

Candidate Privacy Notice

(Applies to California Residents Only)

Last Updated: 8.1.23

Our Commitment to Privacy

PRIME ELECTRIC (“Company,” “we,” “us,” or “our”) has developed and implemented this workforce candidate privacy notice (“Candidate Privacy Notice”) to demonstrate its commitment to privacy for individuals seeking to become a member of our workforce. This Candidate Privacy Notice is designed to assist workforce candidates in understanding how we collect, use, share, and safeguard personal information as part of the candidacy process.

To Whom This Candidate Privacy Notice Applies

This Candidate Privacy Notice applies to candidates to become workforce members of PRIME ELECTRIC. Our privacy practices with respect to personal information collected in other contexts, including visiting our Website, can be found in our General Privacy Policy and our Workforce Member Privacy Policy.

How We Define Personal Information

Personal information (sometimes called “personal data”) is a broadly defined term whose legal definition varies across jurisdictions. When used in this Candidate Privacy Notice, personal information includes information that is reasonably capable of identifying a particular individual in connection with their application and consideration for employment. Personal information does not include information that cannot reasonably be used to infer information about or otherwise be linked to a particular individual or household. We may use personal information to create deidentified or aggregated consumer information that we may use without restriction in accordance with applicable law.

How to Read and Understand this Policy

To make this policy clear and easy to understand, we have broken it up into specific sections. The first section, the “**Notice at Collection**” provides notice about the categories of personal information we collect about you, the purposes for which we use the personal information (including if we sell or share your personal information, and how long we retain the information. The next section, “**Your Privacy Rights**” describes your legal rights pursuant to the California Consumer Privacy Act and how you may exercise those rights.

Notice at Collection

This Notice at Collection is incorporated into our Candidate Privacy Policy and provides notice of our personal information collection and use practices with respect to California residents who are or are seeking to become Company workforce members. For ease of reference, we have presented the relevant

information in a chart explaining our collection, use, and disclosure practices related to workforce members. You can learn more about our specific practices by reading our more detailed disclosures below the chart.

Categories of Personal Information	Examples	Collected From	Types of Service Providers/Contractors to Whom this Category is Disclosed
Unique Identifiers	Name, address, telephone number, email.	Candidates Employment Services Providers Staffing/Recruiting Agencies	Human Resources Services Providers Employee Screening Providers Staffing/Recruiting Agencies Employees' References Business Operations Services Providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Candidates Employment Services Providers Staffing/Recruiting Agencies	Human Resources Services Providers Employee Screening Providers Staffing/Recruiting Agencies Employees' References Business Operations Services Providers
Protected Classifications	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Candidates Employment Services Providers Staffing/Recruiting Agencies	Human Resources Services Providers Employee Screening Providers Staffing/Recruiting Agencies Business Operations Services Providers
Sensory Data	Audio/Visual Surveillance Video	Candidates	Business Operations Services Providers
Professional or employment-	Current or past job history or performance evaluations.	Candidates Employment Services Providers	Human Resources Services Providers Employee Screening Providers Staffing/Recruiting Agencies

related information.		Staffing/Recruiting Agencies	Business Operations Services Providers
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Candidates Employment Services Providers Staffing/Recruiting Agencies	Human Resources Services Providers Business Operations Services Providers

What Personal Information We Collect

The Personal Information that we collect and use about you may include:

- **Application information** as part of your candidacy to become a workforce member (e.g., resume, C.V., application form information; transcripts, recommendations letters, interview recordings and transcripts, and other application materials).
- **Contact information**, e.g., name, email address, telephone number, postal address.
- **Personal details**, e.g., title, name preferences, and date of birth.
- **Right to Work information**, e.g., work permit/visa application information.
- **Security information**, e.g., CCTV recordings, premises access logs, and video surveillance footage.
- **Other information.** Any other information that you provide directly to us or that we receive in connection with your application with the Company.

