



Global Privacy Policy

1. Purpose

The MS Technology, Inc. (“MST”) is committed to protecting the privacy of Personal Data of its Employees, Customers, business partners, and other individuals. MST has, therefore, implemented a global privacy program to establish and maintain high standards for creating, collecting, using, disclosing, storing, securing, accessing, transferring, or otherwise processing Personal Data. This Global Privacy Policy is the foundation of that program and describes the approach taken by MST when processing Personal Data worldwide.

2. Scope

All MST employees, contractors, vendors, consultants, temporary agency workers, and other agents of any MST (“MST Employees”) must comply with this Policy, including all personnel affiliated with third parties who may have access to any MST network or resource, including cloud-based services, hosted inside or outside of MST.

This Global Privacy Policy applies globally to Personal Data that MST processes, whether by electronic or non-electronic means (i.e., in hard copy, paper, or analog form). This Policy applies to any Personal Data Processing that is done for or by MST, and provided guidance to MST Employees on the proper handling of Personal Data.

3. Policy

3.1. Adequate Safeguards for Processing of Personal Data

In conjunction with the Global People Data Protection Policy, the European People Data Protection Policy, and the Business Personal Data Privacy Policy, this Global Privacy Policy is also intended to provide adequate safeguards for the processing of Personal Data entrusted to MST and transferred from countries requiring such protections. This is to help enable MST to transfer Personal Data wherever it is needed globally to support its internal business processes or promote services and product functionality and improvement. To do this, the Global People Data Protection Policy, European People Data Protection Policy, and the Business Personal Data Privacy Policy each describe certain additional obligations and legal rights in circumstances where European Data Protection Law, American, Asia-Pacific Economic Cooperation (APEC), and other countries or regions’ Personal Data Protection and Privacy Laws or requirements differ and are applicable.

3.2. Compliance with Applicable Law

MST shall comply with applicable Personal Data Protection and Privacy Laws and requirements worldwide.

Where applicable Personal Data Protection and Privacy Laws require a higher standard of protection for Personal Data than presented in this Global Privacy Policy, the requirements of applicable personal data protection law shall prevail. Where applicable Personal Data Protection and Privacy Laws establish a lower standard of protection for Personal Data than presented in this Global Privacy Policy, the requirements of this Global Privacy Policy shall prevail.

Where MST Employees have reason to believe that applicable law prevents MST from fulfilling its obligations under this Global Privacy Policy, they shall promptly inform the Privacy Center of Excellence and MST Legal via the Privacy Request Form. Where there is a conflict between applicable law and this Global Privacy Policy, the Compliance Officer and MST Legal shall make a responsible decision regarding what action to take to resolve such a conflict and shall consult with the relevant regulatory authority in cases of doubt. This includes resolving conflicts that may arise in the course of business taking place in a third country which are likely to have a substantial adverse effect on the guarantees provided by this policy.

3.3. Privacy Principles

The following high-level principles establish MST practices for collecting, using, disclosing, storing, securing, accessing, transferring, or otherwise processing Personal Data.

- **Fairness**
MST shall process Personal Data in a fair, lawful, legitimate, and transparent manner.
- **Purpose Limitation**
MST shall only create or collect Personal Data for a specific, explicit, and legitimate purpose(s). Any subsequent processing shall be compatible with such purpose(s), unless MST has obtained the individual's consent, or the processing is otherwise permitted by law.
- **Proportionality**
MST shall only process Personal Data that is adequate, relevant, and not excessive for the purpose(s) for which it is processed.
- **Data Integrity**
MST shall keep Personal Data accurate, complete, and up to date as is reasonably necessary for the purpose(s) for which it is processed.
- **Data Retention and Disposal**
MST shall keep Personal Data in a form that is personally identifiable for no longer than necessary to accomplish the purpose(s), or other permitted purpose(s), for which the Personal Data was obtained. Thereafter, it shall either be destroyed, deleted, anonymized, or removed from our systems.
- **Data Security**
MST shall implement appropriate and reasonable physical, technical, and organizational measures to safeguard Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, use, or access. MST shall instruct and contractually require third parties processing Personal Data on behalf of MST, if any, to: (a) process it only for purposes consistent with MST's purpose(s) for processing; and (b) implement appropriate physical, technical, and organizational measures to safeguard the Personal Data.

- **Individual Rights**

MST shall process Personal Data in a manner that respects individuals' rights under applicable Personal Data Protection and Privacy Laws.

- **Accountability**

MST shall implement appropriate governance, policies, processes, controls, and other measures necessary to enable it to demonstrate that its processing of Personal Data is in accordance with this Global Privacy Policy and applicable Personal Data Protection and Privacy Laws.

3.4. Availability of this Policy

MST will make this Policy available to data subjects by publishing it on a public-facing MST website that is accessible to the data subjects, and in the case of the data subjects being MST employees, on a MST intranet site that is accessible to the employees.

3.5. Cooperating with Supervisory Authorities

MST will respond promptly and appropriately to requests from supervisory authorities about this Global Privacy Policy and any other matters or concerns regarding privacy laws and regulations.

3.6. Updates to this Policy

MST may periodically review and revise its personal data protection and privacy practices, policies, and procedures including this Global Privacy Policy. If any significant changes are made, MST shall:

- Take reasonable steps to inform all MST Employees, Customers, business partners, and other data subjects affected by the revisions; and
- Post appropriate notices referring to the changes on the relevant websites—both internal and external, as appropriate; and
- Inform the relevant regulatory authority in accordance with applicable law.

4. Policy Compliance

MST is committed to ensuring that this Global Privacy Policy is observed by all MST Employees. MST Employees must comply with this Global Policy.

4.1. Compliance Management

MST's Compliance Officer is responsible for monitoring and ensuring compliance with applicable privacy and data protection laws and this Policy.

4.2. Compliance Measurement

Compliance with this Global Privacy Policy is verified by various means, including reports from available business tools, internal and external audits, self-assessment, and/or feedback to the policy owner(s). MST will monitor its compliance with this Policy on an ongoing basis. MST will periodically verify that this Global Privacy Policy continues to conform to the applicable Personal Data Protection and Privacy Laws and is being complied with. MST will make the final results of

reports of its internal or external Audits to relevant regulatory authorities upon request and with appropriate confidentiality protections.

4.3. Noncompliance

Compliance with MST policies is required. Deviations or non-compliance with this Policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary actions, including termination, civil action and lawsuits, and referral for criminal prosecution as allowed by local laws.

In some countries, violations of regulations designed to protect Personal Data may result in administrative sanctions, penalties, claims for compensation or injunctive relief, and/or other civil or criminal prosecution and remedies against MST and culpable persons in their individual capacity.

4.4. Case-by-Case Exceptions

If you wish to obtain an exception to this policy, you must contact the Compliance Officer at CO@ms-technology.com. All documentation of any exceptions to this policy will be kept on file and made available to the Legal Department, and Human Resources Department as appropriate.

5. Related Documents

- Code of Business Conduct
- Online Privacy Statement