



Employee, Applicant, and Contractor Privacy Policy

Effective date: May 18, 2023

1. Overview

This Employee, Applicant, and Contractor¹ Privacy Policy (the “**Privacy Policy**”) contains policies and procedures to be followed by JAKKS Pacific, Inc. and its present or future affiliates and subsidiaries including but not limited to Disguise, JAKKS Pacific (UK), JAKKS Europe, JAKKS Pacific (Canada), JAKKS Pacific (Germany), JAKKS Pacific (Italy), and JKP Holdings Mexico (“**JAKKS**,” the “**Company**,” “**we**,” “**us**,” or “**our**”) related to collection and use of personal information of an applicant, an employee, a Company officer or director, or a contractor (collectively referred to this in Privacy Policy as the “**Personnel**,” “**you**,” or “**your**”).

We want you to understand how and why we collect “**Personal Information**,” which includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. You should have no expectation of privacy when using technology provided by JAKKS or whenever accessing JAKKS technology resources or information. We are committed to protecting the privacy of all of our Personnel, and we take administrative, technical, and physical safeguards to protect your Personal Information from unauthorized access, misuse, accidental loss, or alteration.

Residents of California: see the attached California Privacy Notice Addendum (which supplements this Privacy Policy) for a full list of the disclosures and rights available to you under California law. Residents of United Kingdom, Europe, or the EEA: see the attached GDPR Privacy Notice, which supplements this Privacy Policy.

2. What Information Do We Collect?

The chart below identifies categories of Personal Information we may collect or process and the specific reasons for which we process each category of information. For more details on why we process each category of information, see Purposes of Collection section, below.

We may not collect all categories of Personal Information for each individual. For example, if the collection of Personal Information relates to a specific benefit that is not generally available, we would only collect that Personal Information from you if you are eligible for and enroll in the benefit. When we collect a category of Personal Information, we also may not collect each specific example listed.

The specific pieces of information we collect about you may vary due to the nature of your position, role, and benefits. Service providers, such as recruiting firms, application processors, and background check providers, may collect information on our behalf to facilitate the employment relationship.

See the flowing chart for categories and examples of information, and the reasons for collection.

Categories	Examples	Reasons for Collection
Identifiers and Categories listed under the California Customer Records Statute.	Name, postal address, internet protocol address or related unique identifiers, account name, email address, telephone number, social security number, driver's license or state ID number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • Administer the Employee Relationship; • Comply with Legal Obligations; • Facilitate Communications and Efficiency; • Provide Benefits; • Ensure Safety of Employees, Contractors, Facilities, and Property • Ensure Security of Our Systems
Protected classification characteristics	Age (over 40), gender, ethnicity, race, sexual orientation, religious or philosophical beliefs.	<ul style="list-style-type: none"> • Administer the Employee Relationship; • Comply with Legal Obligations • Facilitate Communications and Efficiency; • Provide Benefits; • Ensure Safety of Employees, Contractors, Facilities, and Property
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<ul style="list-style-type: none"> • Facilitate Communications and Efficiency; • Provide Benefits; • Ensure Security of Our Systems
Geolocation data.	Physical location or movements.	<ul style="list-style-type: none"> • Facilitate Communications and Efficiency; • Provide Benefits; • Ensure Safety of Employees, Contractors, Facilities, and Property
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information such as security camera footage.	<ul style="list-style-type: none"> • Administer the Employee Relationship; • Comply with Legal Obligations • Facilitate Communications and Efficiency; • Provide Benefits; • Ensure Safety of Employees, Contractors, Facilities, and Property
Professional or employment-related information.	Current or past job history, resume information, current employment information, performance evaluations, wage and benefit information.	<ul style="list-style-type: none"> • Administer the Employee Relationship; • Comply with Legal Obligations; • Ensure Safety of Employees, Contractors, Facilities, and Property
Non-public education information	School records or transcripts	<ul style="list-style-type: none"> • Administer employee/contractor relationship • Comply with legal obligations • Provide benefits • Ensure safety & protect facilities & property
Sensitive Personal Information	Social Security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access credentials; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; or contents of mail, email, and text messages where JAKKS is not the intended recipient of the communication. Biometric information processed to uniquely identify a consumer, such as a photograph.	<ul style="list-style-type: none"> • Administer the Employee Relationship; • Provide Benefits; • Ensure Safety of Employees, Contractors, Facilities, and Property

3. Purposes of Collection

(a) ***Administering the Employment/Contractor Relationship:*** We keep and process Personal Information for traditional employment and contractor engagement purposes, use this information for management and administrative uses, and only disclose it with others who have a need-to-know such information. We keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, while you are working for us, and after your employment or contract has ended. This includes using Personal Information to enable us to comply with any legal requirements associated with an employee or contractor relationship, to administer payroll, provide you with benefits, ensure your safety, comply with an employment or service contract, and demonstrate our commitment to equal employment opportunity and fair employment practices.

