Your privacy is important to us. We respect the privacy rights of all individuals and we are committed to handling personal data responsibly and in accordance with applicable law. This privacy notice, explain what personal data Nautilus Hyosung America, Inc. ("NHA") collects, uses, and maintains (collectively "processes") about you in the operation of its business, how it uses that data, and your rights to that data.

Please note that this notice applies to the handling of your personal data as an employee, candidate or as external staff (individuals who are not employed by NHA that have access to NHA facilities. This could include agency temporary workers, outsourced staff, contractors, and business guests).

This notice is not intended and shall not be read to create any express or implied promise or contract for employment, for any benefit, or for specific treatment in specific situations. Nothing in this notice should be construed to interfere with NHA ability to process employee data for purposes of complying with its legal obligations, or for investigating alleged misconduct or violations of company policy or law, subject to compliance with internal policy and local legal requirements.

NHA processing of personal data is in all cases subject to the requirements of local law, internal policy, and any consultation requirements with worker representatives (where appropriate). To the extent this notice conflicts with local law in your jurisdictions, local law controls.
What Personal Data We Collect

The data we collect can include the following, but is not limited to:

Name and contact data. Your first and last name, employee identification number, email address, postal address, phone number, photo, beneficiary and emergency contact details, and other similar contact data. Additionally, you may opt to provide NHA with additional contact information such as personal email address(es) and/or cell phone number(s).

Demographic data. Your date of birth and gender. We may also collect and process "Sensitive Personal Information" about you in accordance with local requirements and applicable law. This may include any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, trade union membership, or information about your health, disabilities, or sexual orientation. We will use this information to comply with anti-discrimination laws and government reporting obligations and to help insure equal employment opportunities. We may also request information about your physical or mental condition to provide work-related accommodations, to provide health and insurance benefits to you and your dependents, or to manage absences from work. We may further request, where permitted by law and on a voluntary and consensual disclosure basis, sensitive personal information such as information about your racial/ethnic origin, sexual orientation, veteran status, and disability status. We will use this information on a de-identified and aggregated basis to help provide a more diverse and inclusive workplace through our Diversity, Inclusion and Accessibility programs.

National identifiers. Your national ID/passport, residency and work permit status, social security number, or other taxpayer/government identification number.

Employment details. Your job title/position, office location, employment contract, offer letter, hire date, termination date, performance history and disciplinary records, leave of absence, sick time, and vacation/holiday records.

Spouse/partner and dependents' information. Your spouse/partner and dependents' first and last names, dates of birth, and contact details.

Background information. Academic and professional qualifications, education, Resume, credit history and criminal records data (utilized for background check and vetting purposes where permissible and in accordance with applicable law and consultation requirements).

Financial information. Bank account details, tax information, salary, retirement account information, company allowances and other information necessary to administer payroll, taxes and benefits.
Workplace, Device, Usage, and Content data. Electronic communications transmitted within our corporate network, building and information system access, NHA device, system and application usage (including telemetry) when accessing and using NHA corporate buildings, services and assets.

Why We Process Personal Data

We process your personal data (and, where necessary, data for your dependents, beneficiaries and other individuals associated with your employment) for the varied purposes set out below. Failure to provide your personal data when requested may prevent us from being able to carry out these tasks and/or comply with our legal obligations.

1. To administer your employment contract, external staff engagement, offer letter or other commitments we’ve made to you

We process your personal data primarily for the purpose of managing our employment or working relationship with you, and to fulfill our obligations under your employment contract, or applicable NHA policies, including payroll, benefits administration, tax reporting, and the like. A few examples: your employment contract, your offer letter (e.g. so we can on-board you), promotion history and performance reviews (e.g. so we can manage our employment relationship with you), and your bank account and salary details (e.g. so we can pay you or provide HR benefits). If you are a candidate, we process your data to engage with you about NHA career opportunities, consider your application for employment to specific roles at NHA, and other similar uses including candidate screening, interview scheduling and management, lawful background checks, and to on board you at NHA if you receive and accept an offer of employment with us. If you are external staff, the type of personal data we process is limited to what is needed to manage your engagement with NHA and access to NHA facilities and information systems.

