

Robinhood - US Personnel Privacy Policy

Last Updated: January 18, 2023

1. **Purpose** - Robinhood Markets Inc. and its affiliates (collectively, “**Robinhood**”) value and respect the privacy of its personnel. This policy describes the privacy practices of Robinhood in connection with the personal data collected about its personnel, as defined below.
2. **Scope** - This policy applies to the processing of personal data by Robinhood relating to any employee, vendor and/or contractor performing work for Robinhood and in the United States. For purposes of this policy, we’ll refer collectively to these individuals as “**personnel.**”
3. **Collection of Personal Data** - Robinhood may collect the following categories of personal data about personnel:
 - Identifiers, such as name and contact information (including phone number, email and physical address) and government-issued identification numbers and the name and contact information of dependents or emergency contacts of employees;
 - Professional or employment-related information and education information submitted in connection with an application to work for Robinhood (such as employment history, work experience, references, referees, professional and academic qualifications);
 - Background report information, including education history and history of residential addresses and record of previous criminal offenses;
 - Visual information, such as photographs or video obtained through CCTV cameras when you enter Robinhood premises or taken at events or otherwise in the course of work;
 - Compensation and tax identification information, including bank account information and tax IDs, stock ownership information (number of shares, dates of purchase and sale), security compliance information, and similar stock option information;
 - Work permit data, including work visa or other information related to work eligibility;
 - Information about use of Robinhood-provisioned computers and use of Robinhood’s network, including via VPN. This information includes identifiers and electronic network activity information, such as IP address and activity logs, including URLs of websites visited, and use of Robinhood’s email accounts and file-sharing services;
 - Performance-related information, including information pertaining to performance on the job and performance evaluations, job duties, title, compensation, and other similar information collected in the course of work for Robinhood;
 - Inferences drawn related to work performance, including abilities and aptitudes;
 - Information received in the course of investigations or complaints, including disciplinary records, employee complaints and other data collected in the course of an investigation;
 - Information obtained when personnel voluntarily beta test Robinhood’s products and services, as further described in the notices provided in connection with those tests.

- Health information, including current health status, any current or prior health conditions, exposure to communicable disease, information about which health benefits an employee selects, medical accommodations and leaves taken for medical reasons;
- Personal data revealing racial or ethnic origin information needed to comply with legal obligations and internal policies relating to diversity and anti-discrimination;
- Disability and veteran status information needed to comply with legal obligations; and
- Trade union membership to provide benefits-related processing assistance.

Robinhood collects the majority of the above information directly from personnel but may also collect information from other sources. For instance, during the recruitment process, Robinhood may request references from third parties and carry out screening and vetting processes using third-party sources. Robinhood also receives information from other personnel (for example, in respect of performance reviews or in the course of conducting a disciplinary investigation). From time to time, Robinhood may receive personal data about personnel from other third parties (for example, customers, business partners or regulatory bodies), medical reports from external professionals, tax authorities, or benefit providers. Additionally, personal data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, CCTV, certain IP address logs and limited, occasional email and chat searching in specific situations), if and to the extent permitted by applicable laws.

4. **Purposes for Processing** - Robinhood processes personal data about personnel for the following lawful purposes:

- as necessary for compliance with a legal obligation, such as tax reporting, adverse impact reporting or to comply with financial and employment regulatory requirements;
- as necessary for the performance of a contract to which the personnel is a party, such as to arrange for payment to personnel that have contracts with Robinhood;
- as necessary in order to protect the vital interests of the personnel or of another natural person, such an emergency where the health or security of personnel is in danger, or to prevent imminent physical harm; and
- for the following legitimate interests:
 - communicating with your during the recruitment process;
 - evaluating and deciding on your recruitment, appointment or promotion;
 - compensation, including employee stock option and employee benefits administration;
 - business travel and relocation administration;
 - employee management, including evaluation, discipline and termination;
 - Investigate employment issues and complaints, and defend against claims and disputes raised by employees or others;
 - training and development;
 - health and safety while in Robinhood facilities;

- o protection of Robinhood’s network and property, including to block dangerous websites, avoid introduction of malware and help prevent unauthorized disclosure or theft of data and intellectual property;
- o to promote Robinhood and improve its product or services;
- o compliance and risk management;
- o for legal, compliance and risk management, including establishing, exercising or defending legal claims; and
- o internal technical and operational support.

5. **Disclosure of Personal Data** - Robinhood shares personal data about its employees as follows:
- with its affiliates and subsidiaries in facilitating planning and resource allocation, policy development, financial reporting and similar legitimate business interests of the Robinhood family of companies;
 - as part of, or during negotiations of, any merger or sale of Robinhood assets;
 - with regulatory authorities or other third parties where Robinhood believes disclosure is required by applicable law and in response to lawful requests by public authorities, including to meet national security or law enforcement requirements;
 - with law enforcement authorities as necessary to protect Robinhood’s corporate assets from theft, fraud or damage.
6. **How We Protect Personal Information.** We take reasonable steps to protect personal information in accordance with applicable laws.
7. **Your Privacy Rights.** Subject to applicable laws, you may have certain rights related to your personal information as described in more detail below. To exercise any of these rights, please fill out this form.
- Right to access: You can access the personal information we store about you, including details of why we are processing it;
 - Right to correct: You have a right to correct personal information about you that is inaccurate, incomplete, or outdated;
 - Right to delete: In certain situations, you can ask that we delete your personal information (where we have no applicable legal requirement to retain and where data is no longer necessary for the purposes for which it was collected);
 - In certain situations, you may also have the right to object to or restrict the use of your personal information, or export your personal information to another company.

If you make a request to exercise the rights referenced above, we will require you to provide certain information for identity verification purposes. You may authorize an agent to make a request to us on your behalf and we will verify the identity of your agent or authorized legal representative by either seeking confirmation from you or documents that establish the agent’s authorization to act on your behalf.

If you wish to exercise these rights, please contact us at HR@robinhood.com.

8. **Contact Details** - Personnel may contact Robinhood with questions at HR@robinhood.com.