

Privacy Notice for Applicants

Effective Date: December 4, 2023

1 Scope and Overview

Constantia Blythewood LLC (“Constantia,” we,” “us,” or “our”) respects your privacy and is committed to protecting it through our compliance with this privacy notice (“Privacy Notice” or “Notice”). This Privacy Notice describes how Constantia collects and processes personal information about you during and after your application for employment. This Privacy Notice applies to current and former applicants for employment only.

2 The information We Collect About You and How We Collect It

We collect several types of information from and about you, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, and other identifiers by which you may be contacted online or offline (“personal information”).

We collect this information:

- Directly from you when you voluntarily provide it to us.
- From third parties, including recruiting service providers, background check providers, and former employers.

3 Information You Provide Us

The information we collect may include:

- Registration details such as username, password, and email address for the purposes of creating your user account on our job portal.
- Personal contact details such as name, salutation, title, address, telephone number, and email address;
- Date and place of birth;
- Certificates;
- Achievements;
- Departments of interest;
- Photograph;
- Other personal details included in a CV, cover letter, reference letter, motivation letter, application email, or other documents that you voluntarily provide to us;
- Information related to how you heard about the position for which you are applying (including whether the position was recommended to you by an employee of Constantia, and, if yes, that individual’s name);
- Earliest start date;

- Any other information or comments you voluntarily submit to us;
- Correspondence with us regarding your application;
- Your job alerts and bookmarks;
- Your talent profile;
- Gender;
- Nationality;
- Position;
- Remuneration information, (including salary expectations);
- Qualifications information (e.g., education, professional experience, language skills, further training, and special knowledge and skills);
- Information regarding previous employment relationships (e.g., period, name of activity, and references);
- Work permit / residence title;
- Health suitability (if relevant for the advertised position)

4 How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, in the following ways:

- To process and assess applications for employment, and, if necessary, to subsequently establish the employment relationship;
- To assess qualifications for a particular job or task or to otherwise assess your ability to work;
- To facilitate business management and planning;
- To comply with applicable law;
- To carry out our obligations and enforce our rights arising from any contracts with you, including for the conduct of legal proceedings;
- To protect our interests, including for the purposes of protecting employees, customers, suppliers, business partners, and Constantia's property, and including through the use of video surveillance or other measures for operational safety (e.g., in the case of job interviews taking place at Constantia's premises);
- In any other way we may describe when you provide the information;
- For any other purpose with your consent.

5 Disclosure of Your Information

We may disclose aggregated information about our applicants, 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 Notice:

- To our subsidiaries and affiliates.
- To public authorities.

- To contractors, service providers, and other third parties we use to support our business, including: technology solutions providers (including IT service providers and cloud service providers), recruiting service providers, and education program providers.
- 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 Constantia's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Constantia about our applicants is among the assets transferred.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- We may also disclose your personal information:
 - To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
 - To enforce or apply our agreements with you.
 - If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Constantia, our customers, or others.

6 Choices About How We Use and Disclose Your Information

Applicants residing in California may have certain rights regarding their personal information. For more information, please see the below California Privacy Policy.

7 Data Security and Retention

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to our portal, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information, including any information transmitted to or through our portal. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our portal or any other of our digital properties.

We retain your information for as long as needed: (i) to conduct business with you; (ii) as needed for the purposes outlined in this Privacy Notice; and (iii) as necessary to comply with our legal obligations, resolve disputes, and enforce any agreements.

8 Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any material updates.

9 How to Contact Us

Should you have questions or concerns about this Privacy Notice and our privacy practices, please feel free to contact us at Office.Blwd@cflex.com

10 California Privacy Policy

The following disclosures are made pursuant to the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (“CCPA”). These disclosures apply to applicants who reside in the State of California and supplement any other privacy notices we previously or contemporaneously provided to you, including any California-specific privacy notice provided to you. Any terms defined in the CCPA have the same meaning in this Privacy Notice.

