

LANTECH
California Employee Privacy Notice

OVERVIEW

We recognize the importance of your privacy and maintaining the confidentiality of your personally identifiable information (“Personal Information”). This California Employee Privacy Notice (“Privacy Notice”) describes how Lantech.com, LLC (“we”, “us”, “our” or “Lantech”) may collect, use, disclose, protect and retain Personal Information that we collect about you in connection with your employment, including any post-employment activities, at Lantech. This Privacy Notice applies to employees that are residents of the State of California.

CATEGORIES OF PERSONAL INFORMATION WE COLLECT

In the past twelve months, and generally during the course of your professional relationship with us, we have collected the following types of professional and/or employment Personal Information about you to generally administer the employment relationship and run our business (as further described below):

- Identifiers and contact information, including name, personal contact information, emergency contact information, date of birth;
- Organizational data, including work contact details (e.g., address, email, phone number), position/title, job function, employee ID, work eligibility information;
- Contract and compensation data;
- Bonus and incentive information;
- Benefits information;
- Performance data;
- Professional background and education data;
- Compliance and disciplinary information; and
- Sensitive Personal Information (where permitted and in accordance with applicable law and in certain instances only where you voluntarily provide such information):
 - Social Security Number,
 - Driver’s license number,
 - Health and medical related data,
 - Race and ethnic origin,
 - Company username and password,
 - Contents of certain email or other communications made on company IT equipment,
 - Criminal history and drug and alcohol test results, and
 - Precise geolocation.

SOURCES OF COLLECTION

We collect Personal Information in the following ways, pursuant to applicable law:

- **Directly from you:** through your activities and interaction during the course of your employment.
- **Other sources:** from employment or recruitment agencies, background check providers, and your references.
- **Publicly available sources:** from public sources, when permitted by law.

If you provide to us any Personal Information relating to third parties, such as your reference(s), it is your responsibility to ensure that information you submit does not violate any third party’s rights and that you

have obtained approval from that individual to provide information to us. In addition, you agree to promptly inform the human resources department if any of your Personal Information is no longer accurate or up to date.

PURPOSES OF PROCESSING PERSONAL INFORMATION

We use your Personal Information for the following business purposes (“Processing Purposes”) associated with the administration of your employment with us and our general business operations:

- Administering the workforce;
- Administering and providing compensation;
- Administering and providing applicable benefits and other work related allowances;
- Recruiting and staffing activities;
- Complying with applicable laws and employment-related requirements (including certain diversity and inclusion reporting and making workplace accommodations);
- Complying with corporate financial responsibilities, including audit requirements (both internal and external), accounting, and cost/budgeting analysis and control;
- Conducting security and background screenings, to the extent permitted and in accordance with applicable law;
- Managing corporate information technology (e.g., computers, phones, company systems and applications) and information security, including the helpdesk, corporate directory, IT support, fraud prevention, and information security;
- Managing mergers and acquisitions, and other business reorganizations and job eliminations, business transfers, and potential divestments;
- Monitoring and ensuring compliance with applicable laws, regulatory requirements, and applicable Lantech procedures;
- Protecting the rights, safety, and property of Lantech, our employees, and/or others; and
- Responding to and complying with requests and legal demands from regulators or other authorities.

DISCLOSURES OF PERSONAL INFORMATION

Lantech may disclose all categories of Personal Information listed above to the following parties for the Processing Purposes identified above:

- **Within Lantech.** We may disclose information to other affiliates and subsidiaries (the “Lantech Group”) in the course of our normal business operations and as needed to address our global structure.
- **Customers and Third Party Business Partners.** As necessary in connection with business operations, limited other Personal Information may be disclosed to customers and other third parties.
- **Service Providers.** As part of normal business operations, Lantech may disclose Personal Information to third-party service providers, including in connection with human resources support, payroll-related tasks, information technology and security support, and other normal business operations support.
- **Government Entities or Regulators.** Lantech may also disclose Personal Information to governmental agencies and regulators (e.g., tax authorities, social security administration), benefits providers (e.g., health insurers), external advisors (e.g., lawyers, accountants, and auditors), courts and other tribunals, and government authorities, to the extent required or permitted by applicable law.