(b) ***Compliance with Legal Obligations:*** In certain situations, we may need to collect and process your Personal Information to comply with our legal obligations. This may include:

- Tracking demographic information to confirm compliance with equal opportunity and non-discrimination policies and requirements;
- Processing information relating to your health, which could include reasons for absence, doctor's reports, and notes, to comply with obligations under applicable employment and safety/health laws;
- Verification of employment;
- Maintenance of tax records and unemployment or disability insurance coverage;
- Processing information regarding certifications and qualifications for your role or position;
- Processing information regarding participation in employment related activities about which we are required to retain a record; and/or
- Processing information relevant to any alleged violations of the law or JAKKS' internal standards or in compliance with a subpoena or other valid legal or regulatory request.

(c) ***Facilitate Communications and Efficiency:*** JAKKS uses various tools and platforms that enable you to more easily communicate with other Personnel and to more efficiently access and disclose various types of work product. Some tools may also allow Personnel to disclose information via social media or other channels, including information relating to job opportunities. These tools and platforms may collect and disclose contact information and company profile pictures; log certain preferences and actions; collect your geolocation; and create user profiles that allow Personnel and JAKKS to track their efficiency and performance. We may also have access to communications sent using JAKKS' systems and devices.

(d) ***Provide Benefits:*** We may offer a variety of benefits depending on your relationship with us. We, or our service providers, collect any information necessary to provide these benefits, as described in the chart above. If Employees take advantage of other benefits, such as fitness-related benefits, we may also collect additional biometric and sensory information relating to these activities, as would be required to effectuate these benefits. When you participate in certain benefits programs, we may also generate a log of your activity, track internet and other network activity, and develop a user profile to provide those programs to you in a manner tailored to your preferences. All benefits may not be available to all Personnel, and the Company will only collect Personal Information to provide a benefit if you are eligible for and enrolled in that benefit. You should take care to read the specific terms applicable to any particular mobile application or benefits program to understand the specific pieces of information collected.

(e) ***Ensure the Safety of Employees, Contractors, Facilities, and Property:*** We collect various categories of Personal Information to ensure the safety of Personnel, facilities and property. This information helps verify the identity of Personnel in specific facilities and ensure the security of facilities and Company property. It may

also include the collection of certain health, vaccination, or screening information when individuals enter our facilities. Additionally, we may process certain categories of Personal Information to ensure the safety and security of our electronic systems and devices. This includes monitoring our systems for suspicious or fraudulent activity and other forms of illegal conduct. This monitoring is to ensure the safety and security of our systems and the confidential information that is entrusted to us.

4. Updates to the Privacy Policy

This Privacy Policy may be revised occasionally, and we will notify you of any material changes by prominently posting any updated notice on www.jakks.com under the Employee, Applicant, and Contractor Privacy Policy. We may be subject to certain laws and regulations relating to privacy and information security in more than one jurisdiction in which Personnel reside. If any term, covenant, condition, or provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid, void, or unenforceable, we intend that the scope of Privacy Policy rights and obligations be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable, without in any way affecting, impairing, or invalidating the remaining provisions.

5. Individual Rights Requests

If you reside in a jurisdiction providing you with individual rights regarding your Personal Information, you may exercise those rights as described in this Policy and its relevant Addenda or by contacting us as described in Section 8, below. For example, Canadian residents may submit access and correction requests by email at privacy@jakks.net or phone at 1+424.268.9409.

6. Information Stored in the United States

JAKKS is based in the United States, and so any information provided to us may be transferred to and stored in the United States. By providing your Personal Information to us, you consent to the transfer of such information to the United States.

7. Questions

If you have any questions about this Privacy Policy, contact privacy@jakks.net or 424.268.9409 or 877.875.2557.

**California Privacy Notice
for Employees, Applicants, and Contractors
Residing in California**

Effective Date: May 18, 2023.

