

Employee Privacy Notice

Effective Date/Last Updated: January 1, 2024

In this Employee Privacy Notice ("Notice"), LMI Aerospace, Inc., doing business as Sonaca North America, ("Sonaca NA", "we", or "us") describes the types of information that we collect from employees and job applicants, how we use that information, and how we may share that information.

This Notice does not form part of any contract of employment. Provisions of this Notice dealing with individuals employed by the company are not applicable until they begin working for us.

We may change this Notice from time to time, and we will post changes in an area of our website that is accessible to current and former Sonaca NA employees.

Personal Information We Collect

"Personal Information" means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. We may collect a range of Personal Information, including the following, during the course of your candidacy and employment with us:

- Your name, address, email address, telephone number, and other contact information;
- Your resume or CV, cover letter, previous and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of an application and/or the application and recruitment process;
- Information from interviews you may have, if any;
- Details of the type of employment you are looking for, current and/or desired salary and other terms relating to compensation and benefits packages, and job preferences;
- Details of how you heard about the position you are applying for;
- Any sensitive and/or demographic information obtained during the hiring process such as Social Security number, gender, information about your citizenship and/or nationality, medical or health information, and/or your racial or ethnic origin;
- Reference information and/or information received from background checks (as applicable), including information provided by third parties;
- Information relating to any previous applications you may have submitted to Sonaca NA and/or any previous employment history with Sonaca NA;
- Information about your educational and professional background from publicly available sources that we believe is relevant to your application or a potential future application (*e.g.*, your LinkedIn profile);
- Banking information for direct deposit purposes;
- Income history and income information;
- Benefits information, including information regarding your beneficiaries; and
- Information collected from you automatically when you use our website, while using a company-owned device, or while connected to company internet through cookies, web beacons, pixel tags, and/or other online tracking mechanisms.

Information Collected From Other Sources

We obtain information about individuals from various third-party and public sources and we may combine that data with Personal Information we have. For example:

- Sonaca NA may collect information regarding your work history and candidacy for employment from third-party recruiting portals, such as iCIMS;
- Sonaca NA may collect information regarding your citizenship or eligibility to work in the country where you are employed from government agencies;
- Sonaca NA may collect your drug test results from the third-party services provider to perform applicant and employee drug tests; and
- Sonaca NA may collect tax related information from the Internal Revenue Services or receive financial information in the course of processing garnishments or other transactions.

Children Under 18

We only employ those who are legally eligible to work at the location of employment, which is typically the age of majority (18 years old).

Purposes for Which We Collect Personal Information

Sonaca NA processes your Personal Information as described in this Notice for the following purposes:

- **To Communicate with You.** We may use your Personal Information to provide information to you, to respond to your questions, to notify you of changes to your compensation and benefits program, or to notify you of emergencies.
- **To Manage the Onboarding Process.** Upon being hired by Sonaca NA, we will collect Personal Information when you complete new hire paperwork to assist us in administering salary and benefits and to comply with governmental and legal requirements.
- **To Administer Compensation and Benefits Programs.** We will use the Personal Information you provide to process payroll, pay taxes, help employees address employment-related tax issues, administer benefits and handle work-related expense reimbursement. We may also use this Personal Information to manage requests for disability accommodations. We also use this to administer employee claims such as workers' compensation or unemployment benefits.
- **Recruiting.** We may use Personal Information to communicate with you regarding the recruiting process, to learn where you heard about Sonaca NA, to process internal referrals, and to evaluate and improve our recruiting process.
- **For Performance Management.** We collect Personal Information in order to assess your performance, assist in career development, conduct pay and grading reviews, and to handle any employment-related disputes. We may also use Personal Information to respond to violations of company policies and to gather information for disciplinary actions. We use Personal Information for purposes of the internal performance improvement and disciplinary process and to respond to complaints. We may monitor or track any activity you perform online while using a company-owned device or while connected to the company's internet, such as monitoring the websites you visit and your activity on those websites when using a company device or internet connection. We may also track the emails you send using your company-provided email address, the phone calls you make using a company-provided device, and the chat messages you are involved in using the company-provided instant messaging program.

- **Education and Professional Services.** We may use your Personal Information to assist with education, training and professional development. We may use this information to assist with professional development, working on career development.
- **Law Enforcement and Courts.** We may disclose your Personal Information in response to a subpoena, a search warrant or other legally valid process. We may use your Personal Information to cooperate with law enforcement or other government entities if you are suspected of having violated applicable laws.
- **Record Keeping.** We may use Personal Information to comply with applicable legally required or industry standard business and employment record keeping requirements and to respond to governmental requests for information.
- **Health and Safety.** We use Personal Information to protect your health and safety, or the health and safety of others, including through the use of technology to allow contact tracing if you may have exposed to communicable diseases such as COVID-19. We may also use this information to respond to an employee related emergency. We also use this Personal Information to protect our facilities and personal property.
- **Protect Our Legal Rights.** We may use your Personal Information to protect our legal rights, to defend a claim or lawsuit, and to investigate or prevent actual or suspected loss or harm to persons or property. We may use your Personal Information to seek legal, accounting or other professional advice when necessary to identify, contact, or bring a legal action against someone who may cause or be causing harm to, or interfering with, the legal rights of Sonaca NA or any other party.
- **Security.** We may use your Personal Information to monitor the use of our information systems and electronic resources, to conduct internal audits or investigations and for safety and security of Sonaca NA employees, visitors and facilities. We also may use such information to protect Sonaca NA against illegal activity and misconduct such as fraud, deceptive practices, and data security incidents. We use this to offer, operate, maintain, deliver, troubleshoot and update our websites, programs, network, and systems used by Sonaca NA in the course of its business.

How We Share Your Personal Information

We share your Personal Information in the following circumstances:

- **Within Sonaca NA.** We may share your Personal Information internally within Sonaca NA and among Sonaca NA's affiliates for purposes of resource planning, talent and recruiting, human resources, and business administration functions. All Sonaca NA employees who access or process employee Personal Information are required to comply with Sonaca NA's privacy and security policies.
- **Service Providers.** Sonaca NA may share Personal Information with third-party service providers or suppliers ("Service Providers") that include, without limitation, human resources management service providers such as Workday, payroll service providers, data storage providers, website or mobile application hosting providers, and e-mail service providers as needed to provide the applicable services to us. Sonaca NA will take steps to help ensure appropriate protections are in place before we share or disclose Personal Information with any Service Provider.

- **Legal Requirements.** We will cooperate with law enforcement and other governmental agencies. We may disclose Personal Information for the following legal purposes:
 - If we believe in good faith we are legally required to disclose that Personal Information;
 - If we are advised to disclose Personal Information by our legal counsel;
 - When necessary to identify, contact or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, Sonaca NA or any other party;
 - For tax and payