

California Job Applicant Privacy Notice for California Job Applicants

Effective Date: July 2024

Arctic Glacier U.S.A., Inc. (“Arctic Glacier”, “we”, “us”, or “our”) provides this California Job Applicant Privacy Notice (“Notice”) to notify you of our privacy practices as required by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (“CPRA”).

Arctic Glacier collects and processes your personal information, including sensitive personal information, for human resources, employment, and business-related purposes. We are committed to properly handling the personal information collected or processed in connection with your job application with us.

We may collect personal information, including sensitive personal information, from you in a variety of different situations, including, but not limited to directly from you (e.g., from forms you complete when you apply for employment), and indirectly from you (e.g., from third parties, such as background checks, references, entities that post job openings on our behalf). Arctic Glacier may collect the following categories of personal information:

| Personal Information Category | Examples | Disclosed for a Business Purpose? | Categories of Third Parties to Whom the Personal Information is Disclosed |
|--|--|-----------------------------------|---|
| Identifiers | Your name, contact information, gender, date of birth, signature, Social Security number, driver’s license or state identification numbers. | Yes | To the extent permitted by applicable law, your personal information may be disclosed to the following categories of third parties: <ul style="list-style-type: none"> • to our affiliates for the purposes described in this Notice • to our third-party service providers who provide services such as those who help manage the recruitment and onboarding process, provide applicant tracking systems and recruiting software, conduct background checks, and provide data storage or hosting services • to a third party in the event of any direct or indirect reorganization, including |
| California Customer Records employment and personal information | Your name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, education, current employment, employment history. | Yes | |
| Protected classification characteristics under California or federal law | Age (40 years or older), race, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including | Yes | |

| Personal Information Category | Examples | Disclosed for a Business Purpose? | Categories of Third Parties to Whom the Personal Information is Disclosed |
|--|---|-----------------------------------|---|
| | gender, pregnancy or childbirth and related medical conditions), or military and veteran status. | | 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) <ul style="list-style-type: none"> to a third party where we either aggregate, anonymize, de-identify or otherwise strip data of all personally identifiable characteristics to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others |
| Professional or employment-related information | Employment application information (work history, academic and professional qualifications, educational records, references, and interview notes, background check, drug testing results, work authorization. | Yes | |
| Non-public education information | Education records, degrees and vocational certifications obtained. | Yes | |

Sensitive personal information is a subtype of personal information consisting of specific information categories. We may collect or process information that falls with the sensitive personal information categories listed in the table below.

| Sensitive Personal Information Category | Examples | Disclosed for a Business Purpose | Categories of Third Parties to Whom the Personal Information is Disclosed |
|---|---|----------------------------------|---|
| Identifiers | Social security number, driver's license, state identification card, passport and visa information, and immigration status and documentation. | Yes | To the extent permitted by applicable law, your sensitive personal information may be disclosed to the following categories of third parties: |

| Sensitive Personal Information Category | Examples | Disclosed for a Business Purpose | Categories of Third Parties to Whom the Personal Information is Disclosed |
|---|-------------------|----------------------------------|---|
| Racial or ethnic origin or union membership | | Yes | <ul style="list-style-type: none"> • to our affiliates for the purposes described in this Notice • to our third-party service providers who provide services such as those who help manage the recruitment and onboarding process, provide applicant tracking systems and recruiting software, conduct background checks, and provide data storage or hosting services • to a third party in the event of any direct or indirect reorganization, including 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) • to a third party where we either aggregate, anonymize, de-identify or otherwise strip data of all personally identifiable characteristics • to comply with legal obligations or valid legal processes such as search warrants, |
| Citizenship or immigration information | | Yes | |
| Health information | Job restrictions. | Yes | |

| Sensitive Personal Information Category | Examples | Disclosed for a Business Purpose | Categories of Third Parties to Whom the Personal Information is Disclosed |
|---|----------|----------------------------------|--|
| | | | subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others |

Arctic Glacier does not use or disclose the above sensitive personal information for any purpose other than those permitted under the CPRA.

Arctic Glacier retains each category of personal information, including sensitive personal information, listed above only for as long as necessary to fulfill the business purpose for which it was collected or as required by law. Once it is no longer useful for the business purpose or applicable law, it is either anonymized or deleted. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, and whether we can achieve those purposes through other means, and the applicable legal requirements.

Arctic Glacier may use the personal information, including the sensitive personal information, listed above for business purposes related to your employment or application for employment. Those purposes may include:

- to meet the purpose for which you provided the information
- to contact you
- to evaluate your qualifications and suitability for employment
- to administer pre-employment tests and training activity
- to complete the onboarding process
- to conduct criminal and other background checks on applicants
- to manage the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision of benefits and maintenance of emergency contact information
- to prepare and maintain legally required records, such as I-9 forms, EEO-1 forms and affirmative action plans
- to maintain information regarding training and other employment history
- to administer benefits
- to process requests
- to provide support
- to ensure a safe working environment
- to meet tax obligations

- to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity
- to comply with company policies and applicable law or regulations.

CPRA Rights

As a California resident, you have the following rights under the CPRA:

Right to Know: You have the right to request that we disclose certain information to you about our collection and use of certain personal information, including sensitive personal information, about you as described below:

- The specific pieces of personal information collected;
- The categories of personal information collected;
- The categories of sources from whom the personal information is collected;
- The purpose for collecting, selling or sharing the personal information;
- The categories of third parties with whom we have disclosed the personal information;
- The categories of personal information that we have sold or shared, and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each third party to whom the personal information was sold or shared;
- The categories of personal information that we disclosed for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

Right to Delete: You have the right to request that we delete your personal information, subject to certain exceptions.

Right to Correct Inaccurate Personal Information: You have the right to request that we correct inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

Right to Opt-Out of Sale or Sharing: We do not sell or share (as such terms are defined under the CPRA) your personal information. Arctic Glacier does not have actual knowledge that it sells or shares such information of children under the age of sixteen.

Right to Limit the Use and Disclosure of Sensitive Personal Information for Certain Purposes: As stated above, we do not use or disclose your sensitive personal information for any purpose other than those permitted under the CPRA.

Freedom from Discrimination: You have the right not to receive discriminatory treatment for exercising your rights above, including not to be retaliated against for exercising such rights. To exercise the rights above, you must submit a verifiable request to us by calling us at 1-800-580-8480 or submitting a request online at <https://arcticglacier.com/arctic-glacier-employee-privacy-policy/>

We may need you to provide additional information to verify your request, such as providing certain data elements so that we can confirm they match the personal information already maintained by us. We will not use this additional information for anything other than handling your request. You may designate an authorized agent to make a request in certain circumstances on your behalf by providing the agent with signed permission to do so. We endeavor to respond to all such requests within forty-five (45) days, although there may be a brief delay in processing a request while we verify that the request is valid and originates from you as opposed to an unauthorized third party. If we require more time, we will inform you of the reason and extension period in writing.

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 HRAdmin@arcticglacier.com.

The Effective Date of this Notice is set forth at the top of this page. We may change this Notice from time to time in our discretion. Changes will be posted to this page. We encourage you to return to this page frequently so that you are aware of our current Notice.