

# AESC Privacy Policy for Job Applicants and Candidates

AESC and its affiliates are committed to protecting the privacy and security of personal information provided to us by job applicants. This policy outlines our practices regarding the collection, use, and processing of personal data across all countries during our application and recruitment process.

## This policy explains:

- What information we collect during our application and recruitment process and why we collect it;
- How we use that information; and
- How to access and update that information.

## Collection and Use of Personal Information

When you apply for a position with AESC, we collect and process personal information such as your:

- name and contact details,
- employment history, education background,
- resume or CV, cover letter, transcripts
- information from interviews and phone-screenings you may have, if any;
- Details of the type of employment you are or may be looking for, current and/or desired salary and other terms relating to compensation and benefits packages, willingness to relocate, or other job preferences;
- Details of how you heard about the position you are applying for;
- Any sensitive and/or demographic information processed during the application or recruitment process such as gender, information about your citizenship and/or nationality, medical or health information and/or your racial or ethnic origin;
- Reference information and/or information received from background checks (where applicable), including information provided by third parties;
- Information relating to any previous applications you may have made to an AESC entity and/or any previous employment history with an AESC entity;
- 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); and/or
- Information related to any assessment you may take as part of the interview screening process.

- other relevant data you provide to us in support of a job application or recruitment and necessary for the recruitment process.

This information may be collected directly from you or from third parties, with your permission, as part of background checks.

## How we use information

Your personal information will only be used for recruitment purposes, including assessing your qualifications, verifying your information, and communicating with you during the recruitment process including:

- Assessing your skills, qualifications and interests against our career opportunities;
- Verifying your information and carrying out reference checks and/or conducting background checks (where applicable) if you are offered a job;
- Communications with you about the recruitment process and/or your application(s), including, in appropriate cases, informing you of other potential career opportunities at AESC;
- Creating and/or submitting reports as required under any local laws and/or regulations, where applicable;
- Where requested by you, assisting you with obtaining an immigration visa or work permit where required;
- Making improvements to AESC's application and/or recruitment process including improving diversity in recruitment practices;
- Complying with applicable laws, regulations, legal processes or enforceable governmental requests; and/or
- Proactively conducting research about your educational and professional background and skills and contacting you if we think you would be suitable for a role with us.
- As part of our commitment to equal opportunity employment, we may process information regarding your membership in various organizations to support our diversity and inclusion efforts. This may include associating participant membership with sensitive and/or demographic information.

We will also use your information to protect the rights and property of AESC our users, applicants, candidates, employees or the public as required or permitted by law.

If you are offered and accept employment with AESC, the information collected during the application and recruitment process will become part of your employment record.

## Global Data Privacy Compliance

AESC adheres to global data privacy laws by location, including the European Union's General Data Protection Regulation (GDPR) and other applicable regulations. We process personal data based on your consent or as necessary for legitimate business purposes, such as recruitment. We ensure that your personal information is handled in compliance with data protection laws, and we maintain appropriate security measures to safeguard your data.

## International Data Transfers

AESC may transfer your personal data to our affiliates and service providers in countries outside your own, including to the United States, to facilitate the recruitment process. When we transfer personal data across borders, we ensure that appropriate safeguards are in place to protect your information.

## Disclosure of Personal Data

We will not share your personal data with third parties except as necessary to facilitate the recruitment process or as required by law. This may include sharing your information with background check providers, recruitment platforms, or government authorities. Any third parties receiving your data are contractually obligated to protect it in accordance with applicable data protection laws.

## Data Retention

Your personal information will be retained for as long as necessary to fulfill the purposes for which it was collected, or as required by law. If your application is unsuccessful, we may retain your information for a reasonable period to consider you for future opportunities, unless you request otherwise.

## Your Data Privacy Rights

Depending on your location, you may have certain rights regarding your personal information, including the right to access, correct, delete, or object to the processing of your data. To exercise your rights or inquire about our data practices, you can contact AESC's Human Resources or Data Privacy team. We will respond to any requests in accordance with applicable law, and so there may be circumstances where we are not able to comply with your request.

## Sensitive Personal Data

In some cases, AESC may process sensitive personal information such as social security numbers, identification documents, or financial details as part of the recruitment process. We apply heightened security measures to protect this sensitive information and limit access to only those individuals who require it to perform their roles.

## U.S. state law requirements

Some U.S. state privacy laws, such as the California Consumer Privacy Act (CCPA), require specific disclosures for state residents.

This policy is designed to help you understand how AESC handles your information. In the sections above, we explain: (1) the categories of information AESC collects and the sources of that information; (2) how AESC uses information; (3) when AESC may disclose information; and (4) how AESC retains

information. AESC does not sell your personal information. AESC also does not “share” your personal information as that term is defined in the CCPA.

State laws like the CCPA also provide the right to request information about how AESC collects, uses, and discloses your information. And they may give you the right to access and correct your information, and to request that AESC delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising these privacy rights.

If you have questions or concerns related to your rights under CCPA, or would like to exercise your rights, you (or your authorized agent) can contact AESC. We’ll validate your request by verifying your interactions with AESC, and may require that you provide us with additional information, such as any names, phone numbers or email addresses you have used when communicating with us.

The CCPA also requires a description of data practices using specific categories. The below sections serve to breakdown the categories of information collected, business purposes and parties with whom information is disclosed.

a. Categories of information we collect

Identifiers and similar information, such as your name, phone number, and address; username and password; and unique identifiers tied to the browser, application, or device you’re using.

Demographic information, such as your age, gender, and language(s) spoken. If you choose, you may also provide additional information, like your racial or ethnic origin, religious or philosophical beliefs, trade union membership, sexual orientation, or gender identity.

Financial information, such as your current and/or desired salary and other terms relating to compensation and benefits packages.

Internet, network, and other activity information in connection with your use of AESC accounts, systems, and services, such as your search terms; views and interactions with content; and information about the interaction of your apps, browsers, and devices with AESC services (like IP address, crash reports, and system activity).

Geolocation data, including as determined by IP address, depending in part on your device and account settings.

Audio, electronic, visual, and similar information, such as information transmitted in connection with interviews or phone-screenings you may have, if any.

Communications data, such as emails that you may send or receive in connection with the application or recruitment process.

Health information, if you choose to provide it, in connection with the application or recruitment process, such as data you may provide in connection with an accommodations request.

Professional, employment, and education information, such as information you provide in connection with the application and recruitment process, as well as information AESC may otherwise collect through reference checks, criminal and financial background checks (where applicable) and information from publicly available sources, including online, that may be relevant.

Other information you create or provide, such as the content you create, upload, or otherwise provide in connection with the application and recruitment process.

Inferences drawn from the information above.

b. Business purposes for which information may be used or disclosed

Administrative purposes: AESC uses and may disclose information for purposes related to carrying out its application and recruitment process, including for assessing candidates; verifying information and conducting reference checks and criminal and financial background checks (where applicable); communicating with you; responding to requests for assistance with obtaining an immigration visa or work permit (where required); diversity, equity, inclusion and belonging; and other related activities.

Protecting against security threats, abuse, illegal activity, and violations : AESC uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, AESC may receive or disclose information about IP addresses that malicious actors have compromised.

Auditing and measurement: AESC uses information for analytics and measurement to understand use of AESC accounts, systems, and services.

Maintaining our services: AESC uses information to ensure our equipment, accounts systems, and services are working as intended, such as tracking outages or troubleshooting bugs and other issues.

Research and development: AESC uses information to improve our application and recruitment process, including improving diversity in recruitment practices.

Use of service providers: AESC shares information with service providers to perform services on our behalf, in compliance with this privacy policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help perform criminal and financial background checks (where applicable).

Legal reasons: AESC also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement.

c. Parties with whom information may be disclosed

Other people with whom you choose to share your information, such as the content you create, upload, or otherwise provide in connection with the application and recruitment process.

Third parties with your consent, for example if you have given us permission to contact your references.

Service providers, trusted businesses or persons that process information on AESC's behalf, based on our instructions and in compliance with this privacy policy and any other appropriate confidentiality and security measures.

Law enforcement or other third parties, in response to legal process or enforceable government requests, and as necessary to identify, report on and investigate violations of applicable laws and regulations.

## Changes to this Privacy Policy

AESC may update this privacy policy from time to time to reflect changes in our data practices or applicable laws. We encourage you to review this policy periodically.