



## Applicant Privacy Policy

Last Updated and Effective Date: June 2024

Thank you for your interest in joining our team. S&C Electric Company is committed to protecting the privacy and security of your personal information. This Applicant Privacy Policy (“**Privacy Policy**”) outlines how S&C Electric Company and its affiliates (“**S&C**” or “**we**” or “**us**”) collect, use, store, or otherwise process the personal information of our job applicants and/or candidates (collectively, “**you**”). This Privacy Policy applies only to our recruiting process. For more information about S&C’s privacy practices, please refer to S&C’s [Website Privacy Policy](#). We also describe in this Privacy Policy our handling of “sensitive” personal information, which is subject to additional protections under applicable data privacy laws. By uploading your resume to our recruiting platform, you consent to the collection, use, and processing of your personal information in accordance with this Privacy Policy.

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### **1. Collection of Personal Information**

We collect personal information that you provide during the application process. For the purposes of this Privacy Policy, “**Personal Information**” is any information about an identifiable individual collected in connection with the recruitment process. S&C may collect personal information directly from you, as a job applicant, or may receive personal information from third parties, for example, in connection with a background, employment, or reference check, subject to your consent where required by law.

Subject to applicable law, we may collect, store, and process the following categories of personal information from you through the application and recruitment process:

- Personal identifiers such as name, title, addresses, telephone numbers, personal email addresses, and date of birth;
- Work history, skills, certifications, and other relevant experience including information contained in a resume, CV, cover letter, or job application;
- Education information including educational background, degrees awarded, transcripts, and other information provided in support of the job application;
- Information collected during phone screenings and interviews;
- Details regarding the type of employment sought, desired salary, willingness to relocate, job preferences, and other information related to compensation and benefits;
- Details of how you hear about the position you are applying for;

- Any sensitive and/or demographic information processed during the application or recruitment process such as gender, military service, information about your citizenship and/or nationality, medical or health information and/or your racial or ethnic origin;
- Reference information and information received from background checks, where applicable, including information provided by third parties;
- Information related to previous applications to S&C or previous employment history with S&C;
- Your information from publicly available sources, including online, that we believe is relevant to your application or a potential future application (e.g., your LinkedIn profile, social media);
- Information related to any assessment you may take as part of the interview screening process; and/or
- Other information, including any other personal information you voluntarily choose to provide in connection with your job application, such as compensation history.

## **2. Use of Personal Information**

We only process your personal information where applicable law permits or requires it in connection with carrying out our application and recruitment process, conducting equal opportunity and diversity monitoring (where permitted or required by law), determining your eligibility and suitability for certain jobs, where the processing is necessary to comply with a legal obligation that applies to us, for our legitimate interests or the legitimate interests of third parties, or with your consent if applicable law requires consent.

We will only collect and use demographic information processed during the application for equal opportunity and diversity monitoring where permitted or required by law. Where required by law, we will obtain your consent prior to collecting and using such data.

## **3. Disclosure of Personal Information**

We will only disclose your personal information to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the recruitment process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks, data storage or hosting, coordinating health physicals, and IT services.

We may also disclose your personal information where permitted or required by applicable law, or for additional purposes with your consent where such consent is required by law. For example, we may share personal information with law enforcement where required, or with prospective business partners in the case of a prospective merger, acquisition, or similar business transaction involving our company or its assets.

## **4. Protection of Personal Information**

We will protect your personal information with safeguards commensurate with the sensitivity of the data. These include physical, organizational, and technical safeguards. Unfortunately, the transmission or storage of personal data via the internet or other electronic means is not completely secure. Although we will do our best to implement safeguards to protect your

personal data, we cannot guarantee the security of your data that is transmitted or stored via our website.

## 5. Retention of Personal Information

We retain your personal information for as long as necessary to fulfill the purposes we collected it for and for other legitimate business purposes, including meeting our legal, regulatory or other compliance obligations.

If you are not selected for a position, your personal information will be kept for a period of time after you apply to allow us to record the reason for our decision in relation to your application (including so that we can exercise, establish, or defend any legal claims). Where permissible, we may also retain your personal information for a reasonable period to consider you for other suitable openings within S&C in the future. If you would like to opt-out from S&C's policy of retaining your information for the purposes of considering you for other suitable openings, please email [compliance@sandc.com](mailto:compliance@sandc.com).

If you are offered and you accept a position at S&C, the personal information collected during the recruiting process will become part of your employment record and will be governed by the S&C Employee Privacy Policy, which will include more information on how S&C will process your data as an S&C employee.

## 6. Your California Rights

The California Privacy Rights Act or ("CPRA") (Cal. Civ. Code § 1798.100 *et seq.*) affords consumers residing in California certain rights with respect to their personal information. If you are a California resident, this section applies to you.

### A. Summary of Categories of Personal Information Collected and Disclosed

We provide in the chart below a summary of our prior 12-month personal information handling practices. You can learn more about the information we collect above in the [Collection of Personal Information](#), [Use of Personal Information](#), and [Disclosure of Personal Information](#) sections above.

Category of Personal Information We Collect	Sources	Business or commercial purpose of processing and disclosure and recipients of personal information
Identifiers, such as name, title, addresses, telephone numbers, personal email addresses, and date of birth	You	<p><b><u>Sold</u></b> We have not sold your identifiers to third parties.</p> <p><b><u>Shared for Cross-Context Behavioral Advertising</u></b> We have not shared your personal information with third parties for cross-context behavioral advertising.</p> <p><b><u>Service Providers</u></b> We may have disclosed your identifiers with our service providers who provide</p>

		<p>services to us in relation to our human resources and business operations and process personal information on our behalf (including service providers for background checks, health physicals, data storage, IT services, and other purposes).</p> <p><b><u>Purpose of Processing</u></b>  We may have used and disclosed your identifiers for other reasons, as described in greater detail in the <a href="#">Use of Personal Information</a>, and <a href="#">Disclosure of Personal Information</a> sections.</p>
Any personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)), such as name, address, and telephone number	You	<p><b><u>Sold</u></b>  We have not sold your personal information to third parties.</p> <p><b><u>Shared for Cross-Context Behavioral Advertising</u></b>  We have not shared your personal information with third parties for cross-context behavioral advertising.</p> <p><b><u>Service Providers</u></b>  We may have disclosed your personal information with our service providers who provide services to us in relation to our human resources and business operations and process personal information on our behalf (including service providers for data storage, IT services, and other purposes).</p> <p><b><u>Purpose of Processing</u></b>  We may have used and disclosed your personal information for other reasons, as described in greater detail in the <a href="#">Use of Personal Information</a> and <a href="#">Disclosure of Personal Information</a> sections.</p>
Characteristics of protected classifications under California or federal law, such as your gender, age and racial or ethnic origin	You	<p><b><u>Sold</u></b>  We have not sold your personal information to third parties.</p> <p><b><u>Shared for Cross-Context Behavioral Advertising</u></b></p>

		<p>We have not shared your personal information with third parties for cross-context behavioral advertising.</p> <p><b><u>Service Providers</u></b> We may have disclosed your personal information with our service providers who provide services to us in relation to our human resources and business operations and process personal information on our behalf (including service providers for data storage, IT services, and other purposes).</p> <p><b><u>Purpose of Processing</u></b> We may have used and disclosed your personal information for other reasons, as described in greater detail in the <a href="#">Use of Personal Information</a> and <a href="#">Disclosure of Personal Information</a> sections.</p>
Professional or employment-related information, such as work history, skills, certifications, and other relevant experience including information contained in a resume, CV, cover letter, or job application	You; References	<p><b><u>Sold</u></b> We have not sold your professional information to third parties.</p> <p><b><u>Shared for Cross-Context Behavioral Advertising</u></b> We have not shared your professional information with third parties for cross-context behavioral advertising.</p> <p><b><u>Service Providers</u></b> We may have disclosed your professional information with our service providers who provide services to us in relation to our human resources and business operations and process personal information on our behalf (including service providers for background checks, data storage, IT services, and other purposes).</p> <p><b><u>Purpose of Processing</u></b> We may have used and disclosed your professional information for other reasons, as described in greater detail in the <a href="#">Use of Personal Information</a> and <a href="#">Disclosure of Personal Information</a> sections.</p>

<p>Education information, such as educational background, degrees awarded, transcripts, and other information provided in support of the job application</p>	<p>You; References</p>	<p><b><u>Sold</u></b> We have not sold your educational information to third parties.</p> <p><b><u>Shared for Cross-Context Behavioral Advertising</u></b> We have not shared your educational information with third parties for cross-context behavioral advertising.</p> <p><b><u>Service Providers</u></b> We may have disclosed your educational information with our service providers who provide services to us in relation to our human resources and business operations and process personal information on our behalf (including service providers for background checks, data storage, IT services, and other purposes).</p> <p><b><u>Purpose of Processing</u></b> We may have used and disclosed your educational information for other reasons, as described in greater detail in the <a href="#">Use of Personal Information</a> and <a href="#">Disclosure of Personal Information</a> sections.</p>
<p>Sensitive personal information or data, such as those listed under <a href="#">Collection of Personal Information</a></p>	<p>You</p>	<p><b><u>Sold</u></b> We have not sold your sensitive personal information to third parties.</p> <p><b><u>Shared for Cross-Context Behavioral Advertising</u></b> We have not shared your sensitive personal information with third parties for cross-context behavioral advertising.</p> <p><b><u>Service Providers</u></b> We may have disclosed your sensitive personal information with our service providers who provide services to us in relation to our human resources and business operations and process personal information on our behalf (including service providers for data background checks, health physicals,</p>

		<p>storage, IT services, and other purposes).</p> <p><b><u>Purpose of Processing</u></b></p> <p>We may have used and disclosed your sensitive personal information for other reasons, as described in greater detail in the <a href="#">Use of Personal Information</a>, <a href="#">Disclosure of Personal Information</a>, and <a href="#">Collection of Personal Information</a> sections.</p>
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Our prior 12-month personal information handling practices are consistent with our current personal information handling practices described in [Collection of Personal Information](#) in Section 1.