- **Other Disclosures with Your Consent.** We may ask if you would like us to disclose your Personal Information with other unaffiliated third parties who are not described elsewhere in this Privacy Notice, such as employee benefit partners and providers and occupational health providers.
- **Business Transactions.** In the event of mergers, reorganizations or similar corporate restructuring activities, we may disclose information with that company. In some instances, this may include your Personal Information.

RETENTION PERIOD

Lantech will retain your Personal Information, including Sensitive Personal Information, only for as long as it is necessary to fulfill the above-mentioned Processing Purposes, or as required to comply with applicable legal requirements. We consider the following criteria to determine the appropriate retention period for your Personal Information: the nature and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process the data, and applicable legal requirements. When we no longer need to use your Personal Information and/or we are no longer required by applicable law to retain Personal Information, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it. If Personal Information is needed for a legal claim, Lantech will retain this data for as long as the issue is active and up to the time when the statute of limitations has expired.

CONFIDENTIALITY AND SECURITY

Your Personal Information held by Lantech will be kept confidential in accordance with applicable Lantech policies and procedures. We have put in place reasonable technical and organizational security measures that are designed to protect your Personal Information from loss or unauthorized disclosure.

YOUR RIGHTS & CHOICES

You have certain rights regarding your Personal Information as detailed below:

- **Access and Portability:** You have the right to request access to Personal Information we hold about you. Specifically, you have the right to request access to information about the categories of Personal Information concerned and categories of recipients to whom the Personal Information has been or will be disclosed, and the sources from which we receive that Personal Information among other information. You generally have the right to receive this Personal Information, in a structured, commonly used, and machine-readable format so you can transmit this Personal Information to another entity.
- **Correction:** You have the right to request correction of inaccurate Personal Information we may have about you.
- **Deletion:** You have the right to request that we delete your Personal Information.
- **Opt out of the sale or sharing of Personal Information:** We do not currently, nor have we in the preceding 12 months, sold or shared (in this context, share means use of your Personal Information for cross-contextual behavioral advertising) your Personal Information. We do not knowingly sell or share the Personal Information of individuals under the age of 16.
- **Automated processing:** Under certain circumstances, you have the right to object to a significant decision based solely on automated processing (i.e., without human intervention) unless that decision is required or authorized by law. We do not make fully-automated decisions regarding our workforce.
- **Non-discrimination:** We do not discriminate against employees who exercise any of their rights described in this Privacy Notice, nor do we retaliate against employees who exercise these rights.

However, we may require the use of your Personal Information to administer your employment relationship with us. Therefore, in some instances, we may not be able to process your request.

- **Restriction of Processing of Sensitive Personal Information.** You have the right to request the restriction of processing of your sensitive personal information. At the current time, however, we do not use or disclose Sensitive Personal Information for purposes other than those expressed in this Notice or otherwise permitted by applicable law, and these uses cannot be limited under California law.

If you choose to assert any of these rights under applicable law, we will respond within the time period prescribed by such law. Please note that many of the above rights are subject to exceptions and limitations. Your rights and our responses will vary based on the circumstances of the request.

A person authorized to act on your behalf may make a verifiable request related to your Personal Information. If you designate an authorized person to submit requests to exercise certain privacy rights on your behalf, we will require verification that you provided the authorized agent permission to make a request on your behalf.

Your verifiable request must: (i) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Information or an authorized representative of that person; and (ii) describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

To exercise your rights, please contact us as stated in the "Contact Us" section of this Privacy Notice.

CONTACT US

Questions, comments, requests, or complaints regarding this Privacy Notice and/or our use of your Personal Information should be addressed to the contact information below.

Lantech.com LLC
Attn: Christina Jay
Email: hr@lantech.com

UPDATES

We may update this Privacy Notice to reflect changes in the way we process Personal Information. We will notify you about such changes in the way we use your Personal Information in compliance with applicable law.

Effective Date. 02/22/2024