



OPEX Corporation ("OPEX," the "Company," "we," "our," or "us")
Human Resources Privacy Notice – California

VERSION 2.0; LAST UPDATED 17 OCTOBER 2025

PURPOSE OF THIS NOTICE: This Human Resources Privacy Notice ("**Notice**") describes our collection and use of certain personal information relating to our employees and applicants or candidates for employment with us, in each case, who are California residents ("**CA Residents**"). This notice is intended to satisfy our obligation under the California Consumer Privacy Act (the "**CCPA**") to provide notice to CA Residents concerning the personal information we collect about them. Under the CCPA, "personal information" is 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 California Resident or household.

SCOPE OF THIS NOTICE: This Notice applies to the following personal information that we collect relating to CA Residents:

- Personal information about CA Residents that we collect and use in the context of their application for employment or working relationship with OPEX;
- Emergency contact information for such CA Residents that we collect and use for emergency contact purposes;
- Other personal information that we collect to administer benefits that the Company makes available to CA Residents.

NOT COVERED IN THIS NOTICE: This Notice does not address or apply to our collection, use, or disclosure of any of the following information about CA Residents:

- Protected health information, subject to HIPAA or the California Medical Information Act (please refer to the OPEX Policy Manual to learn how we handle protected health information);
- If applicable, consumer report information that is subject to the Fair Credit Reporting Act (the "**FCRA**"), or that we disclose to obtain a consumer report under the FCRA;
- Publicly available data that is lawfully made available from federal or state government records;
- Other personal information that is exempt from the CCPA.

CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED: We collect the following categories of personal information (as set forth in the CCPA) about CA Residents, in the context of managing their working relationship or job application with us and may disclose each category to a service provider or contractor for a business purpose:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier, Internet Protocol address when logging into the Company's systems, personal email address, social security number, driver's license number, passport number, and other similar identifiers.
- **Personal Information (as defined in §1798.80(e)):** personnel records information, including employment information (e.g., salary, other compensation, and incentives), bank account number or other financial information (e.g., bank details, frequency of payment of payroll, and business expenses), social security contribution information, tax forms, health insurance information (e.g., benefits and beneficiary details), as well as information about family members, dependents, or other designated persons provided for emergency contact, insurance, or benefits purposes.



- **Protected Classifications:** characteristics of protected classifications under California or federal law such as race, color, sex, age, national origin, disability, citizenship status, and marital status.
- **Commercial information:** purchase or transaction history related to your use of corporate credit cards (if any) and other employer-provided programs (if applicable).
- **Internet or Other Electronic Network Activity Information:** Internet or other electronic network activity information over Company-owned and/or -provided systems or devices, including, but not limited to, access logs, browsing history, search history, information regarding a CA Resident's interaction with an Internet website, application, or advertisement, download/print records, call/voicemail logs, and communications including chat or texts over platforms such as Microsoft Teams.
- **Geolocation Data:** precise geographic location information about a CA Resident or device, such as the location of a company-provided laptop or other device when connected to our corporate Wi-Fi or when accessing company systems.
- **Audio, Electronic, Visual, or Similar Information:** audio, electronic, visual, or similar information such as when we include your photo in your professional profile in Company systems such as Microsoft Outlook, when such information appears in other corporate communications systems, directories, and newsletters accessible to employees of the OPEX group of companies worldwide, when such information appears in our external promotional materials distributed outside of the OPEX group of companies, or when such information is included in recorded interviews, trainings, webinars, or other similar recordings.
- **Professional or Employment-Related Information:** professional or employment-related information, including, without limitation, resume/CV, personal questionnaire, professional references, motor vehicle record (MVR), employee ID (if any), supervisor/subordinate relationships, training records, certifications, performance reviews, disciplinary records, post-employment contract information, severance arrangements, and succession planning information. We may, for example, include your job title and contact information in systems such as Microsoft Outlook and/or in other corporate communications systems or directories accessible to employees of the OPEX Group of companies worldwide.
- **Education Information:** information about education history or similar background information that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
- **Profiles and Inferences:** inferences drawn from any of the information identified above to create a profile about a CA Resident reflecting the Resident's preferences, characteristics, workplace behavior, abilities, and aptitudes.

We may disclose each category of personal information listed above to the following categories of third parties for a business or commercial purpose: advisors and agents, affiliates and subsidiaries, benefits providers, regulators, government entities and law enforcement, Internet service providers, operating systems, and platforms, or others as permitted by law.

- **Sensitive Personal Information:** sensitive personal information including social security number, driver's license number, passport number, race, national origin, criminal record/background check results, personal information collected and analyzed concerning your health (e.g., drug/alcohol screening results, workplace health and safety information, medical or disability information), the contents of mail, email, and text messages [when OPEX is not the intended recipient], and leave-related information (PTO, FMLA, accommodations, etc.).