This California Privacy Notice addresses how we process the Personal Information of applicants for employment, employees, and contractors who are residents of California. This Notice supplements our underlying Employee, Applicant, and Contractor Privacy Policy to ensure compliance with the law.

If you are an Employee, Applicant, or Contractor residing in California, you have rights regarding how we collect and process your Personal Information under the California Consumer Privacy Act (“CCPA”), as modified by the California Privacy Rights Act (“CPRA”). This Addendum will provide you with a summary of the categories of information we collect, the reasons that we collect each category of information, information regarding how we may disclose your Personal Information with third parties, and information regarding your rights under the CPRA. If you have any questions, please contact us via the Questions section, below.

- 1. Information We Collect:** In the preceding 12 months, we have collected the categories of Personal Information identified above in Section 3 of the Employee, Applicant, and Contractor Privacy Notice for the purposes identified in Section 4 of the Employee, Applicant, and Contractor Privacy Notice.

- 2. Sources of Personal Information:** We collect the majority of the information that we process about you directly from you, through the applications or forms you submit and the information you provide at the time of hiring. In addition to the information that you provide to us, we may collect information about you from third parties, such as information from third parties that provide accreditation, educational institutions, benefits providers, and vendors that provide background checks or related information. Finally, we may automatically collect, store, or otherwise process information about you as you use our tools, systems, or resources.

- 3. How Your Personal Information Is Disclosed:** In the preceding 12 months, we have disclosed the following categories of employment related information to service providers, who are necessary for facilitating the employment relationship and providing you with benefits - Identifiers, Personal, Classification, Internet, Professional, and Sensitive Information.

We enter into written contracts with our service providers to ensure the privacy and security of your Personal Information. Under these contracts, we restrict the access to and processing of your Personal Information to that which is necessary for the purpose of the disclosure.

In certain circumstances, we may provide you with opportunities to sign up for certain benefits programs that involve the disclosure of your Personal Information to third party benefits providers. Any such program will be purely optional and based on your opt-in participation. Any service providers used to provide these benefits will provide you a notice of their information management practices at the time of data collection.

In the preceding 12 months, we have not sold or shared employment related Personal Information to third parties for money or anything of monetary value.

We do not collect, process, or disclose sensitive Personal Information, as defined under the CPRA, for purposes other than those specifically authorized in Section 7027 of the CPRA regulations. We may collect certain information regarding the family members of Personnel for the purposes of providing benefits services. In some circumstances, this may include information about individuals under 16 years of age. In no circumstances do we sell or share information regarding children under 16 years of age.

4. Individual Rights: The CPRA provides residents of California with a series of rights regarding the processing of their Personal Information. This section explains the scope of these rights and outlines how you may exercise them.

(a) *Right to Know About Personal Information Collected, Disclosed, Shared, or Sold:* You have the right to know whether we are processing your Personal Information and to request that we disclose the Personal Information we collect, use, and disclose to third parties. There are two types of Rights to Know requests you can make: an Abbreviated Request and a Specific Information Request.

If you make a Right to Know (Abbreviated Request), you will receive the following information about you:

1. Categories of Personal Information collected, sold, or shared;
2. Categories of sources from which Personal Information is collected;
3. Categories of third parties to whom the information is sold, shared, or disclosed;
4. Business or commercial purpose for collecting, sharing, or selling Personal Information;
5. Categories of Personal Information disclosed for a business purpose and categories of persons to whom it was disclosed for a business purpose.

If you make a Right to Know (Specific Pieces of Information Request), you will receive specific pieces of Personal Information collected about you. We will provide this information to you free of charge, unless we determine that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period. We will provide this information to you in a portable and (to the extent technically feasible) readily usable format that allows you to transmit the data without hindrance. Exceptions to the Right to Know may apply, and we will state in our response if an exception applies.

(b) *Right of Deletion:* You have the right to request that we and our service providers delete Personal Information we have collected about you. This right is subject to certain exceptions and does not require us to delete information that we are otherwise required to hold under applicable laws. We will state in our response if an exception applies.

(c) *Right of Correction:* You have the right to request that we correct inaccuracies in any Personal Information that we collect or process about you upon receipt of a verifiable request. When submitting a correction request, please provide all reasonably necessary information to confirm the accuracy of the correction request. This right is subject to certain exceptions, and we will state in our response if an exception applies.

