



Applicant Data Privacy Policy

Applicant Data Privacy Policy [Last Update: Jan 2022]

In the course of its business, Satellogic and its subsidiaries (collectively, "Satellogic") collect Personal Data (as defined below) from applicants.

Satellogic is committed to protecting the privacy of the information collected. This Privacy Policy (the "Policy") sets forth the principles and guidelines governing the protection of the Personal Data processed.

The purpose of this Policy is to let applicants know how Satellogic collects and uses their Personal Data and how they can control its use.

It is Satellogic policy to abide by applicable legislation and regulations, including but not limited to the General Data Protection Regulation 2016/679, the United Kingdom General Data Protection Regulation and the Data Protection Act of 2018, the California Consumer Protection Act and other data protection and privacy regulations as may be applicable to where we conduct business or otherwise engage with prospective applicants and employees. We respect the provisions of these regulations as they guide on the protection of natural persons with regard to the processing of personal data.

Scope of this Policy

This Policy applies to the Personal Data provided to Satellogic by applicants through the application process.

Personal data ("Personal Data") means any information relating to an identified or identifiable person. An identifiable person is a person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person.

Data Collected and Purposes for Collection

In the course of the recruitment process Satellogic requires applicants to provide Personal Data that may vary depending on the country, in order to comply with applicable employment laws. Subject to applicable law, Personal Data collected may include:

- personal descriptors (gender, name, date of birth, place of birth, address, email, address, etc.);
- employment information (employment history, areas of expertise, job type preferences, evaluations, reference interviews, etc.);
- education information (educational background, diplomas, etc.); and
- any other Personal Data as may be relevant for the purposes listed below.

In all cases, however, the Personal Data requested is limited to data necessary to the purposes of conducting the recruitment and/or processing on-going hiring (it being understood that applicants may choose to provide Satellogic with additional Personal Data on a voluntary basis), including:

- Evaluate applicants and find the best talents for the vacancies or positions with Satellogic;

- Manage recruitment sources (ie those sources where an applicant may learn of a Satellogic opportunity);
- Background checks including reference checks; and
- Government reporting where local regulation may apply (reporting may include aggregated information regarding our applicant pool).

Before sharing Personal Data concerning a European Union, United Kingdom or State of California resident with a third party, Satellogic will ascertain that the third party: (i) safeguards Personal Data consistent with this Policy; and (ii) is subject to the applicable data protection and privacy regulation or offers “an adequate level of protection” in accordance with said regulation.

Personal Data Retention Record

Processing of Personal Data includes using, storing, recording, transferring, adapting, summarizing, amending, sharing and destroying Personal Data as necessary under the circumstances or as otherwise required by law. Satellogic may require original documents containing Personal Data that verify employment eligibility and identification, which information may be processed in the same manner.

Satellogic does not store Personal Data of applicants for more time than necessary. Retention periods may vary depending on the data categories and the application and review process. Applicants consent to up to eighteen (18) months of Personal Data retention to allow for the consideration of the Applicant for a specific opportunity and future opportunities. Satellogic will communicate with an email on or about a annual cadence to verify your interest and provide you an opportunity to opt out.

Satellogic will only process the Personal Data for the purposes for which the consent was given.

All Personal Data that has been collected will be stored for a limited duration that is relevant to the purpose of such collection and for so long as permitted by applicable law.

Where Satellogic is processing and using Personal Data as permitted by law or under consent, Satellogic will store them (i) where Satellogic has a legitimate interest in using them, only as long as required to fulfil the purposes set out above or (ii) where Satellogic has a legitimate interest in using Your Personal Data, until the applicant objects to Satellogic’s use of his/her Personal Data or (iii) where such applicant gave his/her consent, until he/she withdraws it. However, where Satellogic is required by applicable law to retain his/her Personal Data longer or where his/her Personal Data is required to assert or defend against legal claims, Satellogic will retain them until the end of the relevant retention period or until the claims in question have been settled.

Transfer of Personal Data

As a global company, Satellogic is able to leverage technology to efficiently manage Personal Data and obtain candidate applications online throughout its global operations. Satellogic may provide access to Personal Data to Satellogic personnel in other countries for the above purposes. This will involve the transfer of Personal Data in and outside the applicants’ country. It might also be necessary to disclose Personal Data to suppliers, contractors or service agents providing services to Satellogic in connection with the above mentioned uses.

Subject to certain legal requirements, Satellogic may use external service providers to collect, process and validate Personal Data, such as education, work history, compensation, background, references, and status. Satellogic might also disclose Personal Data to satisfy the legitimate requirements of a third party which is considering acquiring some of Satellogic’ business operations.

