



Data Privacy Accountability Statement

Policy Owner	Archer Legal
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Purpose

As a global organization, Archer may be subject to several data protection regimes across various jurisdictions (which may include but is not limited to the General Data Protection Regulation ("GDPR") and California Consumer Privacy Act ("CCPA")). Applicable data protection laws require that companies processing personal data must continue to ensure they have proper controls over the processing and security of personal data, according to applicable data protection principles, and to ensure that they effectively manage and record how personal data is stored, kept up to date, accessed, transferred and deleted. This Accountability Statement sets forth how Archer complies with applicable Data Protection Laws.

Policy Statement

Archer has a privacy program which includes policies, standards and controls that help comply with global applicable privacy laws and regulations including the GDPR and CCPA. This program is managed by the privacy team, which is comprised of resources from the Legal team and Risk Management Office, reporting to the General Counsel, and Chief Information Security Office, respectively. The core Privacy team is supported by resources in other organizations such as marketing, sales, information management, and information technology.

Archer's privacy program includes, but is not limited to:

- **Data Governance:** We have a data governance program managed by the Risk Management Office which includes appropriate procedures on ensuring Archer's ability to return, transfer and/or dispose of personal data in a secure manner and in accordance with applicable privacy laws.
- **Data Mapping:** We have mapped the applicable systems and applications that process personal information throughout our organization.
- **Records Retention:** We retain customer data for the sole and exclusive purpose of performing our obligations with our customers for as long as needed to complete our services or as required by applicable laws.
- **Transparency:** We are transparent about our data privacy practice, including providing a privacy notice and obtaining an individual's consent to process their personal information whenever it is collected or processed, or otherwise ensuring that an alternative lawful basis other than consent applies to the processing. We provide information to individuals on the purposes of data processing and categories of personal information.
- **Consumer Privacy Rights:** We give effect to consumer privacy rights and will assist our customers with their privacy related requests (to the extent applicable).
- **Incident Response:** We have a data privacy incident response plan to respond to data privacy complaints and incidents.
- **Privacy by Design:** We design our products/services/solutions to comply with applicable privacy laws and regulations, including the GDPR.
- **Data Minimization:** We have in place procedures and controls which ensure that Archer collects only the minimum amount of personal data required for the specific purpose it is collected for. Further, where applicable, we apply technical and / or

security controls such as data aggregation, deidentification, or anonymization to further advance data minimization objectives.

- **Privacy Impact Assessment (PIA) and Data Protection Impact Assessments (DPIAs):** We conduct PIAs and DPIAs when required to assess the potential impact that data processing activities may have on individuals' rights and freedoms.
- **Third Party Management:** We have in place a third-party risk management program to manage the selection and use of our authorized third parties, including obtaining data privacy contract related assurances. Archer's Procurement process includes a due diligence process, which includes transfer impact assessments in relation to international data transfers.
- **International Data Transfer:** As a large, international organization providing world-class solutions to our customers Archer is required to make international transfers of personal data to maintain its global operations. Archer's operations are designed to meet global data transfer requirements, including EU data transfer requirements, using approved data transfer mechanisms. This includes use of the EU-approved Standard Contractual Clauses, or other variations of Standard Contractual Clauses where applicable (such as the UK International Data Transfer Addendum) as its approved data transfer mechanism, to protect personal data leaving the EU, including applicable data transfer impact assessments. Archer flows down these requirements to our processors and / or sub-processors handling personal data received from the EU on our behalf, and all such processors and / or sub-processors must agree to the approved data transfer mechanism as part of their Data Protection Agreement.
- **Security of Data:** We implement appropriate security, technical and organizational measures to protect individuals and customer's personal and confidential information.
- **Disclosure of Data; Confidentiality:** Data shall only be processed by those with a legitimate need to be involved in the processing, and those involved in processing shall be committed to obligations of confidentiality. We shall never share data with third parties, unless it is in accordance with the applicable Privacy Statement, applicable data protection agreements, or as required by an order of any court, tribunal, regulator, or government agency with competent jurisdiction to which Archer is subject.
- **Recordkeeping:** We maintain a record of our data processing activities.
- **Training and Awareness:** We communicate data privacy awareness and train our team members on the importance of compliance. All Archer team members are responsible for the protection of personal data and may only use personal data for authorized purposes. The Archer Code of Conduct and Privacy Statement clarifies our commitment to protecting the privacy of customer personal information. Because each Archer team member plays a vital role in the protection of personal data, all Archer team members annually undergo a specifically tailored GDPR and Code of Conduct training.

For additional information about Archer's privacy compliance program, please contact the Archer Privacy Office at privacy@archerirm.com.

Please read our Privacy Statement: <https://www.archerirm.com/company/privacy-statement>