

California Job Applicant Privacy Policy

Last updated: December 1, 2023

This Job Applicant Privacy Policy (“Applicant Policy” or “Policy”) explains how “K” Line America, Inc., and its affiliates (“KAM”, “we”, “us”, or “our”) process the personal information of job applicants who are California residents. This Applicant Policy applies to personal information we collect in person, through the mail, on the [KAM Career Portal](#), which is available for those who wish to search and apply for open job positions at KAM, and all of our careers websites and job postings that include a link to this Applicant Policy (collectively, the “Careers Sites”). Applications and other materials submitted through the KAM Career Portal are first collected and processed by a third-party vendor.

This Applicant Policy describes the types of personal information we collect on our Careers Sites, how we may use that information, with whom we may share it, your choices and rights you have regarding our use of your personal information, and how you can assert your rights. If you have any questions or need to access this Applicant Policy in an alternative format due to having a disability, please contact us via the methods identified in the “Contact Us” section below.

The term “personal information” in this Applicant Policy refers to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. This includes information that you provide to us, information that is collected about you automatically, and information we obtain about you from third parties. It does not include aggregated or anonymized information that is maintained in a form that is not capable of being associated with you.

This Policy may be updated periodically to reflect changes in our practices or relevant laws. We will post a prominent notice on the site and/or send you an email to notify you of any significant changes to our Policy and indicate at the top of the notice when it was updated.

Please note that this Applicant Policy also does not cover any information that we may collect about you in your capacity as a customer with us, which are addressed in our [Privacy Policy](#).

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1. Personal Information We Collect

When you apply for a position with us, we request your contact information, a resume, and, depending upon the position, certain additional information. The categories of personal information we collect about you may vary based upon the position for which you are applying. The information in this Applicant Policy is intended to provide an overall description of our collection of information about Applicants.

The CCPA has grouped specific types of personal information into categories; below, we have set forth the type of personal information that we collect from you as set forth per the categories established in the CCPA.

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers.
- **Internet or other electronic network activity information:** if you apply online, we may collect information about your browsing history on the job site and internet or other electronic network activity information, including, but not limited to, the referring URL or website that led you to our website.
- **Professional or employment-related information:** such as your employment history and any similar information set forth in your resume.
- **Education information:** information about education history or background as set forth in your resume.
- **Protected Classifications:** characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, and citizenship status. (Optional).
- **Audio/Visual Data:** If we conduct your interview by video, we will collect video images from those interviews; we may but do not typically record or store interview footage. If you work at or visit one of those locations, your image and actions may be recorded. We do not typically associate this information with you or your employment record.
- **Sensitive personal information:** We may collect your social security number to do a background check.

2. Why We Collect Personal Information

We may use the above categories of personal information for the following purposes:

- **Recruiting, Hiring and Managing, and Evaluating Applicants:** To review, assess, recruit, consider or otherwise manage applicants, candidates and job applications, including:
 - Scheduling and conducting interviews
 - Identifying candidates, including by working with external recruiters
 - Reviewing, assessing and verifying information provided, to conduct criminal and background checks, and to otherwise screen or evaluate Applicants' qualifications, suitability and relevant characteristics
 - Extending offers, negotiating the terms of offers, and assessing salary and compensation matters
 - Satisfying legal and regulatory obligations

- Communicating with Applicants or their designee (e.g., recruiter) regarding their applications and about other similar position(s) for which they may be interested
- Maintaining Applicant personal information for future consideration
- In support of our equal opportunity employment policy and practices
- **Security and Monitoring:** In order to monitor and secure our resources, network, premises and assets, including:
 - Monitoring for, preventing and investigating suspected or alleged misconduct or violations of work rules
 - Monitoring for, preventing investigating, and responding to security and privacy incidents
 - Providing and managing access to physical and technical access controls
 - Monitoring activities, access and use to ensure the security and functioning of our systems and assets
 - Securing our offices, premises and physical assets, including through the use of electronic access systems and video monitoring
- **Auditing, Accounting and Corporate Governance:** Relating to financial, tax and accounting audits, and audits and assessments of our business operations, security controls, financial controls, or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.
- **M&A and Other Business Transactions:** For purposes of planning, due diligence and implementation of commercial transactions, for example mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions.
- **Defending and Protecting Rights:** In order to protect and defend our rights and interests and those of third parties, including to manage and respond to employee and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.
- **Compliance with Applicable Legal Obligations:** Relating to compliance with applicable legal obligations (such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, Social security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance.

