



Employee Privacy Policy

Last updated: 1 September 2023

- 1. Purpose** - Robinhood values and respects the privacy of its employees. This policy describes the privacy practices of Robinhood and its affiliates (Robinhood Markets, Robinhood U.K. Ltd, and Robinhood Europe, UAB, legal entity code 306377915, registered at Mėsinių str. 5, Vilnius, the Republic of Lithuania) (collectively, “Robinhood”, “we” or “us”) in connection with the personal information collected about its employees, as defined below.

Any personal data we gather, use, or share about employees is processed in accordance with the Regulation (EU) 2016/679 of the European Parliament, the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (“GDPR”), Law on Legal protection of personal data of the Republic of Lithuania and other applicable legal acts.

- 2. Scope** - This policy explains how we collect and use personal information about you during and after your relationship with us, and your rights.

This policy applies to the processing of personal information by us relating to any employee that performs work for Robinhood (current and former) and who is located in the United Kingdom or a Member State of the European Union. For purposes of this policy, we will refer collectively to those individuals as “employees” or “you”.

- 3. How do we collect your personal information?** We collect the following types of personal information about you:

- **Personal identification data:** name, surname, date of birth (age), government-issued identification numbers;
- **Contact information:** phone number, email and physical address;
- **Emergency contact information:** contact information of dependents or emergency contacts of employees (name, surname, phone number);
- **Information on qualification and experience:** professional or employment-related information and education information (such as employment history, work experience, professional and academic qualifications, education history);
- **Background report information** where permitted by local law, including education history and history of residential addresses;
- **Visual information:** photographs or video obtained through CCTV cameras when you enter Robinhood premises or taken at events or otherwise in the course of work;
- **Payroll and tax identification information:** bank account information, information about remuneration, National Insurance number, payroll records, and tax IDs, stock ownership information (number of shares, dates of purchase and sale), and similar stock option information;

- **Family details:** marital status, number and age of children, information about the child's disability and other information (only to the extent necessary to comply with the requirements of legal acts and to the extent needed to provide guarantees arising from the legal acts);
- **Work permit data:** work visa or other information related to work eligibility;
- **Technical data:** information about your use of Robinhood-provisioned computers and use of Robinhood's network while connected directly or via VPN. This information includes IP address, a log of websites visited, and use of Robinhood's email accounts and file-sharing services. In specific instances, the legal department, with assistance from the IT department, may access the contents of emails through targeted keyword searches, such as in the context of a specific company investigation, to maintain the security of our platforms, response to a data subject's access request, or for compliance with legal requirements (including legal holds);
- **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;
- **Investigation information:** information received in the course of investigations or complaints, including disciplinary records, employee complaints and other data collected in the course of an investigation;
- **Product and service testing information:** information obtained when employees voluntarily beta test Robinhood's products and services, as further described in the notices provided in connection with those tests.

We may also collect and use the following sensitive types of personal information:

- **Health information:** any medical conditions, sickness records, information about health insurance benefits, of which Robinhood has been made aware (such information will be processed in order to comply with health and safety at work requirements arising from legal acts);
- **Data relating to legal requirements:** details of any absences (other than holiday) from work including parental leave and leave taken for medical reasons;
- **Personal information revealing racial or ethnic origin** where permitted by local law, to comply with legal obligations;
- **Disability information,** only to the extent necessary to comply with the requirements of legal acts and to the extent needed to provide guarantees arising from the legal acts;
- **Records of criminal convictions and offences,** only if it is necessary to verify whether the person fulfils the requirements for the performance of job functions or the requirements for a position as laid down by the legal acts; and
- **Trade union membership information,** only to the extent needed to provide guarantees to trade union members arising from the legal acts.

We will only use your sensitive personal information when the law allows us to.

By providing Robinhood with the contact details of his/her family or relatives for the purpose of contacting them in the event of an emergency, an employee confirms that he/she has the right to communicate such details (name and phone number) to Robinhood. Robinhood will not transfer this personal data to anyone and is obligated to retain it until the end of the employment relationship or until it receives an objection to the processing of such personal data. The employee also confirms that he/she has informed the aforementioned person about the disclosure of his/her contact personal data to Robinhood. In the event of a change in circumstances, he/she undertakes to promptly inform Robinhood about any changes in the contact person to be notified during emergencies, including his/her updated contact details, or to request the deletion of the contact person's data.

