



APPLICANT PRIVACY POLICY

Last Updated: September 2023

Introduction

Specialized Packaging Group, together with its subsidiaries and affiliates (collectively, “**SPG**”, “**Company**”, “**us**” or “**we**”) respects your privacy and is committed to protecting it through our compliance with this Applicant Privacy Policy.

This Applicant Privacy Policy describes the types of information we may collect from you or that you may provide when you visit SPG’s careers website (the “**Careers Site**”), when you create an account with us to use the Careers Site, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This privacy policy is part of the main **Privacy Policy** set forth on our website (the “**Website**”) and forms part of that **Privacy Policy**, which in turn is part of the **Terms of Use** applicable to the use of our Website. Please review this privacy policy together with the main body of the **Privacy Policy** and the **Terms of Use**, to understand all of your rights and obligations, and how we operate our Careers Site.

As described below, if you apply for a job through the Careers Site, Company’s use of the personal information you provide will be subject to additional terms outlined in the **Applicant Agreement**.

Our Careers Site is designed to help you find and apply for job openings and guide you through the various steps of our recruitment and onboarding processes.

This privacy policy applies to information we collect:

- On the Careers Site;
- In email, text, and other electronic messages between you and the Careers Site;
- Through mobile and desktop applications, if any, that you download from the Careers Site; and
- Through any other means associated with or relating to the Careers Site.

This privacy policy does not apply to information collected by:

- us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Careers Site, if any.

Please read this privacy policy carefully, together with the main **Privacy Policy**, to understand our policies and practices regarding your information and how we will treat it. If you do not agree with



our policies and practices, your choice is not to use our Careers Site. By accessing or using this Careers Site, you agree to the terms of this privacy policy and the Website **Privacy Policy**.

This privacy policy may change from time to time. Your continued use of this Careers Site after we make changes is deemed to be acceptance of those changes, so please check the privacy policy periodically for updates.

Information We Collect About You and How We Collect It

Please see our Website **Privacy Policy** for a general description of what information we may collect about you when you use the Website, some of which is considered “**personal information**” pursuant to applicable law).

In addition, if you register on our Careers Site (e.g., if you apply for a job or search jobs), the following information may be collected¹:

- Name, address, telephone number, e-mail address, and other contact information;
- Account username and password;
- Social Security Number, National ID number or another similar identifier;
- Employee ID numbers and information about your work history with SPG if you are a current or former employee;
- Resume, cover letter, previous work experience, and education information;
- Employment preferences, salary information, and how you heard about the Careers Site;
- Professional and other work-related licenses, permits, and certifications held;
- Languages and other relevant skills;
- Demographic information;
- Awards and professional memberships;
- Work authorization status and available start date; and
- Details of your job search, including what roles, departments, and locations interest you.

We collect this information:

- Directly from you when you provide it to us, such as when filling in forms on the Careers Site (including when you register for an account, subscribing to a service, or requesting something from us, or when you fill out surveys).
 - Automatically as you navigate through the Careers Site, including through the use of cookies, web beacons, and other tracking technologies (including information about your network or computing device);
 - From third parties, for example, our business partners, suppliers or service providers;
 - Records and copies of your correspondence (including email addresses), if you contact us through the Careers Site;
 - When you run searches on our Careers Site; and
 - When you contact our customer service agents, if available.
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Note that the information we request as part of the recruitment process may vary by job location and may change from time to time.

Prior to submitting your application, you may be asked to review and agree to a localized employee privacy policy or applicant agreement through our Careers Site, which describes how local affiliates will handle your personal information and any applicable location-specific laws. Any employment-related decisions will be made by the applicable hiring affiliate(s) in accordance with the laws of the jurisdiction where the job will be located.

For additional details on what personal information is collected and how it will be used during the application process, read the full terms of the **Applicant Agreement** prior to submitting a job application or supplying any information about your references to Specialized Packaging Group.

Any information you submit through the Careers Site must be true, complete, and not misleading. Should the information provided be inaccurate, incomplete, or misleading, subject to applicable law, this may lead to a rejection of your application during the application process or disciplinary action, including immediate dismissal if you have been employed. In addition, it is your responsibility to ensure that information you submit does not infringe on any third party's rights or violate anyone else's rights of publicity, privacy or other legal rights.

Information from Other Sources

For the purpose of background checks and verifying the information you submitted in connection with your application, in each case as permitted by applicable law, we may obtain information about you from other sources, including from:

- Your references or third parties mentioned in your application;
- Prior employers; and
- Educational institutions you attended.