2. Other overriding and legitimate business purposes

We also may process your personal data when it is necessary for other legitimate purposes, such as general HR administration, our global directory of employees and external staff, general business management and operations, disclosures for auditing and reporting purposes, management of network and information systems security and business operations, provision and improvement of employee services, physical security and to
protect the life and safety of employees and others. We may also use special applications and systems that record employee performance metrics, such as sales related or code databases for business operations purposes as well as for the purposes of reviewing, rewarding and coaching employees on their performance. We may also process your personal data to investigate potential violations of law or breaches of our internal policies.

3. Legally required purposes

We also may process your personal data when we consider it necessary for complying with laws and regulations, including collecting and disclosing personal data as required by law (e.g., for minimum wage, working time, tax, health and safety, anti-discrimination laws, global migration), under judicial authorization, or to exercise or defend the legal rights of NHA.

4. Other uses of your data (where permissible and in accordance with applicable law and consultation requirements)

We also may process data about you and your usage of and interaction with NHA products, services and internal applications and tools, when you use them to conduct NHA business, to measure and improve these products, or to assess or improve how it conducts its business; use of your data for product improvement may include human and machine review of such data to train AI models and improve machine learning for NHA products and services. While NHA allows incidental use of its corporate applications and tools for personal reasons; personal data you transmit through these systems may be used for product improvement. Where required by law or internal policy, we will seek your consent to such uses; and where your consent is sought, we will ensure your consent is knowing, truly voluntary, and that you suffer no adverse consequence from any decision to withhold or revoke your consent.

Collection and Use of Data from Third Parties and Social Media

We may also collect personal data about you from third parties or public sources as needed to support the employment relationship or to engage with you concerning job opportunities at NHA. For example, before and during the course of your employment or assignment with NHA, we may collect information from public social media sources, such as your public LinkedIn profile, for recruitment purposes. We also may conduct lawful background screenings, to the extent permitted by law, through a third-party vendor for information about your past education, employment, credit and/or criminal history. In the event of a natural disaster or other life/safety emergency, we may rely on public social
media posts or other public sources to account for employees if otherwise unable to contact them. Additionally, if there is an investigation of an employee matter, we may obtain information relevant to the incident from external sources including private parties, law enforcement or public sources like news sources and public social media posts.

Change of purpose

We will only use your personal data for the purposes outlined in this notice or such purposes as may be reasonably compatible with the original purpose for which it was collected or there is an alternative legal basis for the further processing. For example, you may provide personal information to NHA while researching job openings, but once you apply for a specific role, NHA may need to process your personal information based on other legal bases for processing.

How and Why We Share Personal Data

NHA will only share your personal data with those who have a legitimate need for it. Whenever we permit a third party to access personal data, we will make sure the data is used in a manner consistent with this notice (and any applicable internal data handling guidelines consistent with the sensitivity and classification of the data). Your personal data may be shared with our subsidiaries and affiliates and other third parties, including service providers, for legitimate purposes as follows:

1. In order to carry out the uses of personal data described above (See section titled: Why We Process Personal Data);
2. To provide services to our customers, to sell our products to our customers, resellers and agents.
3. To enable third parties to provide services to us. Categories of recipients of data would include financial investment service providers, insurance providers, payroll support services, relocation, tax and travel management services, health and safety experts, and child care providers;
4. To comply with our legal obligations, regulations or contracts, or to respond to a court order, administrative or judicial process, such as a subpoena, government audit or search warrant. Categories of recipients would include counter-parties to contracts, judicial and governmental bodies;
5. In response to lawful requests by public authorities (such as national security or law enforcement);
6. To seek legal advice from external lawyers and advice from other professional advisers such as accountants, management consultants, etc.;
7. As necessary to establish, exercise or defend against potential, threatened or actual litigation (such as adverse parties in litigation);
8. Where necessary to protect NHA, your vital interests, or those of another person;
In connection with the sale, assignment or other transfer of all or part of our business (such as a potential purchaser and its legal / professional advisers); or

Otherwise in accordance with your consent.

