Personnel Privacy Notice

Effective: April 20, 2025

Scope

As part of our recruitment, employment, alumni program and during the course of your relationship[1] with Grant Thornton[2] ("Grant Thornton," the firm" or "we"), the firm collects, processes and stores certain of your personal information as necessary or appropriate for us to exercise our rights and fulfill our obligations as an employer. The firm is committed to being transparent about how it collects and uses personal information and to meeting its data protection obligations. The firm is committed to being transparent about how it collects and uses personal information and to meeting its data protection obligations.

This notice provides personnel with information on the categories of personal information collected, for what purpose it is collected, and the types of third parties with whom the firm shares it. We reserve the right to process your personal information as described in this notice without providing you with further disclosures about the specifics of such use cases or seeking your consent to do so, unless required by law.

Expectations of Privacy

As described in our Technology Usage and Information Security Policy, you do not have an expectation of privacy in your use of IT assets provided or made available to you by the firm. This includes any firm-issued or managed:

- Computers and mobile devices
- Associated software like cloud storage, collaboration, and communications tools
- Network infrastructure, including firm-provided Internet and mobile data access

Similarly, you do not have a general expectation of privacy in your access to, presence at, and activities in firm premises unless otherwise provided by law. This includes our offices as well as temporary space that we may have rented for a specific purpose like event venues.

Workplace Monitoring

Certain laws prohibit the use of monitoring or surveillance in certain areas within firm premises generally intended for personal, non-business use like restrooms, nursing, or

wellness rooms, changing rooms, and break rooms. Other laws restrict or prohibit monitoring or surveillance of certain activities such as live conversations.

[1] Includes full-time or part-time employees, partners, directors, company officers, interns, secondees, and seasonal, temporary workers.

[2] For purposes of this policy, references to Grant Thornton or "the firm" are to Grant Thornton LLP and Grant Thornton Advisors LLC (and their respective subsidiary entities). Grant Thornton LLP and Grant Thornton Advisors LLC practice as an alternative practice structure in accordance with the AICPA Code of Professional Conduct and applicable law, regulations and professional standards. Grant Thornton LLP is a licensed independent CPA firm that provides attest services to its clients, and Grant Thornton Advisors LLC and its subsidiary entities provide tax and business consulting services to their clients. Grant Thornton Advisors LLC and its subsidiary entities are not licensed CPA firms.

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Grant Thornton monitors and may retain electronic mail, chats, high level firm asset location data, computer log data, facilities and systems access data and other transmissions occurring on firm-issued assets, internet access, and use of any other firm- owned or managed electronic devices, applications, or systems. In addition, you may use tools for timekeeping or other work purposes that capture your activities (e.g., keystrokes, mouse movements and windows open) while using firm equipment. Such monitoring is subject to applicable laws, contracts, professional standards, and firm policies, and occurs only for authorized purposes (including for litigation or security purposes) as described in this notice.

This monitoring includes use of organizational, physical, and technical measures to monitor our IT infrastructure and premises. We use these solutions to protect our offices, the health and safety of individuals who work there or visit the confidentiality of information that maintain in our possession, and to monitor compliance with firm policies. Our Technology Usage and Information Security Policy describes how we monitor our IT infrastructure to protect firm, client, and personnel data from unauthorized disclosure and use and how we will act when we detect security incidents as described in relevant policies.

What personal information do we process?

Grant Thornton collects and processes information about you that we use to perform our duties, fulfill our obligations, and exercise our rights as an employer and federal contractor. We may collect this personal information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from identification documents such as a driver's license, or collected through interviews or other forms of assessment, including our online independence disclosure and compliance questionnaire processes. We may also collect personal information about you from third parties, such as information obtained from background checks we conduct upon recruitment/hire, promotion, and when required by a client engagement or other contract, applicable law, and/or professional standards. Sometimes we may create this information ourselves, such as when we assign employee ID numbers or create email accounts for you. Personal information we process under this notice includes:

- Identifying information such as your name and likeness, social security number, and employee ID numbers like your USID and benefits ID numbers
    - Where required by certain clients, this information may also include your fingerprints, which are a form of biometric information, as described in our Privacy Policy. If we need to collect your fingerprints, we will do so subject to the terms of our Biometric Information Policy.
- Activities associated with your USID that are generated as you interact with firm equipment and facilities (e.g., building and systems access)
- Contact information like your personal mailing and email addresses and any personal telephone number you provide
- Demographic information like your date of birth, gender, race, ethnicity, disability status, accommodation status, and veteran status
- Information you provide as you participate in our business resource groups or other firm-sponsored activities
- Information about your background and qualifications for your role, including the contents of your resume (e.g., your job and educational history, your skills and experience, professional credentials); the results of a preemployment background check (which may include a credit report if your role requires us to run a credit check), and your professional biography
- Information about your salary and total compensation package, including