How We Collect and Disclose Candidate Personal Information

The personal information we collect depends on the nature and context of your interaction with our Company. For example, our collection practices will vary depend on whether you have submitted a resume or submitted your application through a staffing or recruiting agency. It may also depend on the nature of the position for which you are seeking employment, the physical location of work, and other factors.

Collecting Personal Information

We collect personal information about you from a variety of sources, but primarily from the members themselves. In addition, we gather personal information through your interaction with the Company's systems and personnel, and we receive personal information from third parties who provide it to us. The following is a list of the sources from which we may collect personal information:

- **Human Resources Service Providers:** When we refer to Human Resources Service Providers, we mean those persons or entities who assist in providing human resources and workforce management services, including background check providers, human resources software services providers, insurance providers, employee payment and benefits providers, governmental entities, and similar entities.

- **Business Operations Services Providers:** When we refer to Business Operations Services Providers, we mean those persons or entities with whom we have a relationship to provide business operations services and support to Prime Electric. These providers may include:
 - **IT Operations Providers:** Cloud computing service providers, internet service providers, data backup and security providers, functionality and infrastructure providers, and similar service providers.
 - **Professional Service Providers.** Including lawyers, accountants, consultants, security professionals, and other similar parties when disclosure is reasonably necessary to comply with our legal and contractual obligations, prevent or respond to fraud or abuse, defend ourselves against attacks, or protect the rights, property, and safety of us, our customers, and the public.

Disclosing Personal Information

We may disclose personal information to any of the entities identified as sources of personal information. We may also disclose any personal information to the following:

- **Affiliates.** With our affiliates, including our parent company, subsidiaries, joint venturers, or other companies that we control or that are under common control with us, including our parent company, Prime Group, Inc.
- **Legally Required Parties.** Persons to whom we are required by law to provide information, such as pursuant to a subpoena or a court order.
- **Reorganization.** Persons involved in the consideration, negotiation, completion of a business transaction, including the sale, merger, consolidation, acquisition, change in control, transfer of substantial assets, bankruptcy, or reorganization, and any subsequent integration.
- **Authorized Disclosures:** To any party when authorized by the individual to whom it pertains to share it.

In addition, we may collect personal information from any other person or entity with whom you provide a reference, including past employers, personal references, former colleagues, and others.

How We Use Candidate Personal Information

We use the personal information we collect as part of the candidate process:

- **To Process Employment Applications and Onboard New Hires:** We collect most personal information to evaluate your candidacy, including to open and maintain candidate records, communicate with you, conduct employment related background screening and checks, and evaluate your application.
- **For Diversity and Equal Opportunity Monitoring:** Where permitted by law, you have the option to provide certain sensitive personal information, such as race or ethnic origin, for the purposes of equal opportunities monitoring. If you decide not to provide this information, your application will not be prejudiced. You may also tell us if you have a disability, so that we can make appropriate arrangements for you to attend our offices and/or participate in an interview.

- **To Maintain Security at Our Premises:** If you attend in-person interviews at our offices or facilities, we may collect information related to your access to our building. This may include data related to your use of security control systems, audio and video captured on security cameras, and visitor logging information.
- **To Conduct Candidate Evaluations:** We collect and review your personal information from multiple sources to assess your suitability for employment or work with the Company. This may include obtaining pre-employment background checks.
- **For Onboarding:** We may collect personal information necessary for employee onboarding purposes. We will provide you with additional privacy notices at that time.
- **Required Disclosures:** To comply with applicable legal and regulatory requests and obligations (including investigations).
- **Legal Defense:** To establish or defend legal claims and allegations.
- **Other Security and Investigatory Purposes:** For security or the prevention, detection, or investigation of fraud, suspected or actual illegal activity, or other misconduct.
- **Professional Advice:** To seek advice from lawyers, auditors and other professional advisers.
- **For Similar Purposes:** When necessary or advisable we may process your personal information for purposes similar to those mentioned above, and consistent with the purpose for which you provided your personal information.

