

SPECTRUM GENERAL PRIVACY NOTICE

This **Notice** addresses how Spectrum Safety Solutions and its subsidiaries and affiliates (collectively, **Spectrum**) may collect and process personal information from you, as an individual, separate and apart from its *websites and mobile applications*, which may have their own privacy notices (please review the relevant site or mobile application for the applicable notice). Spectrum Job applicants, please see our [Job Applicant Privacy Notice](#). For individuals in the United States, Spectrum has a [HIPAA Privacy Notice](#). See Spectrum's [Cookies Policy](#) for information about cookies on our Websites and in our Apps.

Spectrum interacts with individuals in a variety of ways: as end users of our products, employees of our business customers and suppliers, and others in our communities. To enable these interactions, Spectrum may need to collect and process personal information. Spectrum has implemented technical, administrative, and physical measures to safeguard any personal information we may collect. As this Notice is intended to cover a variety of situations, some information in this Notice may not apply to you. For example, if you do not have a warranty with a Spectrum company, Spectrum would not be collecting warranty information from you. Also, Spectrum complies with applicable legal requirements and refrains from the collection or use of personal information in a location as prohibited by applicable law.

Please review this Notice periodically for changes, as we may update it from time to time without prior notice. The effective date of this Notice appears below.

What personal information might Spectrum collect?

Spectrum collects personal information subject to applicable legal requirements. Because this Notice covers a wide variety of situations, there may be data elements listed here that do not apply to your specific situation. Please contact Spectrum in the "How Can You Contact Spectrum" section below with any questions.

Type of personal information	Outsourced Labor	Personnel of suppliers, vendors, and business customers	Visitors of Spectrum systems and facilities	Persons authorized to use Spectrum systems	Consumers and end users of certain Spectrum products	Others*
Name, including given, family, middle, any suffix (such as Junior or Senior), and salutation (such as Mr. or Ms.)	X	X	X	X	X	X
Basic identification information, such as date of birth, gender, and/or relationship to insurance policy holder	X	X			X	X
Emergency contact information	X	X			X	
Work contact information, including telephone numbers, fax number, email address, pager number, mailing address, and work location	X	X	X	X	X	
Home address, personal email address and home telephone number, including personal mobile	X				X	X
Work experience, education and job history, skill categories including language skills, licenses, certifications, authorization to perform a certain job, or memberships to and participation in trade associations or professional organizations	X	X				
Information about an individual's job, including job title, department, job function, and cost center	X	X	X	X	X	
Information about an individual's employer, including company name(s), company location(s), company address(es), and country of incorporation	X	X	X	X		
Name of supervisor and/or assistant	X	X	X	X		
Training, development, and/or performance review information	X	X				

Spectrum computer, network, and communications information and logs covering the use of company phones, computers, electronic communications (such as email and electronic calendars), and other information and communication technology, including but not limited to username/login identification, passwords, answers to security questions, and other information required to access Spectrum applications, networks, systems, and services as well as information that you store, send, submit, or receive through Spectrum's networks and systems	X	X	X	X	X	X
Work assignments and work product that may include a connection to you, such as but not limited to documents and files with you identified as the author and tasks assigned to you	X					
Military service information as required by applicable requirements and law	X					
Environmental, health, and safety information	X	X	X	X	X	
Agreements, programs, and activities in which you participate	X	X		X	X	
Payment and invoice-related information, including government identification numbers and bank account information	X	X	X	X	X	
Language and communication preference(s)	X	X			X	
Information collected through a voluntary survey or promotion or through use of a product, such as a security system	X	X			X	
Record of any incident occurring on Spectrum premises or during work	X	X	X	X	X	
Travel and expense information related to work assignments, including visa information, expense details, and supporting bills	X					
Information that may be collected as part of an assignment, such as time and attendance data, badge information, photographs, audio, video, biometric information (e.g., fingerprint, iris scan, or voice recognition), or geolocation data used for a particular role or assignment, but such collection will be known, transparent, and consistent with applicable law	X				X	
Country of birth, citizenships held (past and present), and permanent residency status, as required by applicable law	X					
Required screenings, such as a medical examination, drug screening, and/or background check information as required by applicable law	X					
Information that may be required for international trade compliance regulations to permit your access to certain technologies or other information related to a particular assignment or visit as required by applicable law	X	X	X	X	X	
Government-issued identification numbers (in whole or in part), such as a tax identification number, Spectrum assigned identification number, social security/insurance number, government-issued driver's license number, visa, passport, or other document number	X	X	X	X	X	X
Qualifications to serve as a supplier, such as conflicts of interest information		X				
Visitor information, including time, date, and location of visits, information regarding a vehicle for parking purposes, and information necessary to maintain visitor logs and denied party screening	X	X	X	X	X	
Listing of nominal gifts that may have been provided or received		X				
Location information for certain sites that provide location-based services, such as maps, access to printers based on location, or availability of nearby conference rooms, but such collection will be known and transparent			X	X	X	
Warranty-related information, such as the product purchased, and information related to the servicing of a product					X	
Information provided to facilitate a service or request assistance, such as product use or problem information					X	
Information required to process a claim or provide requested benefits or services, which may include health information, government identification numbers, or other information					X	X
Any information that a person chooses to include in a document that is part of a legal proceeding involving Spectrum	X	X	X	X	X	X

* such as dependents and family members of Spectrum employees, emergency contacts, parties to insurance claims

Why does Spectrum use the personal information it collects?

Except where used in support of a contract with you or to fulfill a legal obligation, Spectrum will only use your personal information for legitimate business interests such as those described below.

Purpose	Outsourced Labor	Personnel of suppliers, vendors, and business	Visitors of Spectrum systems and facilities	Persons authorized to use Spectrum	Consumers and end users of certain	Others*
Conducting regular business operations, including designing and developing products, managing an Enterprise Resource Planning (ERP) system, sending invoices and collecting payment, providing payment, and providing goods and services to customers, which may include sharing limited personal information with customers or other business partners	X	X	X	X	X	
Providing requested products and services, which may include use of geolocation for certain applications in a known and transparent manner	X	X			X	
Conducting charity campaigns	X				X	
Staffing planning, including as that may impact budget and financial planning and reporting	X					
Responding to situations involving a risk of health or safety, including an emergency	X	X	X	X	X	X
Managing communications and notices	X	X	X	X	X	X
Planning and providing health and safety programs and services, including drug screening and health and safety programs	X					
Reporting and statistical analyses, including global enterprise headcount, demographics, and reporting required by applicable law	X				X	
Managing physical security, including access controls and security, facility access and safety, and disaster preparedness	X	X	X	X	X	
Managing, maintaining, and securing information technology (IT) systems, such as computer networks, email, internet access, Enterprise Resource Planning (ERP) systems, and workflows, including <ul style="list-style-type: none"> ○ Access controls and security for computer and other systems ○ Internet, intranet, email, social media, and other electronic system access ○ Virus, intrusion, and insider threat scanning and analysis ○ Creation and analysis of logs for security and helpdesk purposes ○ Providing helpdesk support and system maintenance activities ○ Backing up and recovering data and providing disaster recovery services 	X	X	X	X	X	X
Overseeing location tracking, duration, and other telematics of certain Spectrum assets and applications for management of services provided, security, safety, and efficiency	X	X	X	X		
Ensuring compliance with import, export, and other international trade controls, including managing registrations and authorizations, determining access to controlled technologies and/or commodities, and screening for sanctioned or restricted countries or parties	X	X	X	X	X	
Responding to questions or concerns submitted to the "Spectrum Ethics & Compliance" program	X	X	X	X	X	X
Performing audits and compliance reviews to ensure compliance with applicable policy, regulation, and law	X	X	X	X	X	

Conducting and managing internal and external investigations, including Legal, Global Ethics & Compliance, and International Trade Compliance reviews and any resulting disclosures to government agencies	X	X	X	X	X	X
Evaluating and reporting conflicts of interest	X	X	X	X	X	X
Addressing environmental, health, and safety issues, including injury and damage claims	X	X	X	X	X	X
Prosecuting and defending claims in litigation, arbitration, administrative, or regulatory proceedings, including but not limited to pre-dispute activity, evidence collection, discovery, litigation holds and e-discovery efforts	X	X	X	X	X	X
Responding to law enforcement and other government inquiries	X	X	X	X	X	X
Protecting intellectual property rights, including but not limited to patent filings	X	X				
Business planning, including planning for or executing mergers, acquisitions and divestitures	X	X	X	X	X	
Facilitating investor management activities	X					
Documenting participation in professional organizations and provision or receipt of business gifts and hospitality		X			X	
Administering of marketing, contract, joint ventures, and other business efforts, including without limitation invoice and payment processing, project management, and customer surveys and promotions	X	X	X	X	X	
Designing, selling, producing, and improving products		X			X	
Providing customer service and support		X			X	
Training and certification of customer, supplier, and vendor personnel		X	X	X	X	
Conducting supplier and vendor due diligence, including risk assessments		X	X	X		
Developing and managing budget and financial planning and reporting	X	X	X	X	X	
Providing benefits and services as requested by either an employee or by a beneficiary or dependent						X
Ensuring compliance with applicable laws, regulations, and Spectrum policies concerning business gifts and sponsored travel to third parties	X	X	X	X	X	
As required or expressly authorized by applicable law or regulation	X	X	X	X	X	X

With whom might Spectrum share the information it collects?