3. Why We Share Your Personal Information

We will not sell, share, or otherwise disclose your personal information for purposes unrelated to those detailed in this Applicant Policy without your prior consent. To that end, we will take reasonable precautions to allow access to your personal information to only our employees, agents, contractors, or similar entities to the extent necessary for the purposes set out in this privacy policy. We may share your personal information in the following ways:

- **Between Affiliated Entities.** Your personal information may be disclosed among our various affiliated entities for the purposes set out in this Applicant Policy.
- **To Third-Party Service Providers.**
 - In the course of our recruitment activities, we may make certain personal information available to third parties who provide services to us to support those

activities. We will only do so where such a transfer is necessary, and in accordance with applicable data protection rules. In such instances, your personal information may be made available to the following types of service providers:

- Companies that provide or help to operate our applicant database;
- Companies that help with relocation support services;
- Companies that provide payroll support services;
- Companies that help with verification/background checking/drug testing services;
- Cloud services companies that provide hosting, data storage, and other services pursuant to standard terms and conditions that may be non-negotiable;
- Companies that help us improve our job applicant websites. These third parties may provide data points including how much time you spend on specific pages, which links you choose to click, and data that helps determine user preferences. This information enables us to build and maintain our services with user feedback. These third parties may use cookies and other technologies to collect data on your behavior and devices such as the device type, browser information, and preferred language;
- Companies that help us provide targeted advertising to potential job applicants;
- Companies that help manage candidates' recruitment life cycle via cloud-based recruitment software solutions (known as applicant tracking systems)

4. Your Rights

If you are a California resident, you have the following rights:

- **Right to Know/Access.** You may have the right to obtain a copy, or a list of categories of the personal information that we hold about you, as well as other supplementary information, such as the purposes of processing, the categories of entities to whom we disclose your personal information, and the specific pieces of personal information we hold about you.
- **Right to Correct.** You have the right to correct any of your personal information in our records and systems. You may request us to rectify, correct or update any of your personal information held by us that is inaccurate.
- **Right to Opt-out of Sale or Sharing.** You may have the right to opt-out of: (i) the sale of your personal information; and (ii) the sharing of your personal information for targeted advertising. We neither sell nor share your personal information for targeted advertising.
- **Right to Delete.** Under certain circumstances, you have the right to request that we delete the personal information that we hold about you. This right is not absolute, and we may refuse such a request if there are compelling legitimate grounds for keeping your personal information, for legitimate purposes, or as required by law. In addition, in the event your deletion request is honored, we may retain a record of your deletion as required under applicable law

- **Right to Limit Use and Disclosure of Sensitive Personal Information.** To the extent your sensitive personal information is used to infer characteristics about you, you may have the right to object to our processing of your sensitive personal information. We do not process any sensitive personal information to infer characteristics about you.
- **Right to Opt-Out of Automated Decision-making.** You have the right not to be subject to a decision which significantly impact your rights that is based solely on automated processing (where a decision is taken about you using an electronic system without human involvement). No decision will be made by us about you solely on the basis of automated decision making which has a significant impact on you.
- **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your rights.

Unless specified above, you may exercise by contacting us via mail, email, or phone at the respective locations listed in the “Contact Us” section below. When you submit a rights request, before honoring such a request, we may take additional steps as necessary and/or as required by applicable law to verify your identity.

You may authorize someone to act as your agent and submit a request on your behalf. You must supply your agent with written permission to act on your behalf, and your agent must provide proof of such authorization before we will act upon the request. If you are submitting a request to access or delete through an authorized agent, you must verify your identity directly with us, unless your authorized agent is acting pursuant to a power of attorney under applicable law.

5. Data Security

We take precautions to protect personal information under our control from misuse, loss, or alteration. Our security measures include physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal information. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website.

6. Retention

We will keep your personal information in your personnel file, if you have been hired, for a period as may be required by the laws and regulations of the relevant jurisdiction of your employment. In all other cases, we will retain your personal information for at least four (4) years from the date we make an employment decision regarding your job application, unless otherwise required or authorized by applicable law. Our service providers will retain your personal information solely in accordance with our instructions. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

7. Contact Us

If you have any questions or complaints about this Applicant Policy, or about our data privacy or security policies in general you may contact us by mail at: "K" Line America, Inc., Attention: Tina M. Williams, Vice President, Corporate Human Resources, Email address Tina.Williams@us.kline.com, Phone 804-762-6650.