



Employee and Candidate Privacy Notice

This Employee Privacy Notice provides an overview of the personal information that we collect from employees and job applicants and how we may use that data.

What Data is Collected?

Akili collects, uses, and processes Personal Information of its employees and job applicants for human resources, employment, benefit administration, health and safety, and other business-related purposes, and to be legally compliant. Below are the categories of personal information that Akili may collect:

- **Identifiers:** Identifying information, such as your full name, maiden name, gender, date of birth, photo, signature, contact information, such as your home address, telephone numbers, email addresses, emergency contact information, national or state identifiers, driver's license or other state identification, passport and visa information, and immigration status and documentation;
 - Dependent's or other individual's information, such as their full name, address, date of birth, and Social Security number (SSN), including of any related individual covered by your Akili benefits;
- **Protected Classification Data:** Demographic data, such as race, ethnic origin, marital status, disability, and veteran or military status;
- **Professional or Employment Related Information:** Educational and professional background, such as your work history, academic and professional qualifications, educational records, references, interview notes, Akili employment details, such as your job title, position, hire dates, compensation, performance and disciplinary records, and vacation, sick leave records, Health and safety information, such as health conditions (only if relevant to your employment), job restrictions, workplace illness and injury information, health insurance policy information, profile or summary about an employee's preferences, characteristics, attitudes, abilities, and aptitudes;
- **Financial information:** such as banking details, tax information, payroll information, and withholdings;
- **Internet or other electronic network activity information:** Information Systems (IS) information, such as your emails, messages, search history, browsing history, login information, any files and data on your Akili equipment, IP addresses on Akili's information systems and networks, and Metadata from any person device you connect to an Akili account or system;
- **Biometric information:** such as fingerprints or facial recognition, but only if you enable those features on your Akili equipment;
- **Geolocation data:** such as time and physical location related to use of an internet website, application, device, or physical access to an Akili office location;
- **Sensory or surveillance information:** such as meeting or call (including video conference) monitoring or recording, employment related questionnaires/surveys, or COVID-19 related questionnaire responses.



We may also collect certain demographic data that qualifies as sensitive personal data, such as race, ethnicity, sexual orientation, and disability to help us understand the diversity of our workforce. This information, when collected, is generally done so on a voluntary basis with consent, and employee and job applicants are not required to provide this information, unless it is necessary for us to collect such information to comply with our legal obligations.

Sources from Which the Company Collects this Data

Akili may collect the above data from the following sources:

- The employee/applicant directly,
- Prior employers,
- Background check companies, and
- IT systems.

How Do We Use Your Data?

Akili collects or processes the Personal Information above to use or disclose only for the following purposes (unless you give us permission for other purposes):

- Comply with all applicable laws and regulations;
- Conduct background checks if necessary and with an employee's consent;
- Manage your employment relationship with us, including, for example:
 - onboarding processes;
 - timekeeping, payroll, and expense report administration;
 - employee benefits administration;
 - employee training and development requirements;
 - the creation, maintenance, and security of your online employee accounts;
 - reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
 - workers' compensation claims management;
 - employee job performance, including goals and performance reviews, promotions, discipline, and termination;
 - Sending company related items to you directly without involvement of a third party; and
 - other human resources purposes.
- Manage and monitor employee access to company facilities, equipment, and systems;
- Conduct internal audits and workplace investigations;
- Investigate potential breaches of and enforce compliance with Akili policies and procedures;
- Engage in corporate transactions requiring review of employee records, such as for evaluating investments in Akili or potential mergers and acquisitions of Akili;
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance;
- Perform internal and confidential workforce analytics, data analytics, and benchmarking;



- Administer and maintain Akili's operations, including for safety purposes;
- For Akili or partner marketing purposes, but only with the employee's advance consent and further option to opt out; and
- Exercise or defend the legal rights of Akili and its employees, affiliates, customers, contractors, and agents.

Sensitive personal information collected through the employment or applicant process is not used for any purposes inconsistent with the original purpose for which it was collected without proper consent and notice.

Who Do We Share Your Data With?

We will only share your data as is necessary. It may be shared internally with select employees who need the data to perform their job functions. It may also be shared with service providers we have engaged such as a benefits administrator, SaaS providers, or a payroll support provider.

We may also disclose your personal data to a third party under the following circumstances:

- if we in good faith believe we are compelled by any applicable law, regulation, legal process, or government authority;
- where necessary to exercise, establish, or defend legal rights, including to enforce our agreements and policies;
- to protect Akili's rights or property;
- to respond to an emergency which we believe in good faith requires us to disclose data to prevent harm;
- Security monitoring and incident response; and/or
- with your consent.

Akili will not sell or share any data collected as part of the employment or job applicant process.

We may also confidentially use or confidentially disclose your information in the event of a corporate change in control resulting from, for example, a merger, sale of assets, or bankruptcy, solely for the purpose of effectuating any such corporate change in control, and any such use or disclosure will continue to be subject to the provisions of this Privacy Notice.

What Rights Do You Have with Your Data?

You may request access to your data by contacting peopleops@akiliinteractive.com or legal@akiliinteractive.com. You have the following rights with respect to your personal data:

- Right to update the personal data Akili has collected about you;
- Right to correct the personal data Akili has collected about you;
- Right to access the personal data Akili has collected about you, if you are from California or from any other state where state law so requires;
- Right to request personal data be deleted, if you are from California or from any other state where state law so requires; and
- Right to non-discrimination for exercising any of these rights.



You are permitted to use an authorized agent to submit requests on your behalf if we can verify the authorized agent's authority to act on your behalf (such as pursuant to a power of attorney or if you have separately verified your identity or the relevant authorization with us). You may submit a request via an authorized agent using the contact methods described above.

Please note that Akili may retain certain of your data for applicable legal, regulatory, or other reasons that are permitted by applicable data privacy laws and regulations.

Record Retention

We maintain your information only for the amount of time it is needed to fulfill the legitimate purpose for which it was collected.

Changes to our Employee Privacy Notice

If we materially change this Employee Privacy Notice, we will notify you by posting a notice on our website or notifying you via the email address you provided. Your continued employment or participation in job application processes following any such notification of changes will mean that you acknowledge and agree to the revised Employee Privacy Notice.

Questions

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact peopleops@akiliinteractive.com or legal@akiliinteractive.com.