

# WORK FORCE PRIVACY POLICY

**Effective Date:** October 30, 2023

**Last Updated:** October 30, 2023

The Privacy Policy describes how OEM Logistics, LLC (“OEM” “we” and “us”) processes personal information that we collect in connection with your application to work for us or your employment with us. If you have any questions or if you have a disability and need to receive this Privacy Policy in a different format, please contact us at [privacy@oemlogisticsllc.com](mailto:privacy@oemlogisticsllc.com)

**BY SUBMITTING AN APPLICATION, ACCEPTING AN OFFER OF EMPLOYMENT, BECOMING A MEMBER OF OUR WORKFORCE, OR PROVIDING PERSONAL INFORMATION TO US IN THE COURSE OF YOUR EMPLOYMENT, YOU UNDERSTAND AND AGREE THAT WE WILL COLLECT, USE, AND DISCLOSE PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.**

## Categories of Personal Information We Process

We may collect the below categories and types of personal information.

- **Contact Information:** name, postal address, telephone number, and email address. We may also collect this information for your emergency contacts and references.
- **Identifiers:** social security number, driver’s license number, employee number signature, passport number, state identification card number, I-9 documentation, IP address, social media user names, and account username and password.
- **Characteristics of Protected Classifications:** date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, sexual orientation, military or veteran status, disability information, genetic information, or pregnancy and related information.
- **Financial Information:** financial or bank account information.
- **Audio/Visual Data:** audio, electronic, photographic, visual or similar data including videos, photographs, or audio recordings.
- **Internet or Electronic Usage Data:** information relating to your use of our IT systems including your website activity and IP address.
- **Professional or Employment Information:** resume, job application details, previous work history, references and professional memberships.
- **Non-public Education Information:** education history, degrees, and transcripts.
- **Health Insurance Information:** health insurance information such as your policy number and spouse or dependent information, if applicable.
- **Medical Information:** information about your medical and treatment history, diagnosis, dates of service, provider name, and your ability to perform certain tasks or to work.
- **Physical or Drug Screenings:** physical screenings or drug test results, if your application or position required such screenings or testing.

## Sources of Personal Information

We may collect personal information in the below ways.

- **Directly from you:** information that you provide directly to us.
- **Automatically:** internet or electronic usage data relating to your use of our IT systems.
- **From third-parties:** third parties including recruiters, LinkedIn, vendors, service providers, your references, and other employees.

## Purposes for Collecting Personal Information

We may use personal information for the following purposes:

- **Recruiting and Hiring:** to make informed decisions on recruitment, assess your suitability for the role, communicate with you about your application, respond to your inquiries and schedule interviews, and to reimburse you for any agreed expenses incurred in the application process.
- **Background Checks and Pre-Employment Screenings:** to complete a background check to or pre-employment physical.
- **Onboarding:** to complete our contract with you, enroll you in our databases, provide communication services, provide you access to our offices and IT systems and administer your personnel records.
- **Benefits:** We use contact information, identifiers, personal characteristics or traits, audio/visual data, professional or employment information, non-public education information, medical information, health insurance information and sensitive personal information to create benefits packages and provide and administer benefits.
- **Payroll:** to track your time and attendance and to pay you and reimburse you for expenses.
- **Leave and Accommodation Requests:** to evaluate and process time off, sick leave, leaves of absence, or accommodation requests, if you make such requests.
- **Business Operations:** for purposes of maintaining records, planning, budgeting, calibration, headcount, database administration, diversity metrics, surveys, evaluations, reports, legal claims, compliance, regulatory, audit, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting tools, and support our business operations.
- **Analytical Purposes:** to analyze trends and statistics, including analyzing and monitoring the equality, diversity and inclusivity of our consultant workforce (as permitted by local law).
- **Maintenance and Improvement of our Systems:** to improve our systems, provide and maintain functionality on our systems, and help us diagnose technical and service problems and administer our systems.
- **Security and Fraud Prevention:** to: (i) protect our Sites, premises, assets, systems, products, services and intellectual property; (ii) detect and guard against fraud, theft, and other misconduct; and (iii) conduct due diligence.
- **Legal:** to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes:** for other reasons we may describe to you.

## How We Disclose Personal Information

We may disclose personal information in the below circumstances.

- **Service Providers:** with vendors and service providers who need access to such information to carry out their work for us (including, for example, cloud hosting providers, marketing vendors, lawyers, bankers, insurers, internet service providers, operating systems and platforms, and recruiters).
- **Government Entities:** with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities.
- **Corporate Transaction Recipients:** with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization,

conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.

## How Long We Keep Personal Information

We will retain and use your information for as long as we need it or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We use the following criteria to determine retention periods: (i) how long the information is needed to provide our services and operate our business; (ii) whether there are contractual or legal obligations that exist that require us to retain the information for period of time; (iii) whether any law, statute, or regulation allows for a specific retention period; (iv) whether an individual has agreed to a longer retention period; (v) whether the data is considered to be sensitive data; and (vi) what the expectation for retention was at the time the data was provided to us.

## Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use website and share information with caution.

## Processing in the United States

Please be aware that information we obtain about you will be processed in the United States by or service providers or us. By using the Sites or our services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

## Contact Us

If you have any questions about this Privacy Policy or our data practices, please email us at [privacy@oemlogisticsllc.com](mailto:privacy@oemlogisticsllc.com).

## Updates to Our Privacy Policy

From time to time we may update our privacy policy. We will notify you of any material changes to our privacy policy as required by law. The “Last Updated” legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post or publish the revised Privacy Policy.