

## Planet Data Privacy Notice for California Personnel and Applicants

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For additional information contact: [mydata@planet.com](mailto:mydata@planet.com)

### I. INTRODUCTION

Planet Labs PBC and its subsidiaries (collectively referred to as “**Planet**”) are committed to handling information responsibly and in compliance with company standards and applicable privacy laws. This Data Privacy Notice for California Personnel and Applicants (“**Notice**”) explains how Planet collects, uses, and handles personal information (information that directly or indirectly identifies you) that it gathers in the employment context.

### II. SCOPE

This Notice applies to current, former, and prospective employees, volunteers, interns, directors, officers, retirees, temporary and casual workers, consultants, agents, independent contractors, and beneficiaries of such persons who live in California (collectively, “**Personnel**”).

This Notice does not form part of any employment contract or contract to provide services. In addition, if you provide services to Planet through or in connection with another company, we are not responsible for that company’s privacy practices.

This Notice does not apply to our handling of data gathered about you in your role as a user of Planet’s services. When you interact with us in that role, the Privacy Policy associated with the relevant service applies.

We may update this Notice at any time. We may also provide you additional privacy notices regarding our collection, use or disclosure of information. Please read this Notice and any other privacy notices carefully.

### III. PERSONAL INFORMATION COLLECTED

We collect, store, and use various types of personal information through our application, recruitment, engagement, employment, or contracting processes. We collect such information either directly from you or (where applicable) from another person or entity, such as an employment agency or consultancy, recruitment or professional networking website, background check provider, event sponsor, or others who provide references. We will collect additional personal information throughout the course of your employment or other provision of services to us.

The type of information we have or will have about you depends on your role with us and may include, where applicable:

- **Identifying information**, such as a name, alias, postal address, email address, phone number, employee number, security and system access information (e.g. login and password information, keycard number and usage), or other similar identifiers;
- **Financial, medical, or health insurance information**, such as banking details, tax information, equity grants, withholdings, salary, benefits, and expenses;

- **Legally protected classification information**, such as gender or gender identity, marital status, race, national origin, military service, disability status, criminal history, health or family leave information, or ethnicity or national origin;
- **Professional or employment-related information, including:**
  - **Recruitment, employment, or engagement information**, such as application forms and information included in a resume, cover letter, or otherwise provided through any application or engagement process; and copies of identification documents, such as driver's licenses and passports; and background screening results and references.
  - **Career information**, such as work location, job/position title, assignments, business group and country code information, supervisor and reporting information, employment contract information, promotion information, benefits information, expenses information (e.g., receipts, travel details), information regarding previous work experience, professional skills, professional memberships, community involvement, qualifications and work history, training details, criminal history and assessment and performance-related information.
  - **Financial information** such as salary and other compensation or bonus data, payroll, pension or retirement contribution information, and bank account and tax information.
  - **Business travel and expense information** such as corporate expenses.
  - **Union membership.**
- **Education information** collected during the recruiting process, such as institutions attended, degrees obtained, and certifications.
- **Government identification information**, such as Social Security number, driver's license number, passport number, birth certificate number, or other government identification.
- **Internet or other electronic network activity or Planet systems information**, such as information about your phone, laptop or other company issued devices, including technical information (e.g., information about device hardware and software attributes), business email accounts, and business messaging accounts (e.g. Slack); use of Planet's network and intranet (e.g., browsing history, search history, data retrieval records) and communication systems (e.g., information on or about company work stations and systems or company-issued devices, including email and message contents, attachments, and metadata), and information captured on security systems, which may include Closed Circuit Television ("CCTV") and key card entry systems.
- **Audio or visual information**, such as content or recordings taken (including photos, audio, or video) relating to the employment (e.g., photos for employee badges; photos, or videos of corporate events); CCTV footage, as well as other information related to the security of our premises and systems; and for applicants, a recording of how to pronounce your name.
- **Medical information** about you, and, if applicable, your beneficiaries, such as medical conditions and other information provided in statement of health forms, disability status, health and safety incidents or accidents, sickness records, and health issues requiring adaptations to your working environment or working practices.

- **Other information that directly or indirectly identifies you**, such as age, number of children, date and place of birth, citizenship, and immigration status (and such information about your dependents or emergency contacts or beneficiaries); information on any publicly available social media profile of yours; survey responses; and any other information you choose to provide us.

#### IV. HOW PLANET USES PERSONAL INFORMATION

Planet uses personal information collected for a variety of purposes related to the management of Planet's business, such as for standard business operations (such as providing IT services), to carry out human resources functions (such as hiring or providing benefits), to contact employees in the case of an emergency, and to comply with legal requirements.

