Viasat Global Applicant Privacy Notice

Viasat respects your privacy and has safeguards in place to protect the Personal Data about you that we collect or access when you apply for a role at Viasat ("**Personal Data**"). This notice describes how Viasat Inc. and its affiliates ("**we**" or "**Company**" or "**Viasat**") collect, access, use, or disclose (collectively, "**process**") your Personal Data in compliance with applicable laws and regulations and your rights regarding your Personal Data. The data controller of your Personal Data is the Viasat entity that engages you. A current list of all Viasat entities globally can be found in **Attachment A**.

Personal Data We Process

During the application process with the Company, we process Personal Data, including the following (depending on your location):

- **Contact and identification information**, such as your name, email, phone number, address, country of birth, government identification documents (including passports and residency permits) and visa information. We use this information to communicate with you as part of the recruitment process, to determine your eligibility to work, to fulfill our legal obligations, and to conduct and background checks.
- Job application information, such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience, and other information contained in your resume or CV. We may use this information to process job applications, including assessing your suitability for a role and calculate salaries.
- **Results of reference checks and screening**, such as verification of education and employment history. We may use this information to process job applications, including assessing your suitability for a role.
- **Equal opportunities monitoring information**, such as information relating to your gender, veteran status, disability status, and ethnicity.

Purposes and Legal Bases for Processing Your Personal Data

We will only process your Personal Data where we have a lawful basis to do so. We may process your Personal Data for our legitimate interests, namely communicating with you, managing your application, assessing your qualifications for the role you applied for, improving our application process, determining your work eligibility, fulfilling legal obligations, and ensuring we take the necessary steps needed prior to entering into a contract with you.

We may need your consent for some uses of certain Personal Data. Where you have given us consent to collect, use or disclose your Personal Data in a certain way, you may withdraw your consent at any time using the contact information below. Where you have given us your consent to process certain equal opportunities information, such as information relating to your gender and ethnicity, we may anonymize and aggregate this information, and store it in such form that does not identify you, for the purpose of monitoring and improving the application and recruiting process.

Sources of Personal Data

We usually collect your Personal Data directly from you, but there may be situations where we collect this information from other sources, such as from recruiters, executive search firms, referees, social media, reference checks, academic institutions, results of background checks and other third parties during your recruitment.

Transfers of Your Personal Data

The Company is part of a larger group of affiliated entities operating internationally and, therefore, may transfer your Personal Data to its own operations or to other Viasat subsidiary or affiliated companies ("Affiliated Entities") located outside of your country, including to countries where data protection laws and regulations may differ from those in your jurisdiction. The purpose for such transfer includes further

processing as described in this notice and to streamline, harmonize, and increase the quality, timeliness, accuracy, and security of Personal Data across the Affiliated Entities. Personal Data may be transferred to People & Culture-related databases maintained by Viasat, Inc. in the United States, and may be accessed elsewhere. Personal Data in the internal employee directory may also be accessed, within and outside your country, by employees of the Company or an Affiliated Entity, as well as by authorized third parties.

Viasat has executed an Intra-Group Data Transfer Agreement ("Data Transfer Agreement") among the Affiliated Entities to which Personal Data may be transferred that describes the legal, organizational, and technical measures to protect the Personal Data transferred as described in this section, including contractual terms approved by the European Commission.

Managerial, Finance, People & Culture, and technical personnel for the Affiliated Entities in each geographic region may have access to certain Personal Data of applicants located in that geographic region in order to perform the activities described in this notice. Senior management staff and People & Culture personnel of Viasat, Inc. and Affiliated Entities and their designees will have access to Personal Data of applicants on a need-to-know basis.

Disclosures of Personal Data

We may share Personal Data with authorized service providers which process Personal Data on our behalf, some of which may be located outside of your country, where data protection laws and regulations may differ from those in your jurisdiction. We seek to put in place terms similar to the Data Transfer Agreement described in the *Transfers of Personal Data* section and try to ensure practical security measures are applied by any third parties. We do not sell or "share" (as defined by California law) your Personal Data.

We only disclose Personal Data to our service providers and other parties in the following circumstances: (i) to perform services on our behalf, consistent with the purposes described in the *Purposes and Legal Bases for Processing Your Personal Data* section; (ii) when required by law; (iii) in response to a legitimate request by law enforcement; and/or (iv) to seek legal advice or in connection with litigation with a third party; (v) in connection with the sale, purchase, or merger of a business.

Security

We implement appropriate physical, administrative, and technical measures to protect your Personal Data against accidental or unlawful destruction, loss, change or damage. To request information on the specific security measures that we apply to Personal Data, please contact Viasat's Privacy Office at privacy@viasat.com.

Retention

We store the Personal Data we collect about you for no longer than necessary and in accordance with our legal obligations and legitimate business interests. If your application is successful and you become an employee or independent contractor of Viasat, the Personal Data we collect during the application process may be transferred to your personnel file and stored in accordance with our Employee Privacy Notice. If your application is not successful, to the extent that you give us consent to do so, we may also keep your Personal Data for the purpose of considering your application for employment with other Viasat affiliated entities or for other positions with Viasat.

Your Rights

In accordance with the applicable privacy laws in the jurisdiction where you reside, you may have the following rights in respect of your Personal Data that we hold:

• **Right of access**. You may have the right to obtain (i) confirmation of whether, and where, we are processing your Personal Data; (ii) information about the categories of Personal Data we are processing, the purposes for which we process your Personal Data and information as to how we

determine applicable retention periods; (iii) information about the categories of recipients with whom we may share your Personal Data; and (iv) a copy of the Personal Data we hold about you.

- **Right of portability**. You may have the right, in certain circumstances, to receive a copy of the Personal Data you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your Personal Data to another person.
- **Right to rectification**. You may have the right to obtain rectification of any inaccurate or incomplete Personal Data we hold about you without undue delay.
- **Right to erasure**. You may have the right, in some circumstances, to require us to erase your Personal Data without undue delay if the continued processing of that Personal Data is not justified.
- **Right to restriction**. You may have the right, in some circumstances, to require us to limit the purposes for which we process your Personal Data if our continued processing of the Personal Data is not justified, such as where the accuracy of the Personal Data is contested by you.
- **Right to object**. You may have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your Personal Data, and we will assess and inform you if that is the case.

If one of the above rights applies to you under applicable local law, and you wish to exercise one of these rights, please contact <u>privacy@viasat.com</u>. You also have the right to lodge a complaint to the supervisory authority in your country of residence. If we decline your request concerning a right listed above, we will provide you with the reason for the denial.

California Rights

Applicants who are residents of California have the following rights under California law:

(a) Right to Know

You have the right to request that we disclose to you the following information about personal Information we collect from you:

- categories of personal information collected;
- categories of sources of personal information collected;
- the business or commercial purpose for collecting or selling personal information;
- the categories of third parties with whom we share personal information; and
- the specific pieces of personal information we have collected about you during the past 12 months.

You also have a right to know if we have sold or disclosed your personal information for a business purpose during the past 12 months and, if so, the categories of personal information sold or disclosed and the categories of third parties to whom the personal information was sold or disclosed, along with the business or commercial purpose for which the personal information was sold or disclosed.

(b) Right to Request Deletion of Personal Information

You have the right to request the deletion of your personal information collected or maintained by us, subject to certain exceptions permitted by law.

(c) Right to Request Correction of Personal Information

You have the right to request the correction of your personal information collected or maintained by us if any such personal information is inaccurate, subject to certain exceptions permitted by law.

(d) Right to Opt-Out of Sale or Sharing of Personal Information

We do not sell or share personal information that directly identifies you.

(e) Right to Limit use of Sensitive Personal Information

You have the right to request that we limit the use of your "sensitive personal information" to purposes which are necessary to perform tasks which are reasonably expected in the context of the employee-employer

relationship. In this context, "sensitive personal information" has the meaning given under the California Privacy Rights Act.

(e) Right to Non-Discrimination

You have the right not to be treated in a discriminatory manner for exercising your privacy rights. We do not use the fact that you have exercised or requested to exercise any California rights for any purpose other than facilitating a response to your request.

Data Privacy Framework Notice

This Data Privacy Framework ("**DPF**") Notice sets out the privacy principles Viasat follows with respect to transfers of Personal Data from the European Economic Area (**EEA**), the United Kingdom (**UK**) and Switzerland to the United States, including Personal Data we process as part of our Mobility Services.

Viasat, including those affiliates listed in Annex 1 of this Addendum, complies with the EU-U.S. Data Privacy Framework (**EU-U.S. DPF**), the UK Extension to the EU-U.S. DPF (**UK-U.S. DPF**), and the Swiss-U.S. Data Privacy Framework (**Swiss-U.S. DPF**) as set forth by the U.S. Department of Commerce.* We have certified to the U.S. Department of Commerce that we adhere to: (i) the EU-U.S. Data Privacy Framework Principles with regard to the processing of Personal Data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF; and (ii) the Swiss-U.S. Data Privacy Framework Principles with regard to the processing of Personal Data received from Switzerland in reliance on the Swiss-U.S. DPF (collectively, the "**DPF Principles**"). If there is any conflict between the terms in this DPF Notice and the DPF Principles, the DPF Principles shall govern.

*We will not rely on the Swiss-US Data Privacy Framework or the UK Extension to the EU-US Data Privacy Framework until each enters into force, but we adhere to their required commitments in anticipation of their doing so.

To learn more about the DPF, and to view our certification, please visit <u>https://www.dataprivacyframework.gov/</u>.

Types of personal data we collect and use

The types of Personal Data we may receive in the United States, as well as the purposes for which we collect and use it, will vary. You can find the details applicable to your specific information set out in this Privacy Notice.

Your choices

Where appropriate or required to do so, we will give you an opportunity to opt out where Personal Data we control about you is to be disclosed to an independent third party or is to be used for a purpose that is materially different from those set out in the Privacy Notice. If you otherwise wish to limit the use or disclosure of your Personal Data, please contact us using the contact details below.

Transfers to third parties

Information about the types of third parties to which we disclose Personal Data and the purposes for which we do so is described in the Privacy Notice.

If we have received your Personal Data in the United States and subsequently transfer that information to a third party acting as an agent, and such third-party agent processes your Personal Data in a manner inconsistent with the DPF Principles, we will remain liable unless we can prove we are not responsible for the event giving rise to the damage.

Your DPF rights

If you are from the EEA, UK or Switzerland, you have the right to request access to the Personal Data that we hold about you and request that we correct, amend, or delete it if it is inaccurate or processed in violation of the DPF.

If you would like to exercise these rights, please write to us at the contact details provided below. We may request specific information from you to confirm your identity and we will respond to your request in accordance with the DPF Principles and applicable data protection laws.

You may also opt-out of receiving marketing communications from us by writing to us at the contact details provided below or by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you.

Disclosures for national security or law enforcement

Please note that under certain circumstances, we may be required to disclose your Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Viasat publishes annual transparency information reflecting (to the degree permitted by applicable laws) the number and type of data production requests it has received for the corresponding period, the type of data requested and the category of requester.

Enforcement

Viasat's compliance with the with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

Questions or complaints

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, we commit to resolve DPF-related complaints about our collection and use of your Personal Data. EU, UK and Swiss individuals with inquiries or complaints regarding our handling of Personal Data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DP and the Swiss-U.S. DPF should first contact us by email at <u>privacy@viasat.com</u> or in writing at:

Viasat, Inc. Attn: Viasat Privacy Office (Legal Dept.) 901 K Street, NW, Suite 400 Washington, DC 20001

We will investigate and attempt to resolve any DPF-related complaints or disputes within forty-five (45) days of receipt. If you have an unresolved DPF complaint that we have not addressed satisfactorily, we commit to refer unresolved complaints concerning our handling of Personal Data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint for more information or to file a complaint. These services are provided free of charge to you.

You may also have the option to select binding arbitration for the resolution of your complaint under certain circumstances. For further information, please refer to: <u>https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2</u>

Changes to this Notice

It may be necessary for Viasat to make changes to this DPF Notice consistent with the DPF's requirements, so please check this page periodically. We will announce any material changes to this DPF Notice via channels appropriate to our relationship with you.

Annex 1 List of DPF Self-Certified US Entities

The following Viasat controlled US affiliates certify compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce:

Automation Communications Engineering Corporation **ComPetro Communications Holdings LLC ComPetro Communications, LLC** Engreen, Inc. Frontera LLC Intelie, Inc. Landtel Communications, L.L.C. Landtel. Inc. mmWaveBroadband Co. **RBS** Alpha, LLC **RBS Beta, LLC** RigNet EIS, Inc. RigNet Global Holdings S.a.r.l. (US Branch) **RigNet Holdings, LLC** RigNet Newco, Inc. RigNet, Inc. Safety Controls, Inc. THEU, LLC TrellisWare Technologies, Inc. Viasat Carrier Services, Inc. Viasat China Services, Inc. Viasat Global Holdings, LLC Viasat Services Holding Co. Viasat Technologies Limited (US Branch) Viasat Worldwide Limited Viasat, Inc. VParent, Inc. VService, Inc.

Contact

Please contact Viasat's Privacy Office or Data Protection Officer at <u>privacy@viasat.com</u> if you have any questions or concerns regarding this notice or how we process your Personal Data.

Updates

We may update this notice from time to time. When we change this privacy policy in a material way, we will update the "Last Modified" date at the end of this notice.

Last Update: January 12, 2024

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Attachment A – Viasat Affiliated Entities

The Viasat Applicant Privacy Notice applies to personnel employed by all Viasat Affiliated Entities, including:

- Beijing Viasat Science & Technology CO LTD
- Intelie Solucoes em Informatica S.A.
- Munaicom LLP
- Nessco Invsat Limited
- Orgtec S. de R.L. de C.V.
- RigNet Angola, LDA
- RigNet AS
- RigNet Australia Pty Limited
- RigNet LLC
- RigNet Middle East FZE
- RigNet Middle East LLC
- RigNet Pte Ltd
- RigNet Qatar W.L.L.
- RigNet Sdn. Bhd.
- RigNet Servicos de Telecomunicacoes Brasil, Ltda.
- RigNet UK Limited
- RigNet UK Limited
- RigNet(CA), Inc
- RigNet, Inc.
- Viasat Antenna Systems S.A.
- Viasat Australia Pty Limited
- Viasat Brasil Servicos de Comunicacoes Limitada
- Viasat Canada Corp.
- Viasat Europe Limited
- Viasat Germany GmbH
- Viasat Iberica, S.L.
- Viasat Inc.
- Viasat India Pvt.Ltd.
- Viasat Israel Ltd.
- Viasat Italy S.r.l
- Viasat Netherlands B.V.
- Viasat Tecnologia S.A. de C.V.
- Viasat UK Limited
 - Viasat Worldwide Limited