We collect the majority of the above information directly from employees, but may also collect information from other sources. For instance, during the recruitment process, we may request references from third parties (such as your former employers, colleagues or managers) and carry out screening and vetting processes using third-party sources. We may also collect personal information from recruitment agencies if you are applying through one. Robinhood also receives information from other employees (for example, in respect of performance reviews or in the course of conducting a disciplinary investigation). From time to time, Robinhood may receive personal information about you from other third parties (for example, customers, business partners or regulatory bodies), medical reports from external professionals, tax authorities, or benefit providers. Additionally, personal information 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. How we will use information about you - the table below sets out the purposes of processing your personal data, the legal bases, and the category of processed personal data:

Purpose of personal data processing	Legal basis for personal data processing	Categories of personal data processed
Entering into an employment contract	Taking necessary steps before the conclusion of the contract.	<ul style="list-style-type: none"> ● Personal identification data; ● Contact information; ● Payroll and tax identification information; ● Records of criminal convictions and offences (<i>only if such personal data is necessary to verify whether the employee fulfils the requirements as laid down by the laws</i>); ● Information on qualification and experience; ● Work permit data (<i>to assess the legal basis for working and staying in UK/EEA and to assist in obtaining such basis if the employee does not have it (if the employee is a foreigner)</i>); ● Other provided information.

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Execution of the employment contract and accounting	Performance of the contract.	<ul style="list-style-type: none"> ● Personal identification data; ● Contact information; ● Information on qualification and experience; ● Payroll and tax identification information; ● Performance-related information; ● Data relating to legal requirements; ● Work permit data (<i>to assess the legal basis for working and staying in UK/EEA and to assist in obtaining such basis if the employee does not have it (if the employee is a foreigner)</i>); ● Other provided information.
Proper fulfillment of the obligations (such as tax reporting, provision of guarantees, carrying out health checks) of Robinhood acting as employer which are set forth by the legal acts	Legal obligations.	<ul style="list-style-type: none"> ● Personal identification data; ● Contact information; ● Records of criminal convictions and offences (<i>only if such personal data is necessary to verify whether the employee fulfils the requirements as laid down by the laws</i>); ● Data relating to legal requirements; ● Performance-related information; ● Family details; ● Trade union membership information; ● Disability information; ● Health information; ● Other provided information.
Protection of Robinhood's network and property, including to block dangerous websites, avoid introduction of malware and help prevent unauthorised disclosure or theft of data and intellectual property	Legitimate interest.	<ul style="list-style-type: none"> ● Visual information (<i>CCTV footage</i>); ● Technical data.

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Employee management, including evaluation, discipline, and termination	Performance of the contract.	<ul style="list-style-type: none"> ● Personal identification data; ● Performance-related information; ● Investigation information; ● Information on qualification and experience; ● Payroll and tax identification information.
Business travel and relocation administration	Performance of the contract; Legal obligations.	<ul style="list-style-type: none"> ● Personal identification data; ● Information on qualification and experience; ● Payroll and tax identification information; ● Contact information; ● Records of criminal convictions and offences <i>(only if such personal data is necessary to verify whether the employee fulfils the requirements as laid down by the laws);</i> ● Work permit data <i>(to assess the legal basis for working and staying in UK/EEA and to assist in obtaining such basis if the employee does not have it (if the employee is a foreigner)).</i>
Internal investigation/ investigation of possible violation of work discipline, violation of legal acts	Legitimate interest.	<ul style="list-style-type: none"> ● Personal identification data; ● Information on qualification and experience; ● Technical data; ● Records of criminal convictions and offences <i>(only if such personal data is necessary to verify whether the employee fulfils the requirements as laid down by the laws);</i> ● Performance-related information; ● Investigation information; ● Contact information;

Purpose of personal data processing	Legal basis for personal data processing	Categories of personal data processed
		<ul style="list-style-type: none"> ● Other provided data.
Training and professional development	Performance of the contract; Legitimate interest.	<ul style="list-style-type: none"> ● Personal identification data; ● Contact information; ● Performance-related information; ● Information on qualification and experience.
Promotion of Robinhood and improvement of its products or services	Employee's consent.	<ul style="list-style-type: none"> ● Product and service testing information.
Management of Robinhood's relationships with vendors, customers, and other external stakeholders	Legitimate interest.	<ul style="list-style-type: none"> ● Personal identification data; ● Contact information.
Internal technical and operational support	Legitimate interest.	<ul style="list-style-type: none"> ● Technical data.
Ensuring that the employee's family/relatives are aware of any incidents or accidents at work	Legitimate interest.	<ul style="list-style-type: none"> ● Emergency contact information.
Promotion of Robinhood and community spirit	Employee's consent.	<ul style="list-style-type: none"> ● Visual information (photographs and video footage).
Ensuring the continuity of Robinhood's operations	Legitimate interest.	<ul style="list-style-type: none"> ● Technical data (includes the processing of personal data in an employee's work email after the termination of the employment relationship in order to have access to information important to Robinhood).
Establishing, exercising or defending legal claims	Legitimate interest.	<ul style="list-style-type: none"> ● Personal identification data; ● Information on qualification and experience; ● Payroll and tax identification information;

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		<ul style="list-style-type: none"> ● Contact information; ● Records of criminal convictions and offences <i>(only if such personal data is necessary to verify whether the employee fulfils the requirements as laid down by the laws);</i> ● Work permit data <i>(to assess the legal basis for working and staying in UK/EEA and to assist in obtaining such basis if the employee does not have it (if the employee is a foreigner));</i> ● Visual information (CCTV footage); ● Technical data; ● Performance-related information; ● Investigation information; ● Data relating to legal requirements; ● Performance-related information; ● Trade union membership information.