Please note that where legal requirements and/or internal policy limit the sharing of your data, NHA will respect such requirements.

Our Rights to Your Personal Information

In some regions, you may have certain rights under applicable data protection laws (such as the European General Data Protection Regulation).

Use of Cookies and Web Beacons

Site pages may use cookies (small text files placed on your device). Cookies allow us, among other things, to store your preferences and settings; enable you to sign-in; combat fraud; and analyze how our websites and online services are performing.

We also use web beacons to help deliver cookies and gather usage and performance data. Our websites may include web beacons and cookies from third-party service providers.

You have a variety of tools to control cookies, web beacons and similar technologies, including browser controls to block and delete cookies and controls from some third-party analytics service providers to opt out of data collection through web beacons. Your browser and other choices may impact your experiences with our websites and systems.

Workplace Security and Monitoring

NHA monitors its IT and communications systems through automated tools such as network authentication and wireless connectivity hardware and software, anti-malware software, website filtering and spam filtering software, security software for cloud-based applications, and mobile device management solutions. The primary purpose of this monitoring is to protect NHA, its employees, customers and business partners, for example:

1. For system, applications, and network security, including in particular the security of NHA’s IT system and assets, and the safety and security of its employees, external staff and other third parties;
2. For network and device management and support;
3. For proof of business transactions and recordkeeping;
4. For the protection of confidential information and company assets;
5. For investigating wrongful acts or potential violations of company policy; and
6. For other legitimate business purposes as permitted under applicable law. We also monitor our offices, and other workplace facilities, through video monitoring like closed-circuit television ("CCTV") and badge scans for security purposes. CCTV is primarily used at office entrance and exit points, elevator lobbies, rooms where there may be valuable equipment, such as server rooms, and in other select areas with a high risk for theft or with highly sensitive assets. CCTV is not used in private spaces such as restrooms, new mothers’ rooms or locker rooms nor is it used to monitor employee workstations for performance reasons.

You should be aware that any message, files, data, document, facsimile, audio/video, social media post or instant message communications, or any other types of information transmitted to, through or from, received or printed from, or created, stored or recorded on our IT and communications systems and assets (included via the use of personal devices accessing corporate IT systems) are presumed to be business-related and may be monitored or accessed by us in accordance with applicable law and workplace agreements (such as works council agreements), and subject to NHA’s internal policies concerning access to and uses of such data. NHA will not review data stored on your personal mobile device without your consent.

Other Important Privacy Information

Security of Your Personal Data

NHA is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. For example, we store the personal data you provide on computer servers with limited access that are located in controlled facilities, and, when we transmit certain highly confidential or sensitive personal information, we protect it through the use of encryption.

Where We Store and Process Personal Data

NHA operates at the global level and therefore personal data may need to be transferred to countries outside of where it was originally collected. For example, because we are headquartered in the United States, information collected in other countries is routinely transferred to the United States for processing. When we transfer your personal data to a different country, we will ensure that this transfer complies with applicable laws and legislation.
Our Retention of Personal Data

Personal data will be stored according to applicable laws or regulatory requirements and kept as long as is necessary to fulfill the purposes for which the personal data was collected. Generally, this means that your personal data will be retained as documented in our corporate data retention schedule and applicable riders and supplements.

Changes to this Privacy Notice

We may occasionally update this privacy notice. When we do, we will revise the "last updated" date at the top of the privacy notice. If there are material changes to this notice or in how NHA will use your personal data, we will use reasonable efforts to notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review this privacy statement to learn how NHA is protecting your personal data.

How to Contact Us

For copies of additional privacy documents mentioned in this notice, or if you have a privacy concern or question related to this notice, please contact NHA.

Our address is:
Nautilus Hyosung Americas, Inc.
6641 N. Beltline Road, Suite 100
Irving, Texas 75063