# Northrop Grumman Scholarship America Privacy Notice

We at Northrop Grumman ("we", "us", "our", "Northrop Grumman") respect your concerns about privacy. This Privacy Notice describes the information practices of Northrop Grumman with regard to the processing of employee personal information for the purpose of submitting scholarship applications on behalf of the children of Northrop Grumman employees. Click on one of the links below to jump to the listed section:

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#### **Information We Maintain**

We collect certain information about you, including personal information about you and your child to facilitate a scholarship application for your child. Personal information collected for this purpose includes the following:

- Employee forename and surname
- Employee Sector Affiliation
- Employee MyID
- Employee child applicant forename and surname

The above information is required to carry out the process described below in "How We Use the Information We Maintain." Failure to provide this information will interfere with our ability to submit your scholarship application.

## How We Use the Information We Maintain

We use the personal information we collect to apply for available scholarships on behalf of your child and for the announcement of scholarship recipients.

# Legal Ground for Our Use of the Information

By signing and dating the Scholarship America application form, you provide your consent that the information provided by you on behalf of your child (as parent or guardian of the child), can be processed by Northrop Grumman and its affiliates for your child's scholarship application.

While you can withdraw consent for this processing at any time (see *Your Rights* section below), please be advised that withdrawal of consent may limit what is provided to your child in terms of applying for scholarships. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

#### **Information We Share**

We do not disclose personal about you, except as described in this Privacy Notice. Subject to applicable law, we may share among our affiliates and subsidiaries the personal information we process for the purposes specified in this Privacy Notice.

We may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government entities, and (iii) in connection with an investigation of suspected or actual criminal offenses. We also may transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

We share your personal information with Scholarship America who acts as a processor for Northrop Grumman in processing you and your child's data for scholarship applications. Scholarship America is located in the United States. Your data is transferred compliantly under the European Commission's Standard Contractual Clauses, as incorporated into Northrop Grumman's controller to processor agreement with Scholarship America, as described in the "Data Transfers" section below.

If you have any questions regarding the sharing of your personal information, please contact us as indicated in the "How to Contact Us" section below.

## **Your Rights**

Subject to applicable law, you have the right to withdraw consent, the right to request access to and rectification or erasure of your personal information, or the restriction of our use of your personal information, or to object to such a use. Subject to applicable law, you also have the right to receive, in a structured, commonly used and machine-readable format, the personal information about you that you provided to us for your Scholarship America application, and to transmit this information to a third party organization. You can exercise these rights by contacting us as indicated in the "How to Contact Us" section below. In addition, you have the right to make a complaint with a data protection authority.

#### **Data Transfers**

If you are located in the EEA, the United Kingdom or Switzerland, we comply with applicable legal requirements by protecting your Employee Information when it is transferred to countries

outside of the EEA, the United Kingdom or Switzerland that have not been recognized by the European Commission as providing an adequate level of data protection. The steps we take include concluding data transfer agreements incorporating the European Commission's Standard Contractual Clauses with the relevant data recipient or ensuring that the data recipient has implemented Binding Corporate Rules. You may obtain a copy of these agreements by contacting us as indicated in the "Contact Us" Section below.

Northrop Grumman and its U.S. subsidiaries are certified under the EU-U.S. and Swiss-U.S. Privacy Shield frameworks developed by the U.S. Department of Commerce and the European Commission regarding the transfer of Employee Information from the EEA, the United Kingdom or Switzerland to the U.S. To learn more about the Privacy Shield program, and to view our certification, please visit <a href="https://www.privacyshield.gov/list">https://www.privacyshield.gov/list</a>. We no longer rely on the EU-U.S. or Swiss-U.S. Privacy Shield framework to transfer personal information from the EEA, the United Kingdom or Switzerland to the U.S.

If you are located outside the EEA, the United Kingdom or Switzerland, you acknowledge that we may transfer the information to countries in which the laws may not offer the same level of data protection as the laws of your own country.

#### **How We Protect Your Information**

We maintain appropriate technical and organizational safeguards designed to protect your personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We also require our service providers with whom we share your personal information (see the "Information We Share" section above) to do the same.

## **Data Retention**

Your personal information will be retained as long as necessary to achieve the purposes described above in "How We Use the Information We Maintain". It will typically be retained for one year, unless we (or our service provider(s)) have to retain the information for a longer period to be able to run regular blocking/deletion routines, to take into account the applicable statute of limitation period, or to comply with a legal retention obligation.

## **How to Contact Us**

If you would like to exercise your rights, or if you have any questions or comments about this Privacy Notice or the processing of personal information, please contact <a href="mailto:privacy@euro.NorthropGrumman.com">privacy@euro.NorthropGrumman.com</a>.