- **Recruitment and workforce planning purposes**, including job advertising, evaluating applications, assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference checks or background checks and checking visa status and/or eligibility to work (where applicable), conducting interviews, selecting and hiring personnel, and generally managing the hiring process and communicating with you about it.
- **HR management and administration**, including workflow management (such as assigning, managing, and administering projects), performance management, career development, disciplinary actions, benefits and compensation, leave, scheduling, performance appraisals and recognition, providing references, preparing analyses and reports, and communicating with our personnel about updates or relevant information about perks, benefits and discounts, and changes to company products and services.
- **Performance of business operations**, such as business continuity, accounting, financial planning, providing and monitoring IT systems for any lawful purpose, maintaining accounts and internal directories, protecting occupational health and safety, participating in due diligence activities related to the business, and conducting internal analyses and audits.
- **Security operations**, including detecting security incidents, and preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution; and monitoring and controlling access to company premises and locations (including through use of CCTV).
- **Legal compliance**, such as complying with anti-bribery, tax, social security and immigration obligations; responding to and cooperating with legal or regulatory requests and investigations; and responding to and cooperating with law enforcement requests.
- **Exercising our legal rights**, including enforcing our licenses, seeking advice from our legal counsel, addressing litigation-related issues, preventing or detecting crime, fraud, abuse or theft, conducting internal investigations, and protecting the safety of Planet employees and visitors.

We may also use personal information for any other legally permitted purpose (subject to your consent, where legally required).

Certain information we collect may be "**sensitive personal information**" under California law. We use such information as necessary to conduct our relationship with you, in the following ways:

- Social Security number, driver's license number, passport number, birth certificate number, or other government identification for legal compliance, payroll, benefits, tax, and immigration purposes.
- Union membership information for legal compliance and compliance with collective bargaining agreements or to exercise rights thereunder.
- Health information, which may include disability status, to provide reasonable workplace accommodations and manage absences, for workplace health and safety purposes, and for compliance with applicable law and contracts or to exercise rights thereunder.
- Racial/ethnic origin, sexual orientation, and/or disability status for equal opportunity and diversity and inclusion purposes and compliance with applicable law or to exercise rights thereunder.

California law places certain obligations on businesses that “sell” personal information to third parties or “share” personal information with third parties for cross-context behavioral advertising as those terms are defined under the California Consumer Privacy Act (“CCPA”). We do not “sell” or “share” the personal information covered by this Notice and have not done so in the twelve months prior to the effective date of this Notice.

The personal information we do or will collect, including sensitive personal information, will be retained for as long as necessary to satisfy the purposes for which it was collected and our legal obligations. As described above, these purposes include our business operations and complying with reporting, legal and accounting obligations. In determining how long to retain information, we consider the amount, nature and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we process the personal information and whether we can achieve those purposes in other ways, the applicable legal requirements, and our legitimate interests.

For example, we will keep certain information about former employees (e.g., name job title, organizational hierarchy, and records of employment) for as long as necessary for our legitimate interests in keeping this information as part of our organizational history and to comply with law. The purposes we process information (as well as the other factors listed above) may dictate different retention periods for the same types of information. For example, tax records that have employee names are normally retained for four years (or longer if required by law), after the deadline to make the applicable filing, while employee names in email headers may be kept indefinitely depending on the nature of the email.

## V. HOW PLANET DISCLOSES YOUR PERSONAL INFORMATION

We may disclose personal information to the following types of entities or in the following circumstances (where applicable):

- **Internally:** to people within certain parts of the company to carry out the purposes described in this Notice, including to your manager, human resources, and payroll, IT, legal, regulatory and compliance, and finance personnel.
- **Service providers and other vendors** that provide services to Planet, such as compensation and benefits providers, tax and other professional advisors, travel management providers, human resource suppliers, group benefit plan carriers, background check providers, employment businesses (in relation to contractors and agency workers),

billing and payment service providers, shipping and fulfillment providers, data storage/web hosting providers, security providers, consultants, and legal counsel.

- **Business operations:** to provide another entity (such as a potential or existing business counterparty or customer) with a means of contacting you in the normal course of business, for example, by providing your contact details, such as your phone number and email address.
- **Legal compliance and exercising legal rights:** when required to do so by law, regulation, or court order or in response to a request for assistance by the police or other law enforcement agency; and to seek legal advice from our external lawyers or in connection with litigation with a third party.
- **Business transaction purposes:** in connection with the sale, purchase, or merger of a business.
- **Consent:** with your consent and as permitted by law, we may share personal information with any other third parties in any other circumstances.

## VI. RIGHTS OF CALIFORNIA RESIDENTS

**Your rights.** California residents have certain rights regarding their personal information. Subject to certain exceptions, you may request:

- access to your personal information including the right to know the categories of personal information we have or will collect about you and the reason we will or have collected such information;
- deletion or removal of your personal information; and
- correction of the personal information that we have or will hold about you that is inaccurate.

You also have the right not to be discriminated against (as provided for in California law) for exercising your rights.

**Exceptions to your rights:** There are certain exceptions to these above rights. For instance, we may retain your personal information if it is reasonably necessary for us or our service providers to provide a service that you have requested or to comply with law or to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for that activity.

**Exercising your rights:** To exercise one of the rights above, you may contact us by email at [mydata@planet.com](mailto:mydata@planet.com).

We also will take reasonable steps to verify your identity before responding to a request. In doing so, we may ask you for verification information so that we can match at least two verification points with information we maintain in our files about you. If we are unable to verify you through this method, we shall have the right, but not the obligation, to request additional information from you.

## VII. REVISIONS TO THIS PRIVACY NOTICE

This Notice may be updated periodically to reflect changes in our privacy practices. When we change this policy, we will inform you by updating the Wiki and any other method required by law.

