



Title	Privacy Policy - Employee Data & Social Security
Department	Human Resources
Effective Date	6/2023
Review Date(s)	5/2024
Revision Date	

POLICY

Enchanted Fairies is committed to maintaining the confidentiality of personal employee information that it collects during the regular course of business. Furthermore, it is the policy of the Company to protect the confidentiality of such data.

Collection of Information

In the course of conducting our business and complying with federal, state, and local government regulations governing such matters as employment, tax, insurance, etc., we must collect Personal Information from you. The nature of the information collected varies somewhat for each employee, depending on your employment responsibilities, your employment location, and other factors. We collect Personal Information from you solely for business purposes, including those related directly to your employment with the Company, and those required by governmental agencies.

Data collected may include, without limitation, such things as:

- Employee Name
- Date of Birth
- User ID(s)
- Gender, race, ethnicity
- Phone Number
- Health and disability data
- Email address(es)
- Family-related data (e.g, marital status, dependents)
- Banking and other financial data
- Personal and health-related data for you and your dependents
- Government identification numbers (e.g, Social Security number, driver's license number)

Because the Personal Information collected by the Company is necessary for business purposes, you are required to provide it. Your refusal or failure to provide the requested Personal Information may, therefore, disqualify you from employment with Enchanted Fairies or from certain company benefits.

Anyone who sends unsolicited data to the Company by any means (i.e., mail, email, fax) expressly consents to the storage, destruction, processing, or disclosure of the data, as well as any other reasonable business-related use by the Company or any government agency of the unsolicited data.

The Company will not knowingly collect or use Personal Data in any manner not consistent with this Policy, as it may be amended from time to time, and applicable laws.

Use of the Information We Collect

The primary purposes for collection, storage and/or use of your Personal Information include, but are not limited to:

- **Human Resources Management.** We collect, store, analyze, and share (internally) Personal Information in order to attract, retain, and motivate a highly qualified workforce. This includes recruiting, compensation planning, succession planning, reorganization needs, performance assessment, training, employee benefit administration, compliance with applicable legal requirements, and communication with employees and/or their representatives.
- **Business Processes and Management.** Personal information is used to run our business operations including, for example, scheduling work assignments, managing company assets and reporting; and populating employee directories. Information may also be used to comply with government regulation.
- **Communication and Identification.** We use your Personal Information to identify you and to communicate with you.

Disclosure of Data

The company acts to protect your Personal Information and ensure that unauthorized individuals do not have access to your Information by using security measures to protect Personal Information. We will not knowingly disclose, sell, or otherwise distribute your Personal Information to any third party without your knowledge and, where appropriate, your express written permission, except under the following circumstances.

- **Legal requests and investigations.** We may disclose your Personal Information when such disclosure is reasonably necessary (i) to prevent fraud; (ii) to comply with any applicable statute, law, rule or regulation; or (iii) to comply with a court order.
- **Third-party vendors and service providers.** We may, from time to time, outsource services, functions, or operations of our business to third-party service providers. When engaging in such outsourcing, it may be necessary for us to disclose your Personal Information to those service providers, e.g., a payroll service, benefits providers. In some cases, the service providers may collect Personal Information directly from you on our behalf. We will work with any such providers to restrict how the providers may access, use and disclose your information.
- **Business Transfers.** During the term of your employment we may buy other companies, create new subsidiaries or business units or other business operational transactions. It is likely that some or all of your Personal Information will be transferred to another company as part of any such transaction. However, your Personal Information will remain subject to protection outlined in the then current Privacy Policy.
- **Protection of Company and Other.** We may release Personal Information when we believe release is necessary to comply with the law; enforce or apply our policies and other agreements; or protect the rights, property, or safety of Company, our employees, or others. This disclosure will never, however, include selling, renting, sharing or otherwise disclosing your Personal Information for commercial purposes in violation of the commitments set forth in this Privacy Policy.

Social Security Numbers Collected

Social Security numbers (SSN) shall be collected only where required by federal and state law for legitimate reasons consistent with this Privacy Policy.

All employees are required to have a SSN in order to be employed by Enchanted Fairies for accurate state, federal, benefits, etc. reporting.

Social Security numbers will be collected for the following purposes.

- Pre-employment background check.
- Verification of employment eligibility.
- Tax reporting, payroll records, and other accounting purposes.
- State and/or federal new hire reporting.
- Benefits/insurance and retirement plans.

Except as required by necessary and legitimate business purposes, no employee is permitted to have access to SSNs (including documents that contain any SSNs) or to keep, view, use, copy, disclose, or distribute another person's SSN, or in any other way disclose another's SSN. One who accesses a SSN for necessary and legitimate business purposes is prohibited from using or accessing the SSN in a manner that may permit an unauthorized individual to view, use, or access the number.

When documents containing SSNs are no longer needed and are to be discarded, such documents must be disposed of in a manner that ensures the confidentiality of the SSNs. Enchanted Fairies has developed a practice for shredding, electronically deleting, or otherwise disposing of confidential records, including documents containing SSNs.

Security of Your Personal Information

We employ reasonable security measures and technologies, such as password protection, encryption, physical locks, etc., to protect the confidentiality of your Personal Information. Only authorized employees have access to Personal Information. If you are an employee with such authorization, it is imperative that you take the appropriate safeguards to protect such information. Paper and other hard copy containing Personal Information (or any other confidential information) should be secured in a locked location when not in use. Computers and other access points should be secured when not in use by logging out or locking. Passwords and user ID's should be guarded and not shared. When no longer necessary for business purposes, paper and hard copies should be immediately destroyed by using paper shredders or similar devices. Do not leave copies in unsecured locations waiting to be shredded or otherwise destroyed. Do not make or distribute unauthorized copies of documents or other tangible medium containing personal data. Electronic files containing Personal Information should only be stored on secure computers and not copied or otherwise shared with unauthorized individuals within or outside of the Company.

The Company will make reasonable efforts to secure Personal Information stored or transmitted electronically secure from hackers or other persons who are not authorized to access such information.

Compliance with this Privacy Policy is important to the Company. Any violation or potential violation of this Policy should be reported to Human Resources. The failure by any employee to follow these privacy policies may result in disciplinary action, up to and including, termination of employment.