5. **Information about criminal convictions and offences (if applicable)** - We use a service provider to carry out checks of any criminal convictions and offences as part performing background checks on candidates and employees. As a regulated company, this information enables us to make decisions about recruitment, employment and engagement. We only use information relating to criminal convictions and offences where the law allows us to do so. We may need to periodically repeat background checks during your employment or engagement with Robinhood.

6. **Automated decision-making** - We do not carry out any automated decision-making about you. We will notify you in writing if this position changes.

7. **Sharing your information with third parties** - We may share your personal information as follows:

- with our group companies for their independent purpose in facilitating planning and resource allocation between companies, policy development, financial reporting and similar legitimate business interests of our group of companies;

- with companies that perform services for Robinhood or its employees, including employee benefits providers, recruitment agencies, payment service providers and workforce management providers;
- as part of, or during negotiations of, any merger or sale of company assets;
- State Tax Inspectorate, State Social Insurance Fund Board under the Ministry of Social Security and Labor, other state and municipal institutions, bodies, organizations, and other public administration entities;
- pre-trial investigation bodies, courts, bailiffs, notaries;
- 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; and
- with other third parties for their own purposes with the employee's consent, including to serve as a reference for that employee.

We require third parties to respect the security of your personal information and to treat it in accordance with the law. All our service providers and our group companies are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our service providers to use your personal information for their own purposes.

8. Your rights - Under certain circumstances, by law, you have the right to:

- **Request access** to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to correct any inaccurate or incomplete information we hold about you.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information, subject to applicable regulatory limitations. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party). You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the transfer** of your personal information to another party. In certain cases (such as where our use is based on our contract with you and is undertaken with automated means), you have the right to request your personal information be transferred to you in a structured, commonly used and machine-readable format, so that you can transmit such data to another controller without hindrance.
- **Withdraw consent** to the processing of your personal data. When processing is based on consent, employees have the right to revoke such consent at any time.
- **File a complaint** regarding Robinhood's data protection practices with the relevant supervisory authority. If you are in the UK, please see the ICO contact information at: <https://ico.org.uk/global/contact-us/>. If you are in the EEA, please see this directory: https://edpb.europa.eu/about-edpb/board/members_en.

In the limited circumstances where we rely on your consent to use your information, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the email address provided in paragraph 13 of this policy.

Robinhood shall make all possible efforts to exercise your rights and to answer any questions you may have regarding the information contained in the policy. You may submit a request for the exercise of your rights via the e-mail address provided in paragraph 13 of this policy.

In order to exercise his/her rights, the employee must be successfully identified by Robinhood; therefore, Robinhood may ask you to provide proof of your identity or use other legitimate means of identification.

Robinhood will respond to your request no later than 1 (one) month from the date of receipt of the request. In exceptional cases, where additional time is required, Robinhood will notify you and will have the right to extend the deadline for examination of your request for 2 (two) more months.

Robinhood may refuse to comply with your request only on reasonable grounds if the circumstances specified in the GDPR and other applicable laws have been established by informing you in writing. The answer shall be provided to you via email, unless you will indicate another preferred form.

9. **Retention of personal information** - We will only retain your personal information for as long as is necessary to fulfil the purpose of collection. Once you are no longer an employee and we are no longer required to retain your personal data by law, we will erase or render anonymous personal information in accordance with our data retention policy. Please note that we are required to retain your personal information pursuant to applicable regulatory requirements. The main terms of data retention of the personal data for the purposes specified in this policy are as follows:

We may in some cases store your personal data longer:

- if necessary, to enable us to defend ourselves against claims and exercise our rights to issue claims or lawsuits;
- there are reasonable suspicions of illegal activity;
- personal data is necessary for proper resolution of a dispute or complaint;
- your request for access to your personal data is received;

- on other grounds provided for in the legislation.

- 10. Transfers outside of the UK and EEA** - We may transfer personal information originating from the UK and EEA to the United States and other countries. If we do, we will take steps to afford a similar degree of protection in respect of your personal information by entering into standard contractual clauses with third parties or by other means.
- 11. Data Controller** - Robinhood is the controller of your personal data.
- 12. Contact Details** - You may contact us with questions about this policy or how we handle your personal information by email to privacy_uk@robinhood.com. You have the right to make a complaint at any time to the relevant supervisory authority with respect to data protection. If you are in the UK, please contact the Information Commissioner's Office (ICO) (<https://ico.org.uk/global/contact-us/>). If you are in the EEA, please see this directory: https://edpb.europa.eu/about-edpb/board/members_en.
- 13. Policy updates** - this policy may be changed, amended, or renewed at any time. If Robinhood makes substantial changes to this policy, you will be informed.