



## Employee Privacy Notice

Last Updated: May 14, 2025

This employee privacy notice ("**Privacy Notice**") sets out how Credo Technology Group Holding Ltd and its subsidiaries/affiliates (collectively, "Credo," "**we**," "**us**" or "**our**") collects, uses, discloses and otherwise processes your personal information<sup>1</sup> in connection with your employment at Credo, engagement to provide services to Credo or application for a job with Credo. This Privacy Notice applies to the handling of your personal information as a current or former employee, contractor, consultant, advisor, intern (whether paid or unpaid), volunteer or job applicant (collectively, "**employee(s)**" or "**you**"), only to the extent you are acting in such role. This Privacy Notice also applies to personal information provided to, or otherwise collected or processed by, us about employees' relatives or others that is used for emergency contact or benefits administration purposes. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

We may revise and update this Privacy Notice from time to time to reflect changes in applicable law or our data handling practices. A copy of the new version of this Privacy Notice will be made available to you and we will indicate at the top of the new version when it was last updated.

This Privacy Notice is intended to cover Credo's employees globally, except where a local, jurisdiction-specific employee privacy notice is provided, so some of the practices described in this Privacy Notice may not apply to you. This Privacy Notice may be supplemented with a local, jurisdiction-specific notice where required by applicable law or to reflect local or regional practices. In the event of any conflict between the terms of this Privacy Notice and the terms of any such local employee privacy notice provided to you by Credo or our subsidiary that directly employs you (or which otherwise has or had the direct relationship with you), the terms of such local employee privacy notice will govern and control.

### Categories of Personal Information We Collect

We collect the following categories of personal information:

- **Personal identifiers**, such as your name, date of birth, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license or resident identification number, passport number and other similar identifiers.
- **Educational and professional background**, such as your work history, academic and professional qualifications, educational records, references and interview notes.
- **Employment details**, such as your job title, position, hire or engagement dates, compensation, hours, other terms and conditions of employment, performance and disciplinary records and vacation and sick leave records.

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<sup>1</sup> For the purposes of this Privacy Notice, the term "personal information" has the meaning given to such term (or to terms of similar intent, such as "personal data") under applicable law, as and to the extent applicable to your rights and our obligations with respect to such information, including (as and to the extent applicable) "personal information" as defined under the CCPA and the CPRA.



- **Financial information**, such as banking details, tax information, payroll information, and withholdings.
- **Internet and email usage information when using Credo’s devices, networks, systems, hardware, software, websites, applications, or other services or information technology**, such as browsing history, search history, the content, date and time of your email correspondence, browser type and version, relevant plug-ins, operating systems and platform, time zone settings Internet service provider and other information regarding your interaction with an Internet website, application, or advertisement.
- **Sensory data**, such as audio recordings of customer service calls, other calls related to our general operations and badge data and security footage.
- **Inferences drawn from other personal information**, including any information referenced above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

The collection of personal information is mandatory in order for us to administer our relationship with you. Failure to provide or allow us to process mandatory personal information may affect our ability to accomplish the purposes stated in this Privacy Notice.

Personal information excludes anonymous or de-identified data that is not associated with a particular individual.

See below for information about how we collect, use, disclose and otherwise process special categories of personal information.

### **Special Categories of Personal Information We Collect**

We may collect the following special categories of personal information, which may be considered “sensitive” under certain applicable laws, when you voluntarily provide it for the following legitimate business purposes or as otherwise permitted by applicable law and described below in “How We Use Your Personal Information.” We will not use this information to make hiring decisions.

- Your social security number, driver’s license or resident identification number and passport number.
- Your financial account information, and security and access codes or passwords that would permit access to medical, financial or other legally protected information.
- Geolocation data, such as precise physical location or movements and travel patterns.
- Data concerning your sex, marital status, religion, veteran status, familial status, race, disability, gender identity and creed for the purpose of ensuring meaningful equal opportunity monitoring and reporting and to administer benefits.
- Data concerning your health, such as health conditions (if relevant to your employment/engagement), job restrictions, workplace illness and injury information and health insurance policy information, for the purpose of complying with health and safety obligations in the workplace, to make appropriate workplace accommodations, as part of sickness absence monitoring and to administer benefits.



- Biometric information, such as physiological and biological characteristics, that can be used singly or in combination with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, fingerprints and palm vein scanning, from which an identifier template can be extracted.

We also may collect such special categories of personal information from an employees' dependents, relatives or others for the purpose of benefits and leave administration.

This Privacy Notice, and the practices described herein, applies equally to our collection, use, disclosure and other processing of such special categories of personal information.

### **Sources of Personal Information**

We, and service providers working on our behalf, collect personal information you voluntarily provide to us during the job application process or as part of your relationship with us.

We, and such service providers, also may automatically collect certain personal information from you when you access our premises or use our devices, networks, systems, hardware, software, websites, applications, or other services or information technology, view our emails or otherwise engage with us through a computer or mobile device.

We may combine personal information you voluntarily provide, or that we or our service providers collect as described above, with information we collect from other sources, such as:

- recruiters;
- prior employers and professional references;
- educational institutions;
- pre-employment/engagement screening and background check services;
- credentialing and licensing organizations;
- publicly available sources, such as public social media profiles on LinkedIn, X or Facebook;
- and
- other sources as directed by you.

### **How We Use Your Personal Information**

We may process your personal information: (i) on the basis of your consent; (ii) to protect your vital interests; (iii) where necessary for the performance of our contract with you; (iv) in order to comply with a legal obligation; and/or (v) where such processing is in our legitimate business interests, which include, but are not limited to:

- **Recruitment of Employees and Processing and Managing Job Applications:** We may use your personal information to process your job application, create an applicant profile, evaluate your qualifications, schedule and conduct interviews and communicate with you.
- **Conducting Pre-Employment/Engagement Screening and Background Checks:** We may use your personal information to conduct screening and background checks.
- **Compensation and Expense Management:** We may use your personal information to conduct payroll processing, salary administration, expense reimbursement, manage



Credo's corporate credit card program and for other compensation purposes such as determining bonuses, equity and other forms of employee compensation.

- **Benefits Administration:** We may use your personal information to administer benefits we provide, such as medical, dental, vision, disability insurance, retirement benefits and other benefit programs.
- **General Human Resources Management:** We may use your personal information to provide general HR management services, including managing on-boarding, termination and separation, travel administration and return-to-work screening (including any medical screening as required or permitted by applicable law).
- **Training and Professional Development:** We may use your personal information to provide training and to assist with professional licensing and development.
- **Internal Employment Purposes:** We may use your personal information to conduct internal investigations, conduct surveys, resolve disputes, prevent or detect fraud or security incidents, conduct performance reviews, enforce our policies and code of conduct, protect the rights and safety of personnel or others and manage whistleblower programs.
- **IT Systems Operation and Security:** We may use your personal information to enable the effective operation and security of our devices, networks, systems, hardware, software, websites, applications, and other services and information technology (including, without limitation, email and phone systems), and ensure that they are used in accordance with our policies and procedures.
- **Compliance with Legal Requirements and Enforcement of Our Legal Rights:** We may use your personal information to comply with applicable laws, regulations and legal processes (such as responding to subpoenas or court orders), and to respond to legal claims, resolve disputes, enforce our legal rights contained in employment or other contracts, comply with legal or regulatory recordkeeping requirements and comply with reporting obligations under applicable law.

We do not use or otherwise process your personal information, including special categories of personal information, for purposes of automated decision-making, including profiling.

### **Disclosure of Personal Information**

We may share your personal information for the business purposes described in this Privacy Notice with the following parties:

- **Affiliates and Subsidiaries:** We may share your personal information with or among our affiliates and subsidiaries.
- **Service Providers:** We may share your personal information with service providers, such as recruiters, screening services, third-party benefits administrators, payroll processors, background check providers, survey administrators, IT and data hosting providers and others. We generally require all of our third-party service providers to implement appropriate security measures designed to protect your personal information consistent with our policies. We typically require such service providers to use your personal information only for specified purposes in accordance with our instructions.



- **Governmental Authorities:** As required by applicable law or legal process, we may share your personal information with federal or state regulatory agencies, law enforcement, courts and other governmental authorities.
- **Professional Advisors:** We may share your personal information with our professional advisors, such as auditors, accountants, consultants, placement agents and law firms.
- **Real Estate Companies:** Upon your request, we may share your personal information with real estate companies and mortgage providers that you are dealing with for the purposes of verifying your relationship with us.
- **Parties Involved with Business Transfers or Other Corporate Activities:** We may share your personal information with third parties in the event we sell or transfer all or a portion of our business or assets or engage in other corporate transactions (including in the event of a merger, acquisition, joint venture, reorganization, financing, divestiture, dissolution or liquidation).
- **Existing and Prospective Investors:** We may share certain aspects of your personal information (e.g., prior work experience, educational background) with third parties that are existing or prospective investors in the funds that we advise, or advisors of such existing or prospective investors.
- **Marketing and Advertising Partners:** We may share your personal information with third-party online and other marketing partners or permit these partners to collect information from you directly.
- **Other Parties at Your Request:** We may share your personal information for additional purposes pursuant to your request.

We do not sell or otherwise disclose your personal information to any third parties for monetary or other consideration or share your personal information with third parties for purposes of cross-context behavioral advertising.

### **Personal Information of Third Parties**

Where you disclose personal information of third parties to us, you warrant that you have obtained the prior consent of such third parties for us to collect, use, disclose, and otherwise process such personal information for the relevant purpose for which you made the disclosure or as was notified to you at the relevant time and/or such other purposes as described in the “How We Use Your Personal Information” section above, in accordance with any applicable laws, regulations and/or guidelines.

## **Cross-Border Data Transfers**

The recipients of your personal information pursuant to this Privacy Notice may be located in the United States or elsewhere, and certain of such recipients' respective countries may have different data privacy laws and protections than your home country. We may transfer your personal information outside of your home country, including to affiliates and subsidiaries in other countries, for the purposes set out in this Privacy Notice. Any transfer of your personal information to recipients in a third country will be made subject to appropriate safeguards or applicable derogations provided for under applicable law. Further information on such safeguards or derogations can be obtained by contacting us using one of the methods detailed below.

## **Data Security**

We maintain policies and procedures designed to protect your personal information in accordance with our normal procedures and applicable law. We also maintain physical, electronic and administrative measures designed to safeguard your personal information and prevent unauthorized access thereto; however, we do not and cannot guarantee the security of your personal information. In addition, our policies limit access to your personal information to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

## **Data Retention**

Personal information processed by us shall be kept for at least as long as is required for the purpose for which it was collected and otherwise in order to meet our statutory, regulatory, or other obligations under applicable law.

Further details of our data protection policies and procedures are available in our retention policy, information about which you can request by contacting us. When determining the relevant retention periods, we take into account factors, including, but not limited to, the following:

- our contractual relationship with you;
- legal obligations under applicable law to retain personal information for a certain period of time;
- the amount, nature and sensitivity of your personal information;
- the potential risk of harm from unauthorized use or disclosure of your personal information;
- statutes of limitation under applicable law;
- (potential) disputes; and
- guidelines issued by relevant supervisory authorities.

Under some circumstances, we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

## **Additional Information for Individuals Whose Personal Information is Subject to the CCPA/CPRA**



Residents of the state of California have certain rights with respect to their personal information<sup>2</sup> pursuant to the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act of 2020 (“CPRA”) and as further described in this section.

Under the CCPA and the CPRA, you may be entitled to:

- request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive your request and confirm your identity, we will disclose to you the categories and specific pieces of personal information we collect about you (and, if applicable, sell or otherwise disclose to a third party and the categories of such third parties), the sources from which such personal information was collected, and the business purpose for collecting, selling or disclosing such personal information;
- opt out of the sale of your personal information or the sharing of such personal information with third parties for purposes of cross-context behavioral advertising. As noted above, we do not currently sell your personal information or share your personal information with third parties for such purposes;
- request that we delete the personal information we have collected about you;
- request that we correct any inaccurate personal information we have collected about you; and
- request that we limit the use or disclosure of sensitive personal information we have collected about you.

You have the right to appoint an authorized agent to exercise these rights on your behalf. To exercise the aforementioned rights, if and as applicable, you or your authorized agent may contact us using one of the methods detailed below. To exercise any of these rights, we may need to request specific information, such as your name, address and email address, from you or your authorized agent to help us confirm your identity and ensure your right to exercise these rights.

These rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you request that we delete the personal information we have collected about you, the CCPA and the CPRA permit us to deny such request and retain your personal information to the extent necessary to manage our relationship with you or comply with legal requirements.

In accordance with our policies and procedures, we will not discriminate or retaliate against you if you choose to exercise any of your rights under the CCPA or CPRA.

#### **Additional Information for Individuals Whose Personal Data is Subject to the Data Privacy Laws of Other Jurisdictions**

To the extent that data privacy laws other than the CCPA/CPRA apply to our collection, use, disclosure or other processing of your personal information, you may have certain rights with respect to such personal information (including, depending on the jurisdiction, rights that may be comparable to those of California residents, as described above). In such case, we will follow such other applicable data privacy laws with respect to your rights, and the description herein of the rights of California residents, as and to the extent applicable, shall be considered notice of your

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<sup>2</sup> For the purposes of this section, “personal information” has the meaning given to such term in the CCPA and the CPRA.





rights to the extent that we are required to provide you with such notice under such applicable data privacy laws.

### **How to Contact Us**

The corporate entity that employs or otherwise engages you is the controller of your personal information for the purposes hereof. If you have any questions or concerns regarding this Privacy Notice or the collection of your personal information, please contact us at [LegalNotices@credosemi.com](mailto:LegalNotices@credosemi.com) or at the following toll-free phone number 1-888-636-1090. If you have a disability and need access to this policy in an alternative format, please contact us using the information above.