

# JOB APPLICANT PRIVACY POLICY

## BACKGROUND & PURPOSE

The Cabinetworks Group recognizes the importance of protecting the privacy of all information provided by our recruits, applicants, or other candidates who apply to work for the Company ("Applicants" or "you"). This policy applies to Cabinetworks Group and all of its affiliates (collectively, "CWG" or the "Company"). You can find our family of brands <u>here</u>.

We created the following Job Applicant Privacy Policy ("Policy") guided by a fundamental respect for our Applicants' right to privacy. This Policy is intended to provide you with information about how the Company collects, uses, and secures your Personal Information. "Personal Information" is any information that identifies, relates to, describes, or is reasonably capable of being associated with you. Personal Information <u>does not</u> include information made publicly available in government records, deidentified information, or aggregated information.

This Policy describes our practices in connection with all the information we collect through: (1) the Careers section of the websites for the CWG family of brands (collectively, the "Careers Site"); (2) LinkedIn or other professional social media platforms; and (3) offline in connection with your application for a job or internship with the Company. Personal Information submitted elsewhere on our websites will be used in accordance with our general online <u>Privacy Policy</u> located at <u>https://cabinetworksgroup.com/privacy-policy/</u>.

#### YOUR CONSENT

In order to create an Account on the Careers Site for the purpose of applying online for a position with the Company, you must first acknowledge that you consent to your information being processed by the Company in compliance with this Policy. If you do not provide such consent, you will not be able to create an account for the purpose of applying online for a position.

## WHAT THE COMPANY COLLECTS AND WHY

The chart below details the categories of Personal Information the Company collects and the purposes for doing so. We will not use your Personal Information for other purposes without first notifying you.

#### **Recruiting and Hiring**

We collect the following categories of information from your application and through the interview process when you apply to work at the Company.

- Personal identifiers, such as your name or government ID number
- Account information, such as your username and password
- Professional or employment-related information, such as your work authorization status, records of previous interview with the Company, or whether you have relatives working at the Company
- Education information
- Characteristics of protected classifications under state or federal law, such as your gender, ethnicity, veteran status, disability status, age, or marital status
- Emergency contacts

#### **Mandatory Reporting**

We are obligated by law to provide the following categories of information to state and federal authorities.

• Characteristics of protected classifications under state or federal law, such as your gender, ethnicity, veteran status, disability status, age, or marital status

## **Background Check and Pre-Employment Screening**

Some applicants who are conditionally offered employment may be required to complete a background check or pre-employment physical, which include collection of the following categories of information.

- Personal identifiers, such as your name or government ID number
- Your references' personal identifiers
- Characteristics of protected classifications under state or federal law, such as your gender, ethnicity, veteran status, disability status, age, or marital status
- Professional or employment-related information
- Health insurance information
- Medical information
- Accident information and traffic convictions or forfeitures of driver's license for the last three years

Any information you submit through the Careers Site must be true, complete, and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action during employment, including immediate termination of employment. If you provide us with Personal Information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual before providing the information to us.

# WHO MAY HAVE ACCESS TO YOUR PERSONAL INFORMATION

The Company may share Personal Information with affiliates that are involved in evaluating candidates for a given position. The Company will remain responsible for Personal Information that is jointly used with affiliates. We will make the information available to personnel who have a need to know the information, including personnel in recruiting, human resources, information technology, and the department responsible for the position for which you are applying.

The Company may share Personal Information with our third-party vendors who provide services, such as hosting and operating the Careers Site, recruiting assistance, video interviews, personality and aptitude assessments, background check and/or pre-employment screening, and similar services.

The Company may also share Personal Information as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

The Company may transfer Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

## HOW WE SECURE YOUR PERSONAL INFORMATION

The Company is committed to ensuring your Personal Information is protected with reasonable security measures. The Company has put physical, technical, and administrative safeguards in place to help protect your Personal Information from unauthorized or inappropriate access.

At times, the Company may rely on vendors to help recruit candidates or collect and process applications. While we do our best to ensure these vendors will treat your Personal Information appropriately, we are not responsible for any of these vendors' failures to adequately protect Personal Information.

# DATA RETENTION

We will retain Personal Information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law. We may also retain your information for the purpose of considering whether your skills are suitable for other opportunities.

We may remove Personal Information for inactive accounts from our database, subject to any legal or regulatory obligations. Furthermore, the Company may delete Personal Information about you (including your CV and/or resume) from our database at any time and without providing a reason. Therefore, please retain your own copy of the Personal Information provided to us.