With respect to Personal Data transferred from the European Union or United Kingdom to the United States or other non-European locations, please note that Satellogic subsidiaries who have received Personal Data relating to applicants in the European Union or the United Kingdom offer “an adequate level of protection” in accordance with European legislation.

Satellogic will also disclose Personal Data to third parties if Satellogic determines, in its discretion, that such disclosure is necessary to protect Satellogic legal interests, such as in the following types of circumstances: (i) as a matter of law (e.g., to tax and social security authorities); (ii) to protect Satellogic’ legal rights (e.g., to defend or prosecute a lawsuit or administrative proceeding); or (iii) in an emergency where health or security of an applicant may be endangered. These transfers may be transmitted over the internet, via mail, via facsimile, or by any other method that Satellogic determines is appropriate and in accordance with applicable law.

Where Satellogic has knowledge that an employee or internal contractor is using or disclosing Personal Data contrary to this Policy or applicable law, Satellogic will take reasonable steps to prevent or stop such use or disclosure.

Right to Access, Rectification and Other Rights

Satellogic will take reasonable steps to ensure that the Personal Data collected is used for the purposes stated in this Privacy Policy and that such Personal Data is correct and up to date.

Pursuant and subject to the General Data Protection Regulation 2016/679, the United Kingdom General Data Protection Regulation and Data Protection Act of 2018, and the State of California Consumer Protection Act on the protection of natural persons with regard to the processing of personal data, as well as related national provisions adopted pursuant to these regulations and other local applicable laws, applicants can (i) access their Personal Data, subject to the principle of proportionality or reasonableness, (ii) correct, complete or update of their Personal Data, by sending an email to compliance@satellogic.com or (iii) ask for the restriction of processing, by notifying the Human Resources Department or by sending an email to compliance@satellogic.com. Satellogic will use reasonable efforts to correct any reported factual inaccuracies in Personal Data. Depending on the scope of the request and in the event the frequency of such requests exceeds once per twelve (12) month period, Satellogic reserves the right to charge a reasonable fee to cover any out-of-pocket costs (such as copying fees) incurred in connection with such access and correction.

Applicants should notify the Satellogic Human Resources Department concerning changes in Personal Data, such as legal change of name, address, and other such status changes.

Applicants should contact the Satellogic Human Resources Department or send an email to compliance@satellogic.com.

Satellogic may deny access to Personal Data in limited situations as defined by applicable laws and regulations.

Security of Personal Data

Satellogic has in place reasonable safeguards with respect to the protection and security of Personal Data.

All Personal Data will be treated as confidential. Therefore, Satellogic restricts access to such Personal Data to Satellogic employees, independent contractors or agents who have a need to know such data in carrying out their job role in accordance with the purposes for which the Personal Data was collected or otherwise in furtherance of the performance of the duties at Satellogic. All non-business related access and/or disclosures are prohibited. All the people who have access to Personal Data are bound by a formal duty of confidentiality.

Every employee must contribute to the confidentiality of Personal Data by respecting technical access and clearance processes and procedures. Satellogic maintains reasonable physical, electronic, and procedural safeguards to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction. As part of those safeguards, Satellogic employs technology designed to protect Personal Data during its transmission and prevent transmission errors or unauthorized acts of third parties.

Although Satellogic has put into place reasonable safeguards to protect Personal Data, we recognize that there is no method of transmitting or storing Personal Data that is completely secure. If an applicant has reason to believe that the security of his/her Personal Data has been compromised or misused, they should contact the Satellogic Human Resources Department.

Dispute Resolution

Satellogic will investigate and attempt to resolve complaints regarding use and disclosure of Personal Data in accordance with the principles contained in this Policy.

If the matter is not resolved through internal Satellogic procedures, i.e. by contacting the Satellogic Human Resources Department, then applicants who are residents from the European Union, Lichtenstein or Norway may directly report the matter to the local Data Protection Authority (e.g., in France: the C.N.I.L); applicants who are residents from the United Kingdom may directly report the matter to the Information Commissioner's Office; and applications who are residents of the State of California may directly report the matter to the California Office of the Attorney General. Non- residents of the above stated regions / countries / states should follow local procedures for dispute resolution.

Unauthorized access to or misuse of Personal Data may be treated as serious offenses as required by local regulation and practice.

Contact

Any questions or comments concerning this Policy can be submitted to the Satellogic Human Resources Department or by email to Satellogic Data Protection Officer at compliance@satellogic.com.

Policy Effective Date and Revisions

This Policy is communicated to Satellogic applicants. Occasionally Satellogic may update this Policy to accurately reflect any changes to its privacy practices or as required to comply with legal requirements. The most recent policy will be published and will reflect the effective date.