

**Privacy Notice to California Job Applicants, Employees, and Independent Contractors**

**Effective Date:** January 1, 2023

This Privacy Notice for Job Applicants, Employees, and Independent Contractors (“**Notice**”) supplements the information contained in Quanex Building Products Corporation’s (“**Quanex**”, “**we**”, “**our**”, or “**us**”) general Privacy Policy (available at [www.quanex.com/privacy](http://www.quanex.com/privacy), as updated from time to time, and which is incorporated herein by reference). This Notice applies only to employees, independent contractors, and applicants for those roles who reside in California (collectively, “**you**” or “**your**”). For all other California residents, the California privacy notice section of our Privacy Policy applies. Any terms used in this Notice (whether or not capitalized) which are defined in the California Consumer Privacy Act of 2018 or its successor, the California Privacy Rights Act of 2020 (“**CCPA/CPRA**”) have the same meaning as in such definitions.

We want you to understand our collection, use, disclosure, and retention of your “Personal Information,” which means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. You should also review all other agreements or terms that may apply to your relationship with us.

We are committed to protecting your privacy, and we use administrative, technical, and physical safeguards designed to protect your Personal Information from unauthorized access, disclosure, alteration, or loss.

**Personal Information We Collect**

In the previous 12 months, we have collected the categories of Personal Information identified in Table 1 below to administer your and our relationship, comply with legal obligations, facilitate communications and efficiency, provide benefits, to ensure the safety of employees, independent contractors, facilities, and property, or for other purposes.

**CCPA/CPRA Categories of Personal Information We Collect and Use**

**TABLE 1**

Categories of Personal Information	Examples of Data within Category	Purpose for Collection and Use
A. Identifiers	Real name, postal address, internet protocol address, email address	<ul style="list-style-type: none"> <li>• Administer the employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Facilitate communications and efficiency</li> <li>• Provide benefits</li> <li>• Ensure the safety of employees, contractors, facilities, and property</li> </ul>
B. Personal information categories listed in the California Customer Records statute	Name, address, telephone number	<ul style="list-style-type: none"> <li>• Administer the employee/contractor relationship</li> <li>• Comply with legal obligations</li> </ul>

		<ul style="list-style-type: none"> <li>• Facilitate communications and efficiency</li> <li>• Provide benefits</li> <li>• Ensure the safety of employees, contractors, facilities, and property</li> </ul>
C. Protected classification characteristics under California or federal law	Age, gender, ethnicity	<ul style="list-style-type: none"> <li>• Administer the employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Provide benefits</li> </ul>
F. Internet or other similar network activity	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement	<ul style="list-style-type: none"> <li>• Administer the employee/contractor relationship</li> <li>• Facilitate communications and efficiency</li> <li>• Provide benefits</li> <li>• Ensure the safety of employees, contractors, facilities, and property</li> </ul>
G. Geolocation data	Geographic location	<ul style="list-style-type: none"> <li>• Facilitate communications and efficiency</li> <li>• Ensure the safety of employees, contractors, facilities, and property</li> </ul>
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> <li>• Facilitate communications and efficiency</li> <li>• Ensure the safety of employees, contractors, facilities, and property</li> </ul>
I. Professional or employment-related information	information about previous employment	<ul style="list-style-type: none"> <li>• Administer the employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Ensure the safety of employees, contractors, facilities, and property</li> </ul>
J. Non-public education information	school records or transcripts	<ul style="list-style-type: none"> <li>• Administer the employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Provide benefits</li> <li>• Ensure the safety of employees, contractors, facilities, and property</li> </ul>

Please note, however, that the specific pieces of information that we may have collected about any specific individual may differ due to the nature of the individual's position, role, and benefits. We may have your Personal Information collected by our service providers, including recruiting firms, application processors, background check service providers, and the like.

#### **Purpose for Collection of Personal Information**

The purposes for our collection of Personal Information are described in Table 1.

#### A. Administer the Employee/Contractor Relationship

We need to keep and process Personal Information for normal employment and independent contractor engagement purposes, including identifiers, personal information, and protected classifications. The Personal Information we hold and process will be used for management and administrative uses and only shared with others who have a need to know such information. We will keep and use it to enable us to run our business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, while you are working for us, and after your employment or engagement has ended. This includes using Personal Information to enable us to comply with any legal requirements associated with an employee or independent contractor relationship, to administer payroll, to provide and manage employee benefits, to provide training, to recruit others, to ensure your health and safety, to comply with an employment or service contract, to demonstrate our commitment to equal employment opportunity and fair employment practices, and to otherwise enable you to perform your professional obligations and responsibilities at our company.

