

# **CT Orthopaedics Employee and Applicant Privacy Policy**



**Effective Date: April 22, 2026**

**Last Updated: April 22, 2026**

This Employee and Applicant Privacy Policy (the “Policy”) describes the practices of CT Orthopaedics (“ Company” or “us” or “we”) regarding the information that is collected by the Company through its application portal (“Careers Site”) or otherwise in connection with your application for a job or internship with us and all other sources of information collected in regard to your employment or potential employment with the Company.

## **1. CATEGORIES OF INFORMATION WE COLLECT THAT YOU PROVIDE FOR YOUR APPLICATION**

We may collect the following information from you in connection with your application through the Careers Site or later in the application or hiring process: Name, e-mail address, mobile number, work authorization status, resume, profile information (e.g., work experience, education, skills, licenses & certifications, and memberships), professional and other work-related licenses, permits and certifications, references, other information relevant to the position for which you apply, and any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards, or professional memberships).

If you do not provide sufficient information, we may be unable to consider your employment application.

However, please avoid submitting the following information that may qualify as sensitive information under applicable law, except where such information is legally required: information on race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings, and veteran status.

If the personal information you provide contains details of the information referenced in the preceding paragraph or your job evaluations or educational records, you authorize us to handle such details for the purposes of your job application.

Any information you submit to the Company, including through the Careers Site, must be true, complete and not misleading. Misleading or false information may lead to immediate dismissal for cause, once hired, or the elimination for consideration.

It is your responsibility to ensure that information you submit does not violate any third party’s rights.

If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

## **2. USE OF INFORMATION / LEGAL BASIS**

We collect and process information about you from various sources for the following reasons:

- a) Because you voluntarily provide this information;
- b) Because this information is necessary to take steps at your request prior to entering into an employment or internship;

- c) Because this information is of particular importance to us and we have a specific legitimate interest under law to process it;
- d) To comply with a legal obligation;
- e) Because this information is necessary to continue your employment or provide benefits for which you are eligible; or
- f) Where necessary to protect the vital interests of any person.

The information that you submit to the Company, including the Careers Site, will be used for our personnel recruitment, management, and planning purposes, as permitted by law, including:

- To process your application;
- To assess your capabilities and qualifications for a job;
- To perform drug testing, if required for the position;
- To respond to your inquiries and communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies;
- To comply with or monitor compliance with any applicable law or regulation;
- To conduct background checks if we offer you a position;
- To consider eligibility for benefits; and
- To preserve our other legitimate interests, for example, for our administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business.

The information about you will be added to our candidate database. If you do not wish us to do this, please contact [careers@ct-ortho.com](mailto:careers@ct-ortho.com).

If we hire you, personal information we collect in connection with your application may be incorporated into our human resources system and may be used to manage the new-hire process; any such information may become part of your employee file and may be used for other employment-related purposes.

We may also use the information as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to protect our legal rights and operations or the rights, privacy, safety or property, and/or of us, you, or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain.

### **3. DISCLOSURE OF PERSONAL INFORMATION**

We may share personal information with vendors that are involved in the Company's hiring process. We will make the information available to personnel with a business need to know the information, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying.

We may share personal information with third-party service providers who provide services such as hosting and operating the Careers Site, recruiting assistance, background check processing, and similar services.

We also may share personal information as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to protect our legal rights and operations or the rights, privacy, safety or property, and/or of us, you, or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain.

We may transfer information in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

#### **4. DATA RETENTION**

We keep your personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include (i) for as long as we have an ongoing relationship with you (such as employment); as required by a legal obligation to which we are subject; or as advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

We may remove personal information for inactive accounts, subject to any applicable legal or regulatory obligations. Furthermore, we may delete personal information about you (including your CV/résumé) from our database at any time and without providing any reason. Therefore, please retain your own copy of the personal information provided to us.

#### **5. PASSIVE INFORMATION COLLECTION: COOKIES AND TRACKING TECHNOLOGY**

When you visit the Careers Site, we collect certain information by automated means. Cookies are small text files that websites send to your computer or other internet-connected device to uniquely identify your browser or to store information or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a customized experience and enable us to detect certain kinds of fraud. In many cases, you can manage cookie preferences and opt-out of having cookies and other data collection technologies used by adjusting the settings on your browser. All browsers are different, so visit the “help” section of your browser to learn about cookie preferences and other privacy settings that may be available. Further details on automated tracking can be found on the Company’s website.

In many cases, the information we collect is only used in a non-identifiable way, without reference to personal information. For example, we use information we collect about website users to optimize the Careers Site and to understand website traffic patterns. In some cases, we associate the information we collect with your personal information. This Policy applies to the information when we associate it with your personal information.

Although the Careers Site currently does not have a mechanism to recognize the various web browser Do Not Track signals, we do offer individuals choices to manage their preferences that are provided in the previous sections above. The Careers Site does not collect personal information about an individual’s online activities over time and across different websites when a consumer uses the Careers Site. To learn more about browser tracking signals and Do Not Track please visit <http://www.allaboutdnt.org/>. We use Google Analytics as a third-party vendor. For information on how Google Analytics uses data, please visit “How Google uses data when you use our partners

sites or apps”, located at <http://bit.ly/2jXZ13Y>. We also use Pendo as a third-party vendor. For information on how Pendo uses data, please visit <https://www.pendo.io/privacypolicy/>.

## **6. ACCESS AND CORRECTION**

If you register on the Careers Site, you may access, review, and change your personal information stored therein by logging into the Careers Site and updating your account information. However, if you have authenticated your login via a mobile number or email address, such information cannot be updated in the same login session.

We encourage you to promptly update your personal information if it changes or is inaccurate.

Apart from information contained in your profile, where permitted by applicable law, you may request (i) access to personal information we collect, (ii) its modification or suppression, (iii) that we restrict its processing, (iv) that we cease using it (objection right); and/or (v) that we transfer personal information to you or another organization in a structured, commonly used and machine-readable format (right to data portability). Please email us at [careers@ct-ortho.com](mailto:careers@ct-ortho.com) or contact us at 2416 Whitney Avenue, 3<sup>rd</sup> Floor, Hamden, CT 06518 with any such requests.

For your protection, we may only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that certain personal information may be exempt from such access, correction, or suppression rights pursuant to local data protection laws.

## **7. SECURITY**

We use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the “Contact Us” section below.

We hereby disclaim, as far as permitted by local laws, any liability for us and our affiliates and contractors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to our Careers Site.

## **8. LINKS TO THIRD-PARTY WEBSITES**

The Careers Site may contain links to other websites. This Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by us. We encourage you to read the legal notices posted on those sites, including their privacy policies.

## **9. LAW APPLICABLE TO JOB APPLICATION**

This Careers Site is operated from Connecticut. Accordingly, any personal information you submit to the Careers Site will collect in Connecticut and will be subject to Connecticut laws.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

## **10. ABOUT CHILDREN**

The Careers Site is not intended for individuals under the age of 18.

## **11. CHANGES TO THE POLICY**

We reserve the right to amend this Policy at any time in order to address future developments, the Careers Site, changes in the Company's HR policies or benefits, or changes in industry or legal trends. We will post the revised Policy on the Careers Site or announce the change on the home page of the Careers Site.

You can determine when the Policy was revised by referring to the "Last Updated" legend on the top of this Policy.

Any changes will become effective upon the posting of the revised Policy on the Careers Site. By continuing to use the Careers Site following such changes, you will be deemed to have agreed to such changes.

If you do not agree with the terms of this Policy, in whole or part, you can choose to not continue to use the Careers Site.

## **12. CONTACT US**

If you have questions or requests, please feel free to contact us at [careers@ct-ortho.com](mailto:careers@ct-ortho.com) or 2416 Whitney Avenue, 3<sup>rd</sup> Floor, Hamden, CT 06518.