#### **B. Selling or Sharing of Personal Information**

We do not sell your personal information or share your personal information for cross-context behavioral advertising and have not done so in the prior 12 months. We also do not knowingly sell or share the personal information of children under the age of 16 and have not done so in the prior 12 months.

#### **C. Sensitive Personal Information**

Under applicable privacy laws, certain types of personal information are considered “sensitive” and create a heightened risk of harm for personnel. We may collect the following types of sensitive personal information from you: medical or health information, and racial or ethnic origin. We only collect this sensitive personal information for certain permitted purposes, such as to process your job application or for conducting equal opportunity and diversity monitoring (where permitted or required by law). Because we use your sensitive personal information for these permitted purposes, there is no need for us to provide a Limit Use and Disclosure of Sensitive Personal Information right under California law.

#### **D. Your Privacy Rights**

The California Privacy Rights Act (“CPRA”) affords California personnel certain rights with respect to their personal information, subject to certain exceptions. Subject to certain limitations you have the following rights: you have the right to know and access, correct, delete, data portability, and opt-out of the sale or sharing of your personal information. You also have the right not to be discriminated against for exercising any of your privacy rights.

You may exercise your privacy rights by emailing us at [privacy@sandc.com](mailto:privacy@sandc.com), or by completing our web form [here](#). In some instances, we will need to verify your identity before honoring your privacy right request. We will verify your identity by asking you to provide personal information related to your job application. We will honor your privacy rights request within 45 calendar days of receipt, unless we request an extension, as permitted by data privacy laws. However, we will honor opt-out of sale and sharing requests within 15 business days.

You may exercise your privacy rights through an authorized agent. If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, please [Contact Us](#).

If you have any questions about your personal information, please [Contact Us](#).

## **7. Notices for Canadian Applicants**

If you are located in Canada, please be advised that your personal information may be transferred, stored and processed to our service providers located outside of Canada. Similarly, if you are located in Québec, your personal information may be communicated outside of Québec. Accordingly, your personal information may be accessible to foreign courts, law enforcement and national security entities in such countries.

You may have certain privacy rights, depending on the province in which you are located. These rights are subject to limitations under applicable privacy laws and include the following:

- **Access:** You can request access to your personal information.
- **Correction:** You can request correction of any inaccurate personal information.
- **Withdrawal of Consent:** Where consent has been relied upon as the basis to collect, use or disclose your personal information, you may withdraw your consent to the collection, use, and disclosure of your personal information.
- **Complaint:** You can challenge compliance or file a complaint if you believe we have not complied with applicable privacy laws.
- **Cross Border Processing Information:** if you are a resident of Alberta, you may (i) obtain written information about our policies and practices with respect to service providers outside Canada; or (ii) ask questions about the collection, use, disclosure or storage of personal data by service providers outside Canada for or on our behalf.

To exercise your privacy rights, please [Contact Us](#).

## **8. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in legal, regulatory, or operational requirements. If we make changes, we will notify you by revising the date at the top of this Privacy Policy. We may also provide you with an additional notice in connection with making material changes to this Privacy Policy. Any updates will be posted on our website.

## **9. Contact Us**

If you have any questions about our processing of your personal information or would like to make an access or other request, please email us at [privacy@sandc.com](mailto:privacy@sandc.com).

## **10. Québec Supplement**

**Protection of Personal Information.** Within S&C, your personal information may be accessible to personnel that have a need to access the information in order to perform their duties, including human resources personnel, managers, and other personnel involved in the hiring process for the specific position you have applied for.



## **Roles and Responsibilities within our Organization**

Our Associate General Counsel-Global Compliance, Labor and Employment has overall responsibility for our compliance with applicable privacy laws. The Associate General Counsel-Global Compliance, Labor and Employment also has responsibility for the day-to-day administration and implementation of our privacy program, such as developing and delivering privacy training to relevant personnel, establishing and publishing relevant policies and procedures, investigating and responding to complaints and potential violations of our privacy policies or relevant laws, responding to requests from individuals to exercise their rights under applicable privacy laws, and regularly reviewing and identifying opportunities to improve our privacy program.

Our Director – IT Risk Management has overall responsibility for preparing a written information security program, assisting with breach prevention, response and containment, and evaluating and implementing information security controls.

## **Notices for Applicants**

If you are located in Québec, your personal information may be communicated outside of Québec. Accordingly, your personal information may be accessible to foreign courts, law enforcement and national security entities in such countries.

Québecers may have certain privacy rights in addition to those listed in Section 7. Specifically, as of September 22, 2024, Québecers, can request a copy of their personal information in a structured, commonly used technological format.

## **Complaint Process**

Our process for dealing with complaints related to privacy and data protection matters generally includes:

- (1) Acknowledgement of receipt without undue delay;
- (2) Appropriate steps to confirm the identity of the complainant, and to obtain the details of the complaint as well as any relevant documentation;
- (3) Consideration of applicable laws;
- (4) An appropriate, fair and impartial investigation; and
- (5) Communicating the outcome of the investigation to the complainant, including any remediation measures we take (where justified).