection, use, and retention of Personally Identifiable Information (PII) that is processed by RCM.

- All employees of RCM that have access to PII are responsible for conducting themselves in accordance with this policy. PII shall not be collected, used, or disclosed in a manner contrary to this policy without proper written permission from RCM's legal department.

## 2 Terms and Definitions

- RCM Platform: The RCM platform (the "platform") includes the software, hardware, communications capabilities, and other technology infrastructure supporting the functions outlined in section 4.

- RCM Data: RCM Data ("data") includes customer and other data used, stored, accessed, and/or processed on the platform.

- Personally Identifiable Information (PII): Information that identifies or can be used to identify specific individuals, also referred to as PII in this document.

- Company: Refers to RCM and all its legal entities and subsidiaries

- Data subject: An identifiable natural person who can be identified, directly or indirectly, by PII supplied to RCM.

- Sensitive PII: Any PII regarding a Data Subject's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, physical or mental health, or sexual life.

- Data Protection Officer (DPO): Representative of the company responsible for ensuring that their organization processes the personal data of relevant data subjects) in compliance with this policy.

## 3 Objectives of the Program

- Confidentiality: The system must ensure that RCM data is accessed by authorized users and for authorized uses only.

## 4 Policy

### 4.1 Conditions for collection and processing

#### *4.1.1 Customer Agreement*

- By using using RCM technologies services, customers agree to allow RCM Technologies to use their PII as outlined in this document.

- In the conduct of RCM's business operations, we may share PII with attorneys, consultants, human resources providers, payroll providers, and other service providers contracted to provide services for the activities, delivery, and management of RCM products and services.

#### *4.1.2 Purposes of PII collection*

- RCM collects only necessary information to provide services. PII processing is done only for necessary application functions and is not processed for any other reason.

#### *4.1.3 Marketing and advertising use*

- Data subjects will be contacted prior to any use of their PII for marketing or advertising purposes and such use will not be done without the data subjects consent. Consent to the use of PII for marketing or advertising by RCM is not required to leverage RCM services.

#### *4.1.4 Infringing instruction*

- RCM will make a best effort to inform customers of any potential processing instructions received that violate applicable legislation or regulations in the opinion of RCM’s legal counsel.

#### *4.1.5 Customer obligations*

- Where applicable, customer obligations are outlined within the contract signed with RCM.

#### *4.1.6 Records related to processing PII*

- All PII is considered strictly confidential by RCM and records containing PII are maintained for a minimum of five years and no more than 7 years unless a different retention period is defined in contractual language with the customer.

### 4.2 Obligations to PII principles

#### *4.2.1 Obligations to PII principles*

- Where applicable, contractual language will detail customer obligations to PII principles such as the timely correction or deletion of PII.

### 4.3 Privacy by design and privacy by default

#### *4.3.1 Temporary Files*

- Temporary files created during the processing of PII are retained for a minimum period of [xx] [d/m] after which they are destroyed.

#### *4.3.2 Return, transfer, or disposal of PII*

- In the event that RCM transfers PII to a third party acting as a controller, we will do so only if the third party has provided us with contractual assurances that it will:
  - Process the PII for limited and specified purposes consistent with the consent provided by the Data Subject
  - Provide the same level of protection as is required by ISO 27701 standard or equivalent
  - Notify us if they can no longer meet this obligation
    - If RCM receives such a notice, RCM will take reasonable and appropriate steps to stop and remediate any authorized processing

- RCM may disclose PII to approved third party data processors retained or contracted by RCM such as business partners and subcontractors, including, without limitation, affiliates, vendors, service providers and suppliers. We may share certain personal information with third parties who conduct marketing studies and data analytics, including those that provide tools or code which facilitates our review and management of our web site and services, such as Google Analytics or similar software products from other providers.

- Except to the extent agreed by the customer, RCM may be required to share personal information as required or permitted by law, regulation, legal process, court order, bankruptcy or other legal requirement, or when we believe in our sole discretion that disclosure is necessary or appropriate, to respond to an emergency or to protect our rights, protect your safety or the safety of others, investigate fraud, comply with a judicial proceeding or subpoenas, court order, law-enforcement or government request, including without limitation to meet national security or law enforcement requirements, or other legal process and to enforce our agreements, policies and terms of use. Other than the aforementioned exceptions, the use and disclosure of all transferred personal information will be subject to this Policy.

- RCM may be required to disclose PII in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

- All Data Subjects have the right to access the PII covered by this policy that RCM holds about them. Additionally, if PII is inaccurate or has been processed incorrectly, Data Subjects have the right to access their PII to correct it, amend it or delete it.

- To request access to, or correction, amendment or deletion of, PII, a Data Subject should contact us at: privacycommittee@RCMT.com. RCM will cooperate with all reasonable requests to assist Data Subjects to exercise their rights under this policy except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the rights of persons other than the Data Subject would be violated.

- RCM may modify this policy from time to time, consistent with changes to the requirements of the ISO 27701 framework, or changes within RCM organization. If RCM changes this policy, we will provide Data Subjects appropriate notice regarding such modifications by highlighting the changes on the RCM website, or by emailing Data Subjects' email addresses of record.