Spectrum will not sell or otherwise share your personal information outside the Spectrum group of companies, except to:

- service providers Spectrum has retained to perform services on our behalf. Spectrum will only share your personal information with service providers whom Spectrum has contractually restricted from using or disclosing your personal information except as necessary to perform services on our behalf or to comply with legal requirements; comply with legal obligations, including but not limited to in response to a legitimate legal request from law enforcement authorities or other government regulators;
- investigate suspected or actual illegal activity;
- prevent physical harm or financial loss; or
- support the sale or transfer of all or a portion of our business or assets, including through bankruptcy.

If you provide services to a Spectrum business and need to access a customer or end user's facility, Spectrum may need to provide your personal information to that customer or end user to facilitate your access to the site in compliance with security requirements.

Except where used in support of a contract with you or to fulfill a legal obligation, our use of your personal information will be only for legitimate business interests as set forth above.

Where does Spectrum store your personal information?

Because Spectrum is a global company with locations in many different countries, we may transfer your information from one legal entity to another or from one country to another to accomplish the purposes listed above. These countries include, at a minimum, the United States, the many of the member states of the European Union, Norway, the United Kingdom, Canada, and other countries, including some in Asia such as India. We will transfer your personal information consistent with applicable legal requirements and only to the extent necessary for the purposes set forth above.

Spectrum relies on available legal mechanisms to enable the legal transfer of personal information across borders. To the extent that Spectrum relies on the standard contractual clauses (also called the model clauses) or intercompany data processing and transfer agreements to authorize transfer, Spectrum will comply with those requirements, including where there may be a conflict between those requirements and this Notice.

How long does Spectrum retain Personal Information?

Spectrum retains personal information for the length of time required to fulfill the purpose for which it was originally collected and for any additional period as required by applicable law or regulation, court, administrative or arbitration proceedings, or audit requirements.

What choices do you have about how Spectrum uses your personal information?

Where possible, Spectrum will provide you with the opportunity to decide whether to provide your Personal Information. There may be circumstances in which you will not be provided with a choice, such as IT security practices like virus and malware scanning for individuals with access to Spectrum networks. Depending on the nature of the personal information and the reason that Spectrum may require it, Spectrum may be unable to fulfill your request without collecting and processing your personal information.

You will always have a choice about whether Spectrum uses your personal information for marketing purposes. If you have provided us with your personal information and would now like to request that it is no longer used for marketing purposes, please contact the businesses from which you are receiving the marketing communications. The communications themselves and the business website will provide you with the contact details.

What additional information should specific individuals know?

California residents have rights under the California Consumer Privacy Act (**CCPA**), effective January 1, 2020, including the right to:

- a. know what categories of your personal information we have collected and used, including how the personal information was collected;
- b. know what categories of personal information are being sold or disclosed and if sold or disclosed, the categories of third parties receiving it;
- c. access personal information collected about you; and
- d. request that your personal information be deleted.

Requests to exercise rights under the CCPA are subject to Spectrum's verification and certain restrictions under the CCPA. Spectrum will not discriminate against California residents for exercising any of their applicable CCPA rights.

While California residents have the right to opt-out of the sale of their personal information under the CCPA, Spectrum does not sell personal information to third parties. If our practices change, we will update this Privacy Notice and take any necessary action to comply with applicable law.

California residents who wish to exercise their CCPA rights can contact Spectrum at privacy@spectrum-safety.com, or using the [webform](#); please put "California Privacy Rights" in the subject of your request and describe the nature of your request. You may also call Spectrum regarding the CCPA at 1-800-XXX-XXXX.

As defined by California's "Shine the Light Law," California residents may annually request and obtain information that is shared with other businesses for their own direct marketing use within the prior calendar year. Spectrum does not share your personal information with other businesses for their own direct marketing use.

Users from the European Union, Norway, the United Kingdom and other countries with privacy laws: You have the right to lodge a complaint with your national or state data protection authority,

which may also be known as a supervisory authority. You also have the right to withdraw consent, to request access to and correction or erasure of your personal information, seek restrictions on or object to the processing of certain personal information, and seek data portability under certain circumstances. Please contact Spectrum with any request to access, correct, erase, object or seek restrictions or portability, using the contact methods below.

Users from the United States: Spectrum does not collect Social Security Numbers through www.Spectrum.com. Spectrum does, however, collect Social Security Numbers where required by law, such as tax and payroll purposes for its employees. When Spectrum collects and/or uses Social Security Numbers, Spectrum will take proper care by protecting confidentiality, limiting collection, ensuring access on a need-to-know basis, implementing appropriate technical safeguards and ensuring proper disposal.

How can you contact Spectrum?

If you wish to access, correct or update your personal information, or if you have questions about Spectrum's privacy practices in general or a complaint, please email privacy@spectrum-safety.com.

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