(d) *Right to Non-Discrimination:* We will not retaliate against any employee, applicant for employment, or independent contractor for exercising your CPRA rights. We also will not discriminate against you by: denying goods or services to you; charging different prices or rates for benefits, goods, or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting you will receive a different price or rate for goods or services or a different level or quality of goods or services.

(e) *Submitting Requests:* To submit a request, email us at privacy@jakks.net or call 424.268.9409 or 877.875.2557. We will respond to these requests, if applicable, within 45 days of receipt of the request and without undue delay. If we need to extend this period, we will notify you of the delay and explain the reasonably necessary justifications for our delay. We will provide responses to your requests free of charge unless exclusions apply, which we will identify in our response.

(f) *Verifying Requests:* To ensure the protection of your Personal Information, we must verify that the individual submitting a request is the contractor or employee to whom the request relates prior to processing the request. To verify your identity, we may request up to three pieces of Personal Information about you to

compare against our records. You will not be required to create an account with us to submit a verifiable request. However, you may be required to access an existing account to the extent accessing the account is necessary. We will only use Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. We reserve the right to take additional steps as necessary to verify your identity where we have reason to believe a request is fraudulent.

(g) **Authorized Agents:** California residents may submit rights requests through the use of an Authorized Agent registered with the California Secretary of State to act on your behalf. If you choose to use an Authorized Agent, we require that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with us. Failure to do so may result in us denying your request.

5. **Data Retention:** We retain the information collected pursuant to this Privacy Policy during the period of active employment of the employee or service relationship of the contractor, as well as during the post-employment period only as long as the Personal Information is required to serve its original purpose or as directed by applicable legislation or regulation. Such post-employment retention may be as long as 7 years in certain cases, as required by law or best practice. Personal Information that is no longer needed for its stated purpose will be destroyed, erased, or made anonymous.

We take appropriate measures to ensure that your Personal Information is processed and disposed of in a manner that maintains its confidentiality. All Personal Information disposal procedures, including the disposal of computerized data storage devices, are designed to ensure the complete destruction of Personal Information and eliminate the risk of subsequent unauthorized access or disclosure.

6. **Changes to This Privacy Policy:** We reserve the right to make changes to this Privacy Policy from time to time, and if we do so, we will notify you of any material changes by prominently posting any updated notice on www.jakks.com under the Employee, Applicant, and Contractor Privacy Policy. Any changes to this Policy will become effective as of the effective date of the new policy. You can review this notice or consult the Privacy Policy at any time. We also may be subject to certain laws and regulations relating to privacy and information security in more than one jurisdiction. If any term, covenant, condition, or provision of this Notice is held by a court of competent jurisdiction to be invalid, void, or unenforceable, it is the intent of this Notice that the scope of the rights and obligations of the Notice be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable and the remainder of the provisions of the Notice will in no way be affected, impaired, or invalidated as a result.

7. **Questions:** If you have questions regarding this Privacy Policy, please contact privacy@jakks.net or 424.268.9409 or 877.875.2557.

GDPR Addendum for Applicants, Employees in the EU, UK, and EEA

Effective Date: 18 May 2023

If you are a resident of the European Union (“EU”), the European Economic Area (“EEA”) or the United Kingdom (“UK”), you may have additional rights under the EU and UK General Data Protection Regulations (“GDPR”). This addendum addresses your rights under the GDPR, the legal basis we may use to process your information, how we process special categories of Personal Information, our use of automated decision-making, and transfers of personal data outside of the EEA and UK.

1. Your Rights As They Pertain to Your Personal Information: You are entitled by law to access, correct, amend, or delete Personal Information about you that we hold. Below is a summary of these rights. Please note that these rights are not absolute and certain exemptions may apply to specific requests that you may submit to us. To exercise any of these rights, please refer to Questions section below to contact us.

