

**Crystal Equation Corporation  
Data Privacy Framework Privacy Policy  
For Human Resources Data**

To provide an adequate level of protection for Personal Data received from the European Union (“EU”), Switzerland, and the United Kingdom (“UK”), Crystal Equation Corporation (the “Company”), located in the United States, complies with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework (collectively, the “DPF”) as set forth by the U.S. Department of Commerce. The Company has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles with regard to the processing of Personal Data received from the EU and from the UK, and to the Swiss-U.S. Data Privacy Framework Principles with regard to the processing of Personal Data received from Switzerland, pursuant to the DPF (collectively, the “DPF Principles”). This Data Privacy Framework Privacy Policy (the “Privacy Policy”) describes the privacy principles that the Company follows when processing Personal Data received, pursuant to the DPF, from the EU, Switzerland, and the UK that relates to prospective, current, or former employees.

For purposes of this Privacy Policy, “Personal Data” means information, in any form, relating to an identified or identifiable individual described above who resides in the EU, Switzerland, or the UK (collectively, the “DPF Countries”) and which is transferred to the Company pursuant to the DPF. If there is any conflict between the terms of this Privacy Policy and the DPF Principles, the DPF Principles shall govern. You can find more information about the DPF, or to view the Company’s certification to the DPF, by visiting <https://www.dataprivacyframework.gov/>.

**1. The Company’s Collection And Use Of Personal Data**

The Company collects and uses Personal Data to administer the recruitment process and the employment relationship. The Personal Data is stored in the U.S. in the Company’s human resources information system (“HRIS”) database and in other information systems, which allow authorized U.S. management and human resources personnel to review and analyze that Personal Data.

The Company collects and uses Personal Data to facilitate the administration of the potential or actual employment relationship between its prospective, current and former employees in the DPF countries and to carry out human resources activities affecting those individuals. These purposes include, without limitation: recruitment; workforce management (such as global succession planning and preparing headcount reports); administering compensation, payroll, benefits, and pensions; administering security for physical facilities and information systems; administering performance reviews; maintaining workplace safety; making travel arrangements; addressing various legal obligations related to the employment relationship (such as internal investigations, for tax purposes, and discovery obligations in civil litigation); providing training; administering the Company’s compliance process; and for emergency contact purposes.

The Personal Data consists largely of information provided by prospective, current and former employees, for example: information in resumes and completed job applications; name, address, telephone number, and other contact information; date of birth; passport or national ID number; educational history and professional certifications and licensing information; bank account information (for payroll purposes); marital status and information about dependents or beneficiaries for benefits administration; and information created by the Company to administer the employment relationship, such as business contact information, job title, job category, job

status, payroll-related information, disciplinary records, employment-related preferences, and performance reviews.

Before processing Personal Data, the Company provides the individual with a notice concerning the processing of their Personal Data. The Company will not use or disclose Personal Data for any purpose that has not previously been disclosed to the prospective, current, or former employee unless: (a) the individual has received notice and an opportunity to exercise choice, as described below, with respect to such use or disclosure; or (b) applicable law permits the use or disclosure without requiring that the Company first comply with the DPF's Notice and Choice Principles.

## **2. The Company's Disclosure Of Personal Data**

The Company may disclose prospective employees' Personal Data to non-agent third parties as described in the Company's [Privacy Statement](#). The Company may disclose current and former employees' Personal Data to non-agent third parties as described in a Notice of Data Collection, Processing and Transfer, made available to employees in the DPF Countries.

The Company may disclose Personal Data to authorized service providers for the purposes described above, such as administering employee benefits programs, payroll programs, pension and other retirement programs, and in connection with the Company's recruiting services. Before making such disclosures, the Company obtains written assurances from the service provider that it will safeguard Personal Data in a manner consistent with this Privacy Policy as well as other contractual protections required by the DPF and other applicable laws. If the Company learns that a service provider is using or disclosing Personal Data in a manner contrary to this Privacy Policy, the Company will take reasonable steps to stop and remediate the unauthorized activity. The Company remains liable for unauthorized processing by service providers to which Personal Data is disclosed, unless the Company proves that it is not responsible for the matter giving rise to the damage.

The Company may be required to disclose, and may disclose, Personal Data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. To the extent permitted, the Company will inform relevant individuals before making such disclosure and provide them with a reasonable opportunity to object to such disclosure.

## **3. Choices for Limiting Certain Uses And Disclosures Of Personal Data**

The Company will provide individuals the opportunity to opt out from the following activities in relation to their Personal Data: (a) the disclosure of their Personal Data to a non-agent third party; and (b) the use of their Personal Data for purpose(s) materially different from the purpose(s) for which the Personal Data was originally collected or subsequently authorized by the individual to be used or disclosed. The Company will provide individuals with clear, conspicuous and readily available mechanisms to exercise their choices should such circumstances arise. Prospective, current, and former employees who reside in the DPF Countries and wish to limit the use or disclosure of their Personal Data should submit their request to [privacy@crystalequation.com](mailto:privacy@crystalequation.com).

## **4. Security For Personal Data**

The Company is committed to safeguarding Personal Data. While the Company cannot guarantee the security of Personal Data, the Company takes reasonable precautions to protect Personal Data from loss, misappropriation, and unauthorized access, disclosure and destruction.

The Company utilizes a combination of online and offline security technologies, procedures and organizational measures to help safeguard Personal Data. These measures include reasonable and appropriate administrative, physical, and technical safeguards for Personal Data, for example, storage of Personal Data on a secure server when in electronic form and in physically secure areas when in paper form, firewalls and anti-malware protections, and secure destruction practices. Technical and physical controls restrict access to Personal Data to authorized Company employees with a need to know.

## **5. Individuals' Rights With Respect to Personal Data**

Upon request, in accordance with the DPF Principles, and subject to applicable limitations and exceptions, the Company will grant individuals access to their Personal Data and will permit them to correct, amend or delete their Personal Data that is inaccurate or incomplete or that is being processed in violation of the DPF Principles. Individuals who wish to exercise these rights can do so by contacting the Company at [privacy@crystalequation.com](mailto:privacy@crystalequation.com). For security purposes, the Company may require verification of the requestor's identity before responding to the request. Any other inquiry concerning the Company's processing of Personal Data may also be submitted to the e-mail address above.

## **6. Information And What To Do If You Have a Complaint**

The Company will conduct periodic self-assessments of its relevant practices to verify adherence to this Privacy Policy, the DPF Principles, and the DPF. In compliance with the DPF Principles, the Company commits to resolve complaints about our collection, use or disclosure of Personal Data. Any individual who has a complaint concerning the Company's processing of their Personal Data should submit a personal data privacy complaint via email to [privacy@crystalequation.com](mailto:privacy@crystalequation.com) or via mail to the President of the Company's Personal Data Protection Office, 200 W. Madison St. Suite 970 Chicago, IL 60606 USA. The Company will promptly investigate, and attempt to resolve, such complaints in accordance with this Privacy Policy and the DPF Principles.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, the Company commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources Personal Data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

If your complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for residual claims not resolved by the other DPF mechanisms described above. The Company also is subject to the investigatory and enforcement authority of the U.S. Federal Trade Commission.

**Effective Date:** July 2, 2025