#### B. Compliance with Legal Obligations

In certain situations, we may need to collect and process your Personal Information to comply with our legal obligations. These obligations include:

- Tracking demographic information to confirm compliance with equal opportunity and non-discrimination policies and requirements;
- Processing information relating to your health in order to comply with our obligations under applicable employment and safety and health laws;
- Verification of employment;
- Tax obligations;
- Insurance coverage and unemployment; and/or,
- Producing information relevant to any alleged violation of law or in compliance with a subpoena or other valid legal or regulatory request.

#### C. Facilitate Communications

We use various tools and platforms that enable you to communicate with other employees and personnel and to access and share work product and other work-related materials more efficiently.

#### D. Provide Benefits

We collect Personal Information, such as identifiers, protected classifications, and employment information, as is necessary for benefits administration. When you participate in certain benefits programs (as may be applicable to you), we may also generate a log of your activity, track internet and other network activity, and develop a user profile to provide those programs to you in a manner tailored to your preferences.

All benefits may not be available to all personnel, and we will only collect Personal Information to provide a benefit if you are eligible for and enrolled in that benefit. Employees should take care to read the specific terms applicable to any benefits program to understand the specific pieces of information collected.

### E. Ensure Safety

We collect various categories of Personal Information to ensure the health and safety of its employees, contractors, facilities, and property. Some information, such as identifiers, personal information, protected classifications, and possibly biometrics (e.g., fingerprint, image, etc.) under limited circumstances help verify your identity in specific facilities, as well as help screen for indicators of infectious diseases or vaccination status of those entering facilities. Other categories of information, such as geolocation data and sensory data, may assist us with ensuring the security of people, facilities, and property.

### **Sharing and Sale of Personal Information**

We may share your Personal Information with our service providers in order to fulfill a purpose for collecting or using that Personal Information. We have not sold and will not sell your Personal Information for monetary or other valuable consideration, but, our use and disclosure to third parties (such as data analytics providers) within the past twelve months of cookies, other website tracking technologies identifiers (e.g., IP addresses), and Internet or other similar network activity, may be considered a “sale” of Personal Information under the CCPA/CPRA, and therefore, such disclosure may constitute a sale of Personal Information under that statute’s definition.

### **Retention of Personal Information**

Any Personal Information collected by us or our service providers will be retained (i) while considering a candidate for an employment or contractor relationship; (ii) during the period of person’s active employment/engagement; and, (iii) during the post-employment/engagement period as long as retention is reasonably necessary and proportionate to achieve the purposes for which it was collected and not otherwise incompatible with such purposes.

### **Sensitive Personal Information**

Certain categories of Personal Information are deemed “sensitive” under CPRA. We may collect, use, and retain the following categories of “sensitive” Personal Information as described in Table 2 below:

**TABLE 2**

<b>Category</b>	<b>Examples of PI in the Category</b>	<b>Purpose for Use</b>	<b>Retention Period</b>
Identifiers	<ul style="list-style-type: none"> <li>social security number</li> </ul>	Payroll, benefits, and random drug testing program	Term of employment + 7 yrs
	<ul style="list-style-type: none"> <li>driver’s license or state ID number</li> <li>passport number</li> </ul>	Employment verification – I-9 DOT compliance (DOT drivers for the company only)	Term of employment + I-9 requirement
Characteristics of protected classifications under California or federal law	<ul style="list-style-type: none"> <li>racial or ethnic origin (optional, if self-disclosed)</li> </ul>	Self-disclosure	

Category	Examples of PI in the Category	Purpose for Use	Retention Period
Financial/health	<ul style="list-style-type: none"> <li>bank account numbers</li> </ul>	Payroll	Term of employment + 7 yrs

### **Updates to the Notice**

This Notice is subject to periodic revision and updated versions are effective when posted. The current version of this Notice will also be posted (a) for employment and independent contractor position candidates, on our careers website portal at [www.quanex.com/careers](http://www.quanex.com/careers), and, (b) for current employees, on our Qnet website.

We may be subject to certain laws and regulations relating to privacy and information security in more than one jurisdiction. If any term, covenant, condition, or provision of this Notice is held by a court of competent jurisdiction to be invalid, void, or unenforceable, it is the intent of this Notice that the scope of the rights and obligations of the Notice be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable and the remainder of the provisions of the Notice will in no way be affected, impaired, or invalidated as a result.

### **Contact Us**

If you have questions regarding this Notice, please contact your local Quanex HR department.