- Should you have any questions or concerns about this Policy or need to update certain personal information, please contact privacycommittee@RCMT.com

#### *4.3.3 PII transmission controls and security*

- RCM takes reasonable and appropriate measures to protect PII covered by this policy from loss, misuse, unauthorized access, disclosure, alteration and destruction. While RCM cannot guarantee the security of PII, we are committed to safeguarding all PII received.

- RCM only collects PII that is relevant for the purposes of processing. We do not process PII that is incompatible with the purposes for which it was collected or authorized by the Data Subject. Additionally, RCM takes reasonable steps to ensure that any PII that is collected is relevant to its intended use, accurate, complete and current.

- RCM retains PII in a form identifying or making identifiable a Data Subject only for as long as it serves a purpose of processing, which includes the performance of services, obligations to comply with professional standards and legitimate business purposes. We will only request the minimum amount of PII required to carry out these purposes, and will adhere to the Privacy Shield Principles for as long as we retain PII.

- RCM agrees to periodically review and verify our compliance with the ISO 27701 framework, and to remedy any nonconformities with that standard.

## 4.4 PII sharing, transfer, and disclosure

### *4.4.1 Basis for PII transfer between jurisdictions*

- Where legal counsel determines a transfer between jurisdictions will occur, RCM will inform data subjects at least two weeks prior to the transfer and allow the data subject to accept such changes or terminate their contract with RCM by contacting the DPO.

### *4.4.2 Countries and international organizations to which PII can be transferred*

- RCM may from time to time, and as it deems appropriate, transfer PII within or between the following entities:
    - Countries:
        - The United States of America
        - Member States of  the European Union
        - The Phillippines
        - India
        - Serbia
        - The United Kingdom
    - Organizations:
        - Microsoft
        - Amazon
        - Google

### *4.4.3 Records of PII disclosure to third parties*

- The Registry of Processing Activities (ROPA) maintains a record of all PII disclosures to third parties.  Data subjects may request information about their personal data by contacting the DPO.

### *4.4.4 Notification of PII disclosure requests*

- Where legally permissible, RCM shall inform data subjects of requests of relevant PII made by government organizations or State entities.

### *4.4.5 Legally binding PII disclosures*

- RCM will, with the opinion of legal counsel, reject any request for PII disclosure where legally permissible.

### *4.4.6 Disclosure of subcontractors used to process PII*

- Data subjects will be contacted by the DPO and informed of any pending disclosures of relevant PII to subcontractors prior to use.

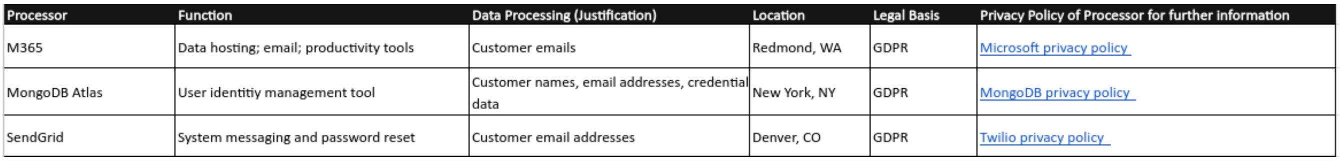
### *4.4.7 Engagement of a subcontractor to process PII*

- RCM will only engage with subcontractors to process PII within the bounds of the data subjects contract.

### *4.4.8 Change of subcontractor to process PII*

- RCM shall inform data subjects of any intended changes concerning the addition or replacement of subcontractors to process relevant PII, and provide the data subject opportunity to object to such changes by contacting the DPO.

- The following is the list of sub processors used by RCMT:



| Processor | Function | Data Processing (Justification) | Location | Legal Basis | Privacy Policy of Processor for further information |
|---|---|---|---|---|---|
| M365 | Data hosting; email; productivity tools | Customer emails | Redmond, WA | GDPR | Microsoft privacy policy |
| MongoDB Atlas | User identitiy management tool | Customer names, email addresses, credential data | New York, NY | GDPR | MongoDB privacy policy |
| SendGrid | System messaging and password reset | Customer email addresses | Denver, CO | GDPR | Twilio privacy policy |

# 5 Applicability

## 5.1 ISO/IEC 27001:2013 Controls

- A.5.1.1
- A.6.1.1
- A.6.2.1
- A.7.2.2
- A.8.2.1
- A.8.2.2
- A.8.3.1
- A.8.3.2
- A.8.3.3
- A.9.2.1
- A.9.2.2
- A.9.4.2
- A.10.1.1
- A.11.2.7
- A.11.2.9
- A.12.3.1
- A.12.4.1
- A.12.4.2
- A.13.2.1
- A.13.2.4
- A.14.1.2
- A.14.2.1

- A.14.2.5
- A.14.2.7
- A.14.3.1
- A.15.1.2
- A.16.1.1
- A.16.1.5
- A.18.1.1
- A.18.1.3
- A.18.2.1
- A.18.2.3

## 5.2 ISO/IEC 27701:2019 Controls

- 8.2.1
- 8.2.2
- 8.2.3
- 8.2.4
- 8.2.5
- 8.2.6
- 8.3.1
- 8.4.1
- 8.4.2
- 8.4.3
- 8.5.1
- 8.5.2
- 8.5.3
- 8.5.4
- 8.5.5
- 8.5.6
- 8.5.7
- 8.5.8

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