Retention of Personal Information

We will retain personal information only for so long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider: (i) the amount, nature, and sensitivity of the personal information; (ii) the potential risk of harm from unauthorized use or disclosure of your personal information; (iii) the purposes for which we process your personal information and whether we can achieve those purposes through other means; and (iv) the applicable legal requirements. In some circumstances, you may ask us to delete your personal information. Additionally, we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

How We Protect Personal Information

We have implemented and maintain reasonable security procedures and practices, appropriate to the nature of the information, to protect your personal information from unauthorized access, destruction, use, modification, or disclosure. However, no security measure is perfect, so we cannot guarantee the security of your personal information. Periodically, our operations and business practices are reviewed for compliance with policies and procedures governing the security, confidentiality, and quality of our information. Our corporate values, ethical standards, policies, and practices are committed to the protection of customer information. In general, our business practices limit employee access to confidential information and limit the use and disclosure of such information to authorized persons, processes, and transactions.

Children’s Personal Information

We do not consider candidates for employment under the legal working age for the jurisdiction in which employment is to be offered. We do not knowingly collect or process the personal information of individuals under the age of 18. If you believe that a child under 18 may have provided us their personal information, please contact us at PGI-HumanResources@primee.com.

Your Privacy Rights

California provides specific privacy rights under the California Consumer Privacy Act (CCPA) which may be exercised by California residents. These rights include:

- **Access.** The right to know (or confirm) what personal information a business has collected about you.
- **Deletion.** The right to request that a business delete personal information it has collected from you, subject to certain exception.
- **Correction.** The right to request correction of inaccurate personal information maintained by the business.
- **Opt-Out of the Sale/Sharing of Your Personal Information.** The right to opt-out of the sale of your personal information to third parties. The term “sale” varies by jurisdiction, but sometimes includes the right to opt-out of the use of personal information for targeted advertising purposes.
- **Limitation.** The right to limit a business’s use or disclosure of certain information, typically sensitive personal information. However, we do not use or disclose sensitive personal information for any purpose other than for permissible purposes under California law.
- **Opt-out of Profiling:** The right to opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **Non-Discrimination.** The right not to be discriminated against for exercising any of the rights conferred at law.

Exercising Your CCPA Rights

Submitting Access, Deletion, and Correction Requests

To make an access, deletion, correction, or limitation request, please email us at PGI-HumanResources@primee.com.

After we receive your request, to ensure the security of the information we store and consumers’ privacy, we will verify that you are appropriately affiliated with the subject of the request, either as the consumer

or as an authorized agent or guardian of the consumer. We may ask you to provide a few pieces of information to confirm your identity in our records.

You may designate an authorized agent to exercise your rights under the CCPA on your behalf. You must provide the authorized agent written permission to exercise your rights under the CCPA on your behalf and we may deny a request from an agent on your behalf if we cannot verify that they have been authorized by you to act on your behalf. Even if you use an authorized agent to exercise your rights under the CCPA on your behalf, pursuant to the CCPA we may still require that you verify your own identity directly to us. This provision does not apply if you have provided a power of attorney under the California Probate Code.

Limiting the Use of Your Sensitive Personal Information

Californians have the right to limit a business's use or disclosure of sensitive personal information. However, our Company does not use or disclose sensitive personal information for any purpose other than for permissible purposes under the CCPA.

Opting Out of the Sale/Share of Your Personal Information

We do not sell or share personal information related to the workforce member candidacy process. Please review the General Privacy Policy for more information about opt-out rights for website visitors.

International Data Transfers

Prime Electric is based in the United States, and we operate our website and portals from there. The laws that apply to the use and protection of personal information in the United States, or other countries or jurisdictions in which we transfer or process personal information, may be different from the laws and protections in your country. By submitting personal information to us, including by accessing our website and portals, you understand that we may process, store, and transfer your personal information in and to jurisdictions foreign to you, including the United States. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable privacy laws.

Updates to Our Candidate Privacy Notice

We may update this Candidate Privacy Notice from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, we may provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

Contacting Us

To ask questions or comment about this Candidate Privacy Notice and our privacy practices, contact us at PGI-HumanResources@primee.com .