



Privacy Shield Principles – MorganHR, Inc.

MorganHR, Inc. (“MorganHR”) has adopted this Privacy Shield Statement (“Statement”) to establish and maintain an adequate level of data protection. This Statement applies to the collection, use, and retention of personal information from European Union member countries.

MorganHR complies with the EU-U.S. Privacy Shield Framework as set forth by the US Department of Commerce with regard to the collection, use, and retention of personal information transferred from the European Union and the United Kingdom to the United States in reliance on Privacy Shield. MorganHR has certified to the Department of Commerce that it adheres to the Privacy Shield Privacy Principles with respect to such information. If there is any conflict between the policies in this Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program and to view our certification page, please visit <https://www.privacyshield.gov>.

MorganHR is committed to cooperating with the European Union and the United Kingdom authorities concerned in the conformity with the Supplemental Principles on Human Resources Data and the Role of the Data Protection Authorities, and MorganHR will comply with the advice given by such authorities.

MorganHR does not disclose personal information to third parties. MorganHR is, however, subject to the investigatory and enforcement powers of the Federal Trade Commission and other US government entities and may be required to disclose personal information in response to lawful requests by public authorities to meet national security or law enforcement requirements.

The Federal Trade Commission (FTC) has jurisdiction over MorganHR’s compliance with the Privacy Shield.

All MorganHR employees who handle personal information from Europe are required to comply with this statement.

MorganHR acknowledges that it would be potentially liable for onward transfers to third parties of personal data of EU individuals received pursuant to Privacy Shield.

MorganHR has designated the MorganHR Executive Team to oversee our data privacy program, including our compliance with the EU Privacy Shield program. The MorganHR Executive Team shall review and approve any material changes to this program as necessary.



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In compliance with the Privacy Shield Principles, MorganHR commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact MorganHR at:

privacy@morganhr.com

As part of our participation in Privacy Shield, if you have a dispute with us about our adherence to the Privacy Shield Principles, we will seek to resolve it through our internal complaint resolution process. In certain circumstances, the Privacy Shield Framework provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in Annex I to the Privacy Shield Principles.

MorganHR has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship. If you do not receive timely acknowledgement of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for more information or to file a complaint. The services of EU DPAs are provided at no cost to you.

At all times, individuals have the right to access their personal data. Their personal data is available through the SimplyMerit user interface. Alternatively, you may request access to your personal data by contacting MorganHR at:

privacy@morganhr.com.