We may disclose sensitive personal information to the following categories of third parties for a business or commercial purpose: advisors and agents, affiliates and subsidiaries, others as permitted by law.

PURPOSES FOR COLLECTING AND USING PERSONAL INFORMATION: We use the above categories of personal information for the following purposes:

- ***Management of Job Applications, Recruiting, and Hiring.*** To review, assess, recruit, consider or otherwise manage applicants for employment or contractor positions, including:
 - Scheduling and conducting interviews
 - Identifying candidates, including by working with external recruiters
 - Reviewing, assessing and verifying information provided, drug/alcohol screening results, conducting criminal and background check result (which may include sensitive personal information such as government identifiers or criminal history), and otherwise screening or evaluating applicants' qualifications, suitability and relevant characteristics
 - Satisfying legal and regulatory obligations
 - Communicating with applicants regarding their applications and about other similar position(s) in which they may be interested
 - Maintaining applicant personal information for future consideration
 - In support of our equal opportunity employment policy and practices
- ***Management of Working Relationship.*** For the purpose of:
 - Making hiring and promotion decisions, taking disciplinary actions and terminating employees
 - Conducting performance, compensation and bonus reviews
 - Conducting headcount and salary reviews
 - Administering and monitoring compliance with Company policies and procedures
 - Maintaining records of emergency contact information for use in administering benefits or the event of an emergency
 - Complying with workplace health and safety obligations, including maintaining records of workplace incidents, ensuring a safe work environment, and meeting applicable legal and regulatory requirements
 - Administering or performing employment contracts if applicable
 - Conducting pre-employment and employment screening
 - Professional development and training purposes
 - Verification and management of credentials, licensing and other qualifications related to roles and responsibilities of CA Residents
 - Facilitating employee communication and collaboration, such as through the corporate directory, employee bios, and other similar communications
 - Our equal opportunity employment policy and diversity and inclusion program
- ***Compensation and Benefits Administration.*** Administration of compensation and benefits, including:
 - Administering employee payroll, salary, and compensation which requires collecting and using personal records information such as bank account details, tax information, and benefits enrollment records, including potentially sensitive personal information
 - Administering corporate credit card, travel, expense reimbursement, and other employer-provided programs (if applicable)
 - Calculating deductions, issuing tax return-related documents and forms
 - Administering pensions, IRAs and 401K, health insurance, medical plans, and other benefits (which may include the collection of personal information about others such as beneficiaries, where necessary to administer such benefits)

- Monitoring and managing PTO, holidays, FMLA, and other leaves of absence
- Reviewing, assessing and administering salary and compensation increases and bonuses
- **Conducting Business and Management of Customer Relationships.** The organization and operation of our business, including:
 - Operating our business and the business of other OPEX group companies by developing, producing, marketing, selling and providing products and services
 - Providing information technology ("IT") and information processing support and IT applications and systems maintenance
 - Providing after-sales service to customers
 - Embossing the manuals that our technicians provide to our customers with the technician's name and employee identification number
 - Auditing and assessing the performance of business operations, including after-sales service and associated activities
 - Training and quality control
 - Satisfying customer reporting and auditing obligations if any
 - Facilitating business development opportunities, as relevant
 - Facilitating communications in furtherance of the foregoing
- **Security and Monitoring.** To monitor and secure our resources, network, premises, and assets, including:
 - Monitoring for, preventing and investigating suspected or alleged misconduct or violations of workplace rules
 - Monitoring for, preventing investigating, and responding to security and privacy incidents
 - Providing and managing access to physical and technical access controls
 - Monitoring activities, access, and use to ensure the security and functioning of our systems and assets
 - Securing our offices, premises and physical assets, including through the use of electronic access systems and premises video monitoring
- **Auditing, Reporting Corporate Governance, and Internal Operations.** Relating to financial, tax, and accounting audits, and audits and assessments of our business operations, security controls, financial controls, or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.
- **M&A and Other Business Transactions.** For purposes of planning, due diligence, and implementation of commercial transactions, for example, mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization, or other similar business transactions, if any.
- **Defending and Protecting Rights.** To protect and defend our rights and interests and those of third parties, including to manage and respond to employee and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend, or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.
- **Compliance with Applicable Legal Obligations.**
 - Relating to compliance with applicable legal obligations (such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, social security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance.
 - Collecting and using sensitive personal information as reasonably necessary and proportionate to achieve the purposes described above, including payroll, benefits administration, background checks, security, and compliance with applicable laws.



