

JOB APPLICANT PRIVACY NOTICE

Spectrum Safety Solutions and its subsidiaries and affiliates (collectively, Spectrum) are responsible for the privacy of its online job application and recruiting systems and any information that an individual may provide in the course of pursuing employment opportunities with Spectrum. Spectrum has different systems for receiving and reviewing job applications in different countries. This Job Applicant Privacy Notice covers both the electronic systems that Spectrum has implemented for job applications and the processes that some locations may use that do not involve an online system. For both approaches, Spectrum has implemented technical, administrative, and physical measures to safeguard any personal information that we may collect.

Spectrum's online job application and recruiting systems, including the Careers website, are used for recruiting, to allow individuals to apply for employment with Spectrum, and to ensure that Spectrum complies with applicable legal and regulatory requirements in receiving employment applications. These systems are intended for visitors to review, and possibly apply for, Spectrum employment opportunities. Do not use Spectrum's online job application and recruiting systems for any other purpose.

With limited exceptions, Spectrum only accepts applications from individuals who are at least 18 years of age. If you are under the age of 18, do not provide Spectrum with your personal information for purposes of applying for a job unless you are directed otherwise.

This Notice may be modified from time to time by posting an update. We encourage you to review this Notice on a regular basis for any changes.

What personal information might Spectrum collect?

To review postings on Spectrum's job online application systems, communicate with Spectrum about job openings, and apply for a job with Spectrum, you will be asked to provide your personal information. With variation in certain countries, where some of these data elements may not be requested or may be requested once your employment is confirmed or starts, the personal information that you may be asked to provide includes:

Name

Contact information, including home address, home telephone, and email address

Date of Birth

Government identification document or number, including a drivers' license

Work history

Education

Resume or CV and/or a cover letter, including any information you provide in those documents

Citizenship and/or permanent legal residence

Eligibility to work, including documentation of immigration status

Interest in employment opportunities

Job specific questions that relate to the fitness of a candidate for a particular job

References (if you provide information regarding other individuals, you must obtain their consent before providing the data to Spectrum)

Information that we may be required by law to ask in certain countries, such as whether you have previously worked for a government agency, whether you are related to a government official,

Spectrum officer, or a member of the Spectrum Board of Directors, or whether you are subject to a restrictive covenant with a current or former employer

Information you provide to create security questions and answers used to validate your identity when you return to the website

Where you learned about the job opening

Any other information that you may choose to provide as part of your application

Information provided by third party sites, if you apply for a job opening through a third party site

In the United States and U.S. territories, Spectrum is required by law to invite individuals to self-identify their ethnicity, gender, veteran status, and disability information. That information is entirely voluntary and your decision to provide or withhold any of that information will not impact how we consider you for employment.

For certain jobs and in certain locations, you may be asked to have a medical examination, hearing or vision checks, drug testing, a background check, or a criminal history check. These will only be performed with your consent, but in certain circumstances, your offer of employment may be contingent on your successful completion of one or more of these checks. Spectrum does not perform criminal history checks where prohibited from doing so by law. Spectrum may confirm the information provided in your application, such as your references, driving license and record, education and job history, without seeking your additional consent.

If you access a Spectrum online job application system on a mobile device, the website will collect information necessary to communicate with your device and provide any customization that you may request. This information may include your device identification or number, your Spectrum, and your location.

In addition, Spectrum monitors user traffic patterns on its job application websites, including a user's domain name, browser type, date and time of access, and pages viewed. Our web servers collect the domain names but not the e-mail addresses of visitors. This information is collected in order to measure the number of visitors to our websites and to determine which areas of the website users find useful based upon the amount of traffic to particular areas. Spectrum uses this information to enhance users' experience and to better prepare content based on the user interests.

How might Spectrum use the personal information it collects?

Any personal information collected may be used to:

- allow you to apply for employment with Spectrum and evaluate your application, including without limitation arranging for and conducting phone screening, interviews, and other applicable assessments
- invite you to apply for and consider you for other opportunities that may be or become available
- contact you with regard to an application or other opportunity or communicate changes
- validate reference checks, conduct background checks as appropriate, and perform denied party screening
- facilitate your hiring and administer your employment, if you are hired
- comply with legal and regulatory requirements involving job applicants, which may include providing reports to government agencies
- provide you with opportunities to offer feedback on your experience, such as through a survey
- conduct analysis on applicant trends to understand and improve Spectrum's recruitment practices
- verify your identity to ensure security for one of the other purposes listed here
- ensure or enhance the security of Spectrum's electronic systems
- protect against fraud
- conduct internal investigations and comply with legal obligations

With whom does Spectrum share the personal information it collects?

Spectrum will not sell or otherwise share your personal information outside the Spectrum family 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 with whom Spectrum has contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements
- comply with legal obligations, including if we are required to do so by law, 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
- support the sale or transfer of all or a portion of our business or assets (including through bankruptcy)

Spectrum has service providers that assist with its online job application systems. These providers manage the websites, provide back-up storage, assist with job postings, enable video interviews, and facilitate recruitment of candidates. Spectrum may also use other service providers, but any service provider utilized will be for the purposes identified in this Notice and will provide services under a contract as mentioned 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 in order 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, 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 Binding Corporate Rules 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 your personal information?

For unsuccessful candidates, Spectrum will retain your application information for a maximum of three years from the date of last activity, except where law or regulation, court, administrative or arbitration proceeding, or an audit requirement requires otherwise. For successful candidates, Spectrum retains your information according to the Employee Privacy Notice.

If you would like to have your personal information updated, corrected or deleted, email recruiting@spectrum-safety.com. Unless applicable law or regulation, court, administrative or arbitration proceeding, or an audit requirement prevents deletion, Spectrum will delete your personal information within a reasonable period of time and keep only a log of your name, the date of your deletion request, the job(s) for which you applied, and the country from which you applied. Spectrum retains this information to demonstrate that it has complied with your request.

Beyond the retention periods and for applicants who have requested deletion, Spectrum may retain anonymous data for statistical purposes to understand and improve its recruitment practices.

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

You have the choice about whether or not to provide Spectrum with your personal information, but if you choose not to provide your information, Spectrum will be unable to consider you for a position. Spectrum asks only for information that it requires to evaluate you for a position to which you may apply, to authenticate you when you log into our online application systems, and as may be required by applicable law.

How does Spectrum use cookies or other tracking technologies?

Cookies are small text files sent to and stored on users' computers that allow websites to recognize repeat users, facilitate users' access to websites, and allow websites to compile aggregate data that will allow content improvements. Cookies do not damage users' computers or files. Web beacons are transparent graphic images, often just the size of a single pixel, that allow websites to track activity on the site.

Spectrum uses both cookies and web beacons on the Careers website and other Spectrum job posting sites to collect aggregate and anonymous usage data so that Spectrum can improve the functionality of the website. Spectrum may also use cookies to enhance your user experience. For example, the website may permit you to select a language and/or geographic location preference, which will be stored for future visits.

These job posting websites also use cookies from Spectrum's service providers. These cookies contain a session ID to manage your activity during a session. Our service providers also use cookies to determine whether you navigated to this website from an external one to track the effectiveness of external postings.

If you do not want cookies to be accessible by this or any other Spectrum website, you should adjust the settings on your browser program to deny or disable the use of cookies.

What should you understand about the third party links that may appear on this website?

In some instances, Spectrum may provide links to non-Spectrum controlled websites, which Spectrum will make reasonable efforts to identify as such. Spectrum does not control such third party websites, however, and cannot be responsible for the content or the privacy practices employed by other websites. Furthermore, this Notice does not govern information collected about you by third parties.

What additional information should specific users know?

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

- know what categories of your personal information we have collected and used, including how the personal information was collected;
- know what categories of personal information are being sold or disclosed and if sold or disclosed, the categories of third parties receiving it;
- access personal information collected about you; and
- 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](tel: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 and 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 correct or change your personal information?

To change your information on one of Spectrum's online job application systems, you can log into your profile and make any corrections or deletions required. If you have applied to a job by another means (such as email), contact your local recruiting contact. To report problems with the Careers website or to pose questions or concerns, email recruiting@spectrum-safety.com.

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.

If you have any comments or questions or if there are other things we can do to maximize the value of Spectrum's job posting websites or systems, please email recruiting@spectrum-safety.com.

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