# PASSIVE INFORMATION COLLECTION; COOKIES AND SIMILAR TECHNOLOGY

We and our service providers may use "cookies" and similar technologies on the Careers Site. Please see the Workday cookie policy at <u>https://www.workday.com/en-us/privacy.html#cookies</u> for more information.

# CONTROLLING YOUR PERSONAL INFORMATION

You may login to your account on the Careers Site at any time and access, review, update, and delete your Personal Information through your "Account Settings."

# LINKS TO THIRD PARTY WEBSITES

The Careers Site may contain links to other websites. With respect to third-party websites linked to a CWG website, including social media platforms, once a user clicks on such third-party website, he or she will automatically be connected to that website. We do not control or manage these websites or their collection, processing or use of our users' Personal Information. As such, we recommend reviewing the privacy policy and terms of use of those third-party websites before users submit their Personal Information on non-CWG websites.

# EQUAL EMPLOYMENT OPPORTUNITY

The Company is proud to be an Equal Employment Opportunity and affirmative action employer. We celebrate diversity in race, color, creed, sexual orientation, gender identity or expression, age, religion, national origin, citizenship status, disability, ancestry, marital status, veteran status, medical condition, or any other protected category prohibited by local, state or federal laws. The Company does not tolerate discrimination or harassment based on any of these characteristics and encourages all qualified applicants to apply.

Primarily for monitoring and/or reporting purposes, we ask for the ethnic origin, gender, disability, or veteran status of applicants. If you have a disability and require an accommodation

to perform the essential functions of the position for which you are applying, you may so indicate on the application.

# ABOUT CHILDREN

The Careers Site is not intended for minors under the age of 16. If we identify any Personal Information in our systems related to minors under 16 we will permanently delete it.

# **CURRENT EMPLOYEES**

If you currently work for the Company or one of its affiliates, you must be eligible to apply for a different position with the Company to use the career site. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with your Human Resources representative for the new position concerning application eligibility, benefit programs, and Human Resources policies applicable to that position and location.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction where such distribution or use would be contrary to local law or regulation.

## YOUR CALIFORNIA RIGHTS

California residents may have additional rights over their Personal Information.

**The Right to Request More Information.** You may have the right to request more information about how we treated your Personal Information in the past 12 months, including:

- The categories of Personal Information we collected about you;
- The categories of sources from which we collected that information;
- Our business or commercial purpose for collecting that information;
- The categories of third parties with whom we shared that information; and
- The specific pieces of Personal Information we collected about you.

The Right to Request Access. You also may have the right to request access to your Personal Information.

**The Right to Request Deletion.** Under certain conditions, you may have the right to request that we delete your Personal Information. Please note that simply logging out or uninstalling an app does not delete your account or the Personal Information we may have collected.

How to Exercise these Rights. To submit a request to exercise these rights you may contact us at:

- 1-888-259-9761
- privacypolicy@Cabinetworksgroup.com

For all requests, please clearly state that the request is related to "Your California Privacy Rights" and provide your name, which brand or business unit you work(ed) with, state, zip code and an e-mail address or phone number where we can contact you.

If you make a request, we will acknowledge we have received it within ten days and we have forty-five days to respond to you, which may be extended if it is reasonably necessary.

**Verification.** Before we can respond to your request, we must verify your identity using Personal Information. If we are not able to verify your request, we will contact you for more information. If we are unable to verify your identify after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

**Designating an Authorized Agent.** You may designate someone to submit requests and act on your behalf (an "Authorized Agent"). To do so, you must provide us with written permission to allow your Authorized Agent to act on your behalf.

**Third-Party Marketing and Selling.** We do not provide your information to third parties for their direct marketing purposes. Neither do we intend to sell your Personal Information to third parties without providing you notice and an opportunity to opt out.

**No Discrimination.** We will not unlawfully discriminate against you for exercising any of these rights.

## QUESTIONS

If you have questions or concerns regarding this Policy or the handling of your Personal Information, please contact us either by email at <u>talent@cabinetworksgroup.com</u> or by mail at Cabinetworks Group Talent Acquisition, 4600 Arrowhead Dr., Ann Arbor, MI 48105.

## **CHANGES TO THIS POLICY**

This Policy is reviewed annually and updated as needed to ensure it accurately captures our practices and procedures. The effective date of each version of this Policy is identified below.

Effective: January 1, 2021