Right to Know

California residents have the right to be informed of the categories and specific pieces of personal information collected about them, including sensitive personal information, collected, used, and disclosed, the categories of sources from which that information is collected, whether that information is sold or shared, the categories of third parties to whom that information has been disclosed, the business or commercial purposes for collecting and using each category of personal information, and the intended retention period for each category of personal information.

The below chart reflects the categories of personal information we have collected from California residents, the categories of sources from which the information was collected, the business or commercial purpose for which the information was collected, the categories of third parties with whom we disclosed that information, and our anticipated retention period for each category of information. Please note that in some situations, we may need to retain certain categories of personal information for longer than the disclosed period in order to comply with our legal or regulatory obligations, resolve disputes, defend against legal claims, or in other exigent circumstances.

Personal Information Category set forth in Cal. Civ. Code § 1798.140	Source(s) of Personal Information Collection	Business or Commercial Purpose(s) for Collection/Use	Third Parties, Service Providers, and Contractors Receiving Personal Information Category	Retention Period
Personal identifiers , including real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers.	Directly from you; recruiting service providers.	Meet our legal obligations; collect and process applications for employment; perform human resource management; communicate with you; protect and secure our workforce and environment.	Meet our legal obligations; collect and process applications for employment; perform human resource management; communicate with you; protect and secure our workforce and environment.	For the duration of the application process and, in the event of rejection, for up to six months after completion of the application process, unless you have given us your consent to store it for a longer period (e.g., one year as part of Constantia's talent pool or in connection with an unsolicited application).
California Customer Records personal information (Cal. Civ. Code § 1798.80(e)), including name, signature, physical characteristics or description, address, telephone number, education, employment, employment history, or medical information	Directly from you; recruiting service providers.	Meet our legal obligations; collect and process applications for employment; perform human resource management; communicate with you; protect and secure our workforce and environment.	Affiliates; technology solution providers; recruiting service providers; education program providers.	For the duration of the application process and, in the event of rejection, for up to six months after completion of the application process, unless you have given us your consent to store it for a longer period (e.g., one year as part of Constantia's talent pool or in connection with an unsolicited application).
Characteristics of protected classifications under California or federal law.	Directly from you; recruiting service providers	Meet our legal obligations; collect and process applications for employment; perform human resource management.	Meet our legal obligations; collect and process applications for employment; perform human resource management.	For the duration of the application process and, in the event of rejection, for up to six months after completion of the application process, unless you have given us your consent to store it for a longer period (e.g., one year as part of Constantia's talent pool or in connection with an unsolicited application).

<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>We do not collect.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>Biometric information.</p>	<p>We do not collect.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information about individual interactions with an Internet website, application, or advertisement.</p>	<p>Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/. Please consult our website privacy policy for more information.</p>	<p>Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/. Please consult our website privacy policy for more information.</p>	<p>Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/. Please consult our website privacy policy for more information.</p>	<p>Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/. Please consult our website privacy policy for more information.</p>

Geolocation data.	Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/ . Please consult our website privacy policy for more information.	Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/ . Please consult our website privacy policy for more information.	Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/ . Please consult our website privacy policy for more information.	Applicants who visit jobs.cflex.com will be subject to the privacy policy applicable to that website, available at https://www.cflex.com/privacy-policy/ . Please consult our website privacy policy for more information.
Sensory data including audio, electronic, visual, thermal, olfactory, or similar information.	Indirectly from you.	Perform human resource management; protect and secure our workforce and environment.	Affiliates; technology solution providers.	For the duration of the application process and, in the event of rejection, for up to six months after completion of the application process, unless you have given us your consent to store it for a longer period (e.g., one year as part of Constantia's talent pool or in connection with an unsolicited application).
Professional or employment-related information.	Directly from you; recruiting service providers.	Meet our legal obligations; collect and process applications for employment; perform human resource management.	Affiliates; technology solution providers; recruiting service providers; education program providers.	For the duration of the application process and, in the event of rejection, for up to six months after completion of the application process, unless you have given us your consent to store it for a longer period (e.g., one year as part of Constantia's talent pool or in connection with an unsolicited application).