If you provide us with details of a reference or any other third party along with your resume, it is your responsibility to obtain consent from that third party prior to sharing this personal information with us.

Automatic Data Collection Technologies

Please see our Website **Privacy Policy** for a description of automated data technologies, and how we use them on our Website, and for information about Google Analytics and how Google might use your information they collect on the Website and Careers Site.

Do Not Track

Please see our Website Privacy Policy to see how the Careers Site respond to DNT settings.

Third-Party Use of Cookies and Other Tracking Technologies



Some content or applications, including advertisements, on the Careers Site may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Careers Site. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We may use information that we collect about you or that you provide to us, including any personal information:

- To present our Careers Site and its contents to you;
- To provide you with information, products, or services that you request from us;
- To fulfill any other purpose for which you provide it;
- To provide you with notices about your account and/or the Careers Site;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection, if needed;
- To notify you about changes to our Careers Site or any products or services we offer or provide though it;
- Allow you to register on the Careers Site;
- Process your application;
- Assess your capabilities and qualifications for a job;
- To allow you to participate in interactive features on our Careers Site, if any;
- Allow you to search and apply for jobs at any of our locations;
- Manage the recruitment process in accordance with the terms of the applicable employee privacy agreement;
- Conduct reference checks;
- Manage, evaluate, and improve SPG's recruiting and onboarding tools and processes;
- Provide you with a job offer or an employment agreement and assist with any contract finalization and execution;
- For behavioral tracking, profiling and advertising;
- For any other purpose as needed for our business;
- In any other way we may describe when you provide the information;
- For any other purpose with your consent;
- To contact you about our own and third-parties' goods and services that we think may be of interest to you; and
- To enable us to display advertisements to our advertisers' target audiences.
- Help us meet and document SPG's recruitment goals;
- Meet recordkeeping and internal and external reporting responsibilities;



- Conduct background checks if you are offered a job, as permitted by applicable law; and
- Protect the security and stability of our Careers Site.

Your personal information will be added to SPG's candidate database and will be used for the purposes of considering whether your profile is suitable for other job vacancies at SPG other than the one(s) for which you have applied. If we make you an offer, your personal information will be incorporated into our human resources system and used to manage the new-hire process, and if you become an employee, any such information will become part of your employee file and will be used for other employment-related purposes.

The provision of personal information on the Careers Site is voluntary. However, if you do not provide sufficient information, this may result in us being unable to consider your employment application or, if employment is offered, your subsequent promotion, transfer, or relocation.

Additionally, if you are an employee of SPG, we may use your information as required to abide by our internal policies, including but not limited to our employment and human resources policies. Information received from SPG's employees on our Careers Site may be supplemented with information received offline, such as your contact information; your birthdate; and details about your employment, such as what team you work on, where you work, and how long you have worked for SPG. The sharing of offline information is governed by the terms of the relevant employment policies, employee privacy policies/notices, and local laws and regulatory requirements of your job's jurisdiction.

Aggregated Information

We may aggregate and/or anonymize personal information so that it will no longer be considered personal information. We do so to generate other data for our use, which we may use and disclose for any purpose. For example, we may calculate the percentage of our site users who have a particular telephone area code.

Updating Personal Information

We prefer to keep your personal information accurate and up to date. If you would like to change your contact information, please update your personal information by logging in, or contact us at talent@spg-ges.com. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable (but we may retain prior information as business records).

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates;



- To contractors, service providers, and other third parties we use to support our business and assist us in providing services and offering our products;
- To social media platforms, if you choose to connect your account with any social media pages, or if you log in to your account on the Careers Site through those accounts (if such functionality is available to you);
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets or stock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our Careers Site users is among the assets transferred;
- To third parties to market their products or services to you;
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information; and
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request;
- To enforce or apply the Terms of Use, including this privacy policy, and any other agreements between us, including for billing and collection purposes; and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Data Security

Please see our Website **Privacy Policy** to see how we attempt to secure your information.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account, if applicable. We may also post a notice on the Careers Site home page. The date this privacy policy was last revised is identified at the top of this page. You are responsible for periodically visiting our Careers Site and this privacy policy to check for any changes.

California Privacy Rights

Please see our Website **Privacy Policy** to see your rights under the California Consumer Privacy Act, if you are a California resident, and for information about our data collection, handling and sharing practices.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: talent@spg-ges.com