- **Right to access:** You have the right to ask us for copies of your Personal Information. In some instances, the Company may be required to limit access to Personal Information to comply with statutory or regulatory requirements. However, the Company will make all reasonable efforts to comply with the Employee’s request for access and correction to the extent of what is allowed by statute or regulation. The Company may refuse access to portions of the Personal Information of an Employee where it is found to contain Personal Information pertaining to another Employee.
- **Right to rectification:** We will make reasonable efforts to ensure that your Personal Information is at all times complete and accurate for its stated purpose. However, should you have reason to believe that the information we possess is inaccurate, you have the right to ask us to rectify such information. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure:** You have the right to ask us to erase your personal data in certain circumstances, such as when it is no longer needed for the purpose for which it was collected.
- **Right to restrict processing:** You have the right to ask us to restrict the processing of your information in certain circumstances, such as where you contest the accuracy of the information that we hold about you while we verify its accuracy.
- **Right to object to processing:** You have the right to object to our processing of your Personal Information if it is based on our legitimate interest or your consent.
- **Right to data portability:** This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organization to another.
- **Right to lodge a complaint with the supervisory authority:** If you believe your rights under the GDPR have been violated, the GDPR gives you the right to file a complaint with your supervisory authority. These authorities include the Data Protection Authorities of the EU, the Swiss Federal Data Protection and Information Commissioner, and the UK Information Commissioner’s Office. We will endeavor to respond promptly to any reasonable request.

2. Legal Bases for Processing Your Personal Information: We will only process your Personal Information when we have a lawful basis for doing so. The legal basis for collecting and using the Personal Information will depend on the Personal Information concerned and the specific context in which we collect it. Generally, we will process your Personal Information to perform the employment contract with you, to comply with a legal obligation, based on your consent, and based on our legitimate interest.

- **To Perform our Contract.** As your employer, we need to keep and process Personal Information about you for normal employment purposes. The Personal Information we hold and process will be used for our management and administrative uses only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, while you are working for us, at the time when your employment ends and after you have left. This includes using Personal Information to enable us to comply with the employment contract and to comply with any legal requirements (associated with the employment or service

relationship). This Personal Information we collect from you is necessary for the management of the employment or service relationship. If you do not provide this information, we may be unable to comply with our obligations in some circumstances and may not be able to employ you.

- **To Enable Us to Comply With a Legal Obligation.** We may process your Personal Information to comply with legal obligations to which we are subject, including any requirement to produce audited accounts, any legal obligation to share information with law enforcement agencies or public or governmental authorities, and to comply with legal process. It may also include processing your demographic information in order to monitor compliance with equal opportunity and non-discrimination policies and processing information related to your health to comply with applicable laws and our occupational health and safety obligations.
- **Needed to Exercise or Defend Legal Claims.** If you bring a claim against us or we bring a claim against you, we may process your Personal Information in relation to that claim. We may also store your Personal Information to defend against or prepare for any potential future claim, in accordance with our internal recordkeeping policies and procedures.
- **Consent.** We may process your Personal Information based on your consent, such as when you provide your information to use in connection with voluntary benefits programs you may participate in during your employment with us. You have the right to withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.
- **Our Legitimate Interests.** We may process your Personal Information if doing so is necessary for our legitimate interests relating to our relationship with you, and your rights as an individual do not override those legitimate interests. For example, our legitimate interests include but are not limited to when we process your Personal Information for activities to prevent fraud, increase network and information security, identify usage trends, and determine and improve the effectiveness of our systems and business.

3. **Special Categories of Personal Information:** As described above, we may collect certain information that reveals your racial or ethnic origin, religious or philosophical beliefs, trade union membership, biometric data, health related data, and data concerning a person's sex life or sexual orientation. We will only process this data where required by applicable law, where you provide your express consent, or where needed for our performance of the employment contract with you. Where we process special categories of Personal Information on the basis of your consent, you are not required to provide this information. If you do not provide consent, it will not affect your application or employment. We will not make the information available to any staff outside our recruitment team, including hiring managers, in a way that can identify you. Any information you provide will be used to produce and monitor equal opportunity statistics.

4. **Automated Decision-Making:** You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making. There will always be human intervention into decisions based on automated processing, including automated analytics, testing, and profiling. If this position changes, or there is a need and lawful base to do so, we will notify you in writing.

5. **Transferring Information Outside the EU or UK:** As an international company based in the United States, we may store or transfer the Personal Information we collect about you to JAKKS entities/systems in the U.S.A. We ensure that appropriate safeguards are in place to provide adequate levels of protection for your Personal Information as required by applicable data protection laws. All transfers outside the EU and UK not made to countries which are considered by the European Commission to provide an adequate level of protection of Personal Information are safeguarded with an agreement based on Standard Contractual Clauses approved by the European Commission or other such mechanisms that have been recognized and approved by the relevant authorities from time to time. If you have questions about the transfer, please see the "Questions" section below.

6. **Questions:** If you have questions regarding this Privacy Policy, please contact privacy@jakks.net or call 1+424.268.9409 or 1+877.875.2557.