<p>Non-public education information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 C.F.R. Part 99).</p>	<p>Directly from you; recruiting service providers.</p>	<p>Meet our legal obligations; collect and process applications for employment; perform human resource management.</p>	<p>Affiliates; technology solution providers; recruiting service providers; education program providers.</p>	<p>For the duration of the application process and, in the event of rejection, for up to six months after completion of the application process, unless you have given us your consent to store it for a longer period (e.g., one year as part of Constantia's talent pool or in connection with an unsolicited application).</p>
<p>Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>We do not collect.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>

Sensitive Personal Information Category as set forth in Cal. Civ. Code § 1798.140	Sources from which Information was Collected	Purposes for Collection; Use	Third Parties, Service Providers, and Contractors Receiving Personal Information	Retention Period
Social security number, driver's license number, state identification card, or passport number.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Account access credentials (user names, account numbers, or card numbers combined with required access code, security code or password to access an account).	Directly from you.	Meet our legal obligations; collect and process applications for employment; perform human resource management; protect and secure our workforce and environment.	Affiliates; technology solution providers; recruiting service providers.	For the duration of the application process and, in the event of rejection, for up to six months after completion of the application process, unless you have given us your consent to store it for a longer period (e.g., one year as part of Constantia's talent pool or in connection with an unsolicited application).
Precise geolocation (location within a geographical area of a circle with a radius of 1850 feet or less).	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Racial or ethnic origin.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Religious or philosophical beliefs.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Union membership.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Genetic Data.	We do not collect.	We do not collect.	Not applicable.	Not applicable.
Mail, email, or text messages where the content is not directed to us.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Unique identifying biometric information.	We do not collect.	We do not collect.	Not applicable.	Not applicable.

Personal information collected and analyzed concerning health.	We do not collect.	We do not collect.	Not applicable.	Not applicable.
Personal information collected and analyzed concerning sex life, or sexual orientation.	We do not collect.	We do not collect.	Not applicable.	Not applicable.

Right to Limit Use and Disclosure of Sensitive Personal Information

We do not collect or process sensitive personal information for the purpose of inferring characteristics about applicants. We also do not disclose sensitive personal information for purposes other than those specified in section 7027(m) of the CCPA regulations promulgated by the California Privacy Protection Agency. Therefore, we do not offer you the option to limit the use of your sensitive personal information.

Right to Opt Out of Sharing for Cross-Context Behavioral Advertising

We do not share information belonging to applicants for the purposes of cross-context behavioral advertising. Therefore, we do not offer you the option to opt out of the use of your personal information for cross-context behavioral advertising.

Right to Opt Out of Sale

We do not sell personal information belonging to applicants. Therefore, we do not offer you the option to opt out of the sale of your personal information.

We have no actual knowledge of selling the personal information or the sensitive personal information or minors under 16 years of age.

Right to Delete Personal Information

You have the right to request the deletion of your personal information, subject to certain exceptions.

Right to Correct Inaccurate Personal Information

You have the right to request the correction of any inaccurate personal information that we maintain about you.

Right to Access

You have the right to request the categories and specific pieces of personal information we have collected about you.

Right of Non-Retaliation and Non-Discrimination

You have the right to exercise the privacy rights conferred to you under the CCPA without receiving retaliatory or discriminatory treatment. Constantia does not retaliate or discriminate against you for exercising the privacy rights conferred to you under the CCPA.

Exercising Your Rights

To exercise your rights, you may contact us via phone at (803) 404-6581 or e-mail at office.blwd@cflex.com. Requesters will need to provide us with personal information in order to verify their identity and residency, including name, e-mail, and state of residence. We will compare the information you provide with our internal records. The personal information that we use to verify identity and residency will not be used for any other purpose.

You may authorize an agent to submit a request on your behalf if you provide the authorized agent with written permission signed by you. Constantia may require you to verify your identity directly with us and confirm that you provided the authorized agent with permission to submit a request on your behalf.