

Stretto, Inc. Privacy Statement for Employees and Prospective Employees Who Reside Outside of the State of California¹

Effective Date: May 8, 2018

Last Updated: April 29, 2025

For purposes of this Statement, “Personal Data” shall mean all information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person or household.

Stretto, Inc. is committed to protecting the privacy and security of Personal Data that we process in the course of our business. We have internal privacy and data governance policies that apply to all team members and operations. These policies help ensure the appropriate collection, processing, and protection of Personal Data, regardless of whether the collection happens online or offline. Employment, benefits administration, and compliance requirements necessitate Stretto’s receipt of Personal Data from employees, prospective employees, and sometimes their dependents or family members. This Privacy Statement outlines our practices regarding the Personal Data we receive and process.

Collection and Use of Personal Data

Stretto collects and processes Personal Data only as instructed or permitted by you or as required by law. We have appropriate security controls in place to protect your information and limit access to your Personal Data to authorized personnel. Stretto may disclose Personal Data internally or to third-party service providers when necessary to provide services, perform internal functions (such as payroll or benefits processing), or comply with legal requirements. Contracts require these providers to protect Personal Data and use it solely for the intended purpose. Stretto does not disclose your Personal Data to external entities unless:

- The law requires us to do so (e.g., law enforcement requests, subpoenas);
- You instruct us to do so;
- Benefits administration or other HR functions necessitate it.

Mobile and System Access

If you receive access to any Stretto platforms, tools, or systems and your account remains inactive for a defined period (subject to internal IT policies), we will suspend and

¹ Employees and applicants who are residents of the State of California should refer to the *California Consumer Privacy Act Disclosure to Stretto Employees and Applicants* posted [here](#).

subsequently terminate your access. You may request early deactivation by contacting Human Resources.

Questions and Privacy Requests

If you have questions regarding your privacy rights, including how we collect, use, or retain your Personal Data, or if you would like to make a request in relation to your privacy rights, please contact the Legal department at [**legal@stretto.com**](mailto:legal@stretto.com).

International Data Transfers

If Stretto transfers Personal Data outside the United States for service-related purposes, we conduct such transfers in accordance with applicable data protection laws. We ensure that appropriate safeguards are in place for all international data transfers.

Sensitive Personal Data

Stretto processes Sensitive Personal Data such as Social Security numbers or health-related information when employment and benefits require it. We implement reasonable technical, physical, and administrative safeguards to protect this data. Access is strictly limited to those with a business need and subject to confidentiality obligations.

Anti-Money Laundering & Compliance Monitoring

In compliance with applicable financial and regulatory obligations, Stretto may process Personal Data to verify identity and eligibility for services or employment, monitor transactional integrity, or satisfy due diligence requirements.

Retention of Personal Data

Stretto retains Personal Data for as long as necessary to facilitate the business purposes described herein, and as necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

Contact Us

Stretto is committed to transparency and accountability. If you have questions about this policy or how we process your data, direct inquiries to:

Stretto, Inc.

Attn: General Counsel

410 Exchange, Suite 100

Irvine, CA 92602

Email: Legal@stretto.com