SOURCES OF PERSONAL INFORMATION: In general, we may collect CA Residents' personal information from the following categories of sources:

- Directly from you
- Referrals and references
- Recruiters and recruiting platforms
- Publicly available information
- Governmental sources (e.g., California Department of Motor Vehicle)
- Other employees
- Service providers, representatives, and agents
- Affiliates and subsidiaries

SALE AND SHARING OF PERSONAL INFORMATION: The CCPA defines "sale" as disclosing or making available personal information to a third-party in exchange for monetary or other valuable consideration, and "sharing" includes disclosing or making available personal information to a third-party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, we may "sell" or "share" the categories of personal information such as: personal contact details, other identifiers, location information (e.g., your IP address), professional and employment-related information, education information, and Internet or network activity information collected through HR portals or other systems. We may sell or share these categories to recruiting vendors, benefit vendors, training vendors, and other vendors, third-party advertising networks, analytics providers, and social networks for purposes such as managing recruiting, employment, benefits, compliance, internal analytics, and to better understand activity on the opex.com website and other recruiting platforms. We do not sell or share sensitive personal information, nor do we sell or share personal information about individuals we know are under age sixteen (16).

SENSITIVE PERSONAL INFORMATION: Notwithstanding the purposes described above, we do not collect, use, or disclose "sensitive personal information" beyond the collection of such information described as collected by us under "Sensitive Personal Information" above, for purposes permitted by the CCPA.

RETENTION OF PERSONAL INFORMATION: We retain your personal information for as long as needed or permitted, based on the reason we obtained it (consistent with applicable law). When deciding how long to keep your personal information, we consider whether we are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period before we can delete them) or whether we have taken any legal positions (e.g., issued any legal holds or otherwise need to preserve the information). Rather than delete your data, we may also deidentify it by removing identifying details. Where we have committed to maintaining and using personal information in a deidentified form, we agree not to reidentify deidentified data except as permitted by applicable law.

CA RESIDENTS' RIGHTS: California law grants CA Residents certain rights and imposes restrictions on particular business practices as set forth below. Subject to certain conditions and exceptions, CA Residents have the following rights with respect to their personal information:

- **Right to Know (Access & Portability).** You have the right to request:



- the categories or personal information we collected about you;
- the categories of sources from which the personal information is collected;
- our business or commercial purposes for collecting, selling, or sharing personal information;
- the categories of third parties to whom we have disclosed personal information; and
- a copy of the specific pieces of personal information we have collected about you.
- **Right to Correct.** You have the right to request that we correct inaccurate personal information.
- **Right to Delete.** You have the right to request that we delete your personal information.
- **Right to Opt-Out of Sales and Sharing.** You have the right to opt-out of “sales” and “sharing” of your personal information as those terms are defined under the CCPA.
- **Right to Access and Opt-Out of ADMT.** We do not use automated decisionmaking technology (“ADMT”) to make significant decisions about you, thus this right is not available to CA Residents.
- **Right to Limit Use and Disclosure.** We only use “Sensitive Personal Information” for the purposes permitted under the CCPA, thus this right is not available to CA Residents.
- **Right to Non-Retaliation.** We will not retaliate against you for exercising any of the rights described in this section.

Exercising Your Privacy Rights. CA Residents may exercise their CCPA privacy rights as set forth below:

- ***Right to Opt-out of the Sale or Sharing of Personal Information.*** CA residents have the right to opt out of the “sale” or “sharing” of their personal information. To exercise this right, please (1) fill out our webform at <https://www.opex.com/contact-us/> or (2) email our Human Resources Director at jstoner@opex.com, (3) or call 1-856-727-1100 and ask for our Human Resources Director (Jeff Stoner). Please clearly state you are exercising your right to opt out of sale/sharing under the CCPA in your correspondence.
- ***Right to Delete, Correct and Requests to Know/Access.*** CA Residents may submit CCPA requests to delete, correct, and know/access by using our webform, available at <https://www.opex.com/contact-us/>, emailing us at jstoner@opex.com, or calling 1-856-727-1100.

When you submit a request, we will take steps to verify your identity and request by matching the information provided by you with the information we have in our records. We will process your request based upon the personal information in our records that is linked or reasonably linkable to the information provided in your request. In some cases, we may request additional information in order to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

You may also designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents will be required to provide proof of their authorization in their first communication with us, and we may also require that the relevant CA Resident directly verify their identity and the authority of the authorized agent.



CHANGES TO OUR PRIVACY NOTICE: We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through an updated notice on our website.

CONTACTING US ABOUT THIS NOTICE: If you have any questions or concerns regarding our use of personal information as described in this Notice, please contact us by using our webform, available at <https://www.opex.com/contact-us/>, emailing our Human Resources Director at jstoner@opex.com, or calling our Human Resources Director (Jeff Stoner) at 1-856-727-1100.