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entitlement to benefits such as 401k, pension, or insurance benefits
- The terms and conditions of your employment or partnership
- Your bank account details (including routing number) that are needed for direct deposit
- Your marital status, next of kin, dependents, beneficiaries, and emergency contacts
- Information related to your authorization to work in the U.S., which could include your citizenship or work-visa status
- Personal financial and relationship information (such as brokerage accounts, stock ownership, creditor, and lender relationships, etc.) for you, your spouse/partner, and other close relatives so the firm can fulfill and enforce independence requirements
- Your participation in any former employer's 401k or similar plan
- Your working schedule (days of work and working hours) and attendance at work, including facility access information
- Meeting recordings taken during the course of your work
- Details of any period of leave taken by you, including flexible time off, sick time, parental leave, medical/disability leave, sabbatical, personal leaves of absence, or any other leave offered by the firm and/or available under applicable law, including any supporting documentation such as doctor's notes or other medical information as may be requested to support the leave
- Details of any disciplinary action in which you have been involved, including any warnings issued to you, as well as any related correspondence
- Information gathered as part of an internal firm investigation, including information provided during interviews in which you have participated
- Performance assessments, including quarterly and annual performance reviews, training records, performance improvement plans, or any other related correspondence
- Information about your medical or health conditions, including whether you have a disability and/or have sought an accommodation under relevant federal state or local law as well as medical condition information related to immigration requirements and medical assessment information
- Information about your religious beliefs, practices, or observances in connection with religious accommodations sought under applicable federal, state or local law
- Your vaccination status, including COVID-19 vaccination status, where necessary to comply with applicable firm policy, client requirements and/or public health requirements
- Data necessary to support travel such as government issued (TSA) frequent traveler numbers, memberships in travel programs, travel preferences, etc.
- Survey data that you provide to us during the course of your employment or in exit interviews
- Association membership numbers for AICPA and professional license numbers and expiration dates

Where necessary for certain business purposes, we may process additional personal information not listed in this notice. In those cases, we will provide you with a supplemental notice when we acquire the additional personal information. If that is impracticable, we will provide the supplemental notice when we initiate the business purpose that the data processing supports.

Why do we collect this information?

The firm needs to process your personal information to ensure that it is complying with its legal and contractual obligations and with firm policies. For example, Grant Thornton is required to check a successful applicant's eligibility to work in the U.S. by requiring completion of an I-9 Form and E-Verify and by collecting supporting documentation. As a U.S. government contractor, the firm is obligated to collect EEO-related information, such as race, gender, disability, and veteran status.

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In addition to reporting this information to federal and state government agencies as required by law, the firm uses this data for managing and supporting federally mandated affirmative action plans and internal diversity initiatives. We are also legally required to maintain accurate and up-to-date personnel records and contacts, including emergency contact information of family, domestic partners, or friends that you may provide. The legal definition of a personnel record varies by state, but generally includes your job application, resume or CV, performance reviews, compensation history, position history and disciplinary records, if any. Some information, such as records related to health or medical conditions, is processed to carry out employment law obligations (e.g., those in relation to employees with disabilities, for health and safety purposes and/or for immigration documentation). We also seek information about criminal convictions and, for certain roles, credit history to mitigate risk to firm personnel and assets, to meet legal obligations, and/or to satisfy client engagement requirements. If you provide us with your personal and/or mobile phone number, we may use this to assist in validating your identity to access firm equipment, network, systems, and facilities or to text you regarding emergency alerts. In addition to your residential address, we may request information that supports the physical location where you reside so that we may accurately calculate applicable taxes and identify the office to which you report. Periodically, we request information about your spouse/domestic partner or dependents for the administration of our benefits programs. We only collect this information where it is necessary for us to carry out our obligations or to undertake specific activities in relation to employment or partnership.

Who has access to personal information?

Certain of your information will be shared internally, including with members of the People & Community team, payroll, your manager, other managers in the service line or group in which you work or interact, and our Risk Regulatory & Legal Affairs, Compliance, Privacy, Information Security, and Information Technology groups, if access to the information is necessary for performance of their duties. We also share your information with third parties that process data on our behalf, such as third-party benefit administrators, our insurance brokers, benefits providers, IT managed service providers, federal, state, and local governments, and consultants. We may also disclose your personal information to other firms that have joined the Grant Thornton multi-national platform. We may also use or disclose your personal information as we believe to be necessary or appropriate in the event of a merger, acquisition, or asset sale. Certain of your information may also be shared with prospective clients in connection with RFPs and proposals, clients as part of engagements and other third-party service providers that support our professional service teams, for example your CV or resume. Your personal information may be shared in connection with other legal or regulatory proceedings, such as complying with subpoenas, litigation, or any other regulatory inquiries where the firm's cooperation or compliance is required. For certain roles, your biography and photograph are generally made available to the public as part of our professional, and your personal, brand. If you attend an event that the firm hosts, your photograph or image may be distributed internally via our internal social network or intranet.

How do we protect personal information?

Grant Thornton takes the security of your personal information seriously. We have internal policies and controls in place to safeguard against accidental loss, destruction, misuse, or disclosure of your data, as well as against unauthorized access to your data except by

authorized firm personnel in the proper performance of their duties. Our Technology Usage and Information Security Policy and Information Classification Policy describe the safeguards

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we use to secure your personal information against unauthorized access, disclosure, loss, or use.

How long do you keep my personal information?

We will hold your personal information for the duration of your employment or partnership and for any length after your relationship with the firm ends to comply with legal and statutory obligations and our records retention policies.

California employees

California law requires additional privacy disclosures for California employees. Please see Grant Thornton's California Personnel Privacy Addendum for those disclosures.

European Union employees

As the data controller of the Personal Data of EU employees, the firm is required to give EU employees notice about data protection rights under the General Data Protection Regulation (EU) 2016/679 ("EU GDPR"); the EU GDPR as amended and incorporated into the UK's European Union (Withdrawal) Act 2018 and the UK Data Protection Act 2018 (together, "European Data Protection Laws"), please see Grant Thornton's European Privacy Addendum for more information.

Who can I talk to if I have questions or requests?

If you have questions about this notice or the firm's Privacy Policy or would like to exercise your rights under our Privacy Policy or applicable law, you can contact the Grant Thornton privacy team at privacy.questions@us.gt.com.

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