

## Job Applicant Privacy Policy and Notice at Collection

This Job Applicant Privacy Policy (this “**Policy**”) describes how Worthington Armstrong Venture (“**WAVE**”, “**we**”, “**us**” and “**our**”) collects, uses, and discloses information about individuals who apply for open positions at WAVE (“**Job Applicants**”).

We may also provide you with additional privacy notices regarding our collection, use or disclosure of information. Please read this Policy and any other privacy notices carefully. Please note that this Policy does not form part of any employment contract or contract to provide services.

### 1. Types of Personal Information We Handle

We collect, store, and use various types of information that identifies, relates to, or could reasonably be linked to you (“**personal information**”) in connection with your application for employment with us. We collect such information either directly from you or (where applicable) from another person or entity, such as professional networking websites, job posting websites, employment agencies, recruitment companies, our parent companies and affiliates, or others who provide references. We may collect additional personal information throughout the course of your application process.

The information we collect from and about Job Applicants includes, where applicable:

- **Identifiers** such as first and last name; home and business addresses; telephone numbers; and email addresses; and, if provided an offer, identifiers related to your citizenship documents, such as driver’s license or passport number, state identification card number, or permanent resident card.
- **Professional or employment-related information**, including:
  - **Recruitment, employment, or engagement information** such as application forms and information included in a resume, cover letter, performance appraisal, portfolio, work sample, or otherwise provided through the application and recruitment process; career interests; citizenship and/or immigration status; our evaluations of your performance during the interview process; and if provided an offer, background screening and investigation results (including criminal history, drug testing information, motor vehicle records, and credit), citizenship documents, and references.
  - **Career information** such as prior employers, job titles, work history, salaries, work dates and work locations, and information about skills, qualifications, and experience.
  - **Expense information** such as expenses incurred during the interview process.
  - **Other information** that you may voluntarily choose to include on your resume or in connection with your application, a survey, or otherwise.
- **Education information** such as institutions attended, degrees, academic record, certifications, licenses, and professional memberships.

- **Audio or visual information** such as security camera footage, as well as other information relating to the security of our premises collected during in-person interviews or other parts of the recruitment process; and video or audio recordings of the interview process.
- **Internet and electronic network, and device activity and device information and related identifiers**, such as information about your use of our network while you are on WAVE premises, including IP address and device identifiers and attributes.
- **Other information that directly or indirectly identifies you**, such as race, ethnicity, veteran status, gender, disability, date and place of birth, citizenship, and permanent residence.

## 2. How We Use Personal Information

We may collect, use, disclose, and store personal information for our business purposes, which include, where applicable:

- **Engaging in the recruitment process**, including communicating with you, interviewing, and selecting and hiring new personnel.
- **HR management and administration**, including workforce planning, determining compensation, scheduling, IT and informational security purposes, and conducting internal analyses and audits.
- **Security management**, including detecting security incidents, debugging and repairing errors, and preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution; monitoring and controlling access to company premises and locations (including through use of security cameras); and safeguarding WAVE and its locations, services, and employees.
- **Legal compliance and assistance**, such as complying with applicable laws and regulatory obligations, and responding to and cooperating with legal or regulatory requests and investigations.
- **Exercising our legal rights**, including seeking legal advice from our external lawyers or in connection with litigation with a third party.

We may also use personal information for any other legally permitted purpose (subject to your consent, where legally required).

Some personal information we collect in the recruitment process, such as ethnicity and veteran status, is considered “sensitive” under applicable law. We use such information only for equal employment opportunity purposes and to comply with law. Some “sensitive” information may be required for certain job applications.

## 3. How We Disclose Personal Information

We may disclose certain personal information to the following types of entities or in the following circumstances (where applicable):

- **Internally:** to employees within WAVE, its parent companies and affiliates that participate in the recruitment process, such as HR managers and employee interviewers.
- **Vendors:** such as background check companies, drug testing companies, security providers, information technology providers, and employment businesses (e.g., recruiting contractors or agency workers) that provide us with services relevant to recruiting and hiring.
- **Recruiters:** to the extent you are working with a recruiter in connection with your application for employment and your recruiter is authorized by you to obtain feedback from us regarding your application and interview process.
- **Legal compliance and exercising legal rights:** when required to do so by law, regulation, or court order or in response to a request for assistance by the police or other law enforcement agency; and to seek legal advice from our external lawyers or in connection with litigation with a third party.
- **Business transaction purposes:** such as in connection with the sale, purchase, or merger of all or a portion of WAVE.
- **Consent:** with your consent and as permitted by law, we may disclose personal information to any other parties in any other circumstances.

#### 4. **Data Retention**

The personal information we collect from Job Applicants will be retained for as long as necessary to satisfy the purposes for which it was collected and our legal obligations. As described above, these purposes include our business operations and complying with reporting, legal and accounting obligations. In determining how long to retain information, we consider the amount, nature and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we process the personal information and whether we can achieve those purposes in other ways, the applicable legal requirements, and our legitimate interests.

#### 5. **Additional Privacy Information for California Residents**

California residents have certain rights regarding their personal information. Subject to certain exceptions, if you are a California resident, you may request:

- access to your personal information including the right to know the categories of personal information we have or will collect about you and the reason we will or have collected such information;
- correction of the personal information that we have or will hold about you that is inaccurate;
- deletion or removal of your personal information.

You also have the right not to be discriminated against (as provided for in California law) for exercising your rights.

**Exceptions to Your Rights:** There are certain exceptions to these above rights. For instance, we may retain your personal information if it is reasonably necessary for us or our service providers to provide a service that you have requested or to comply with law or to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for that activity.

**Exercising Your Rights:** To exercise one of the rights above, you may contact us as provided below.

We will take reasonable steps to verify your identity before responding to a request. In doing so, we will ask you for relevant verification information so that we can match at least two verification points with information we maintain in our files about you. If we are unable to verify you through this method, we will have the right, but not the obligation, to request additional information from you.

California law places certain obligations on businesses that “sell” personal information to third parties or “share” personal information with third parties for “cross-context behavioral advertising” as those terms are defined under the California Consumer Privacy Act (“CCPA”). We do not “sell” or “share” the personal information covered by this Policy and have not done so in the twelve months prior to the effective date of this Policy.

## **6. How to Contact Us About This Policy**

If you have questions about our collection, use, or disclosure of personal information, please contact us at [privacy@worthingtonarmstrongventure.com](mailto:privacy@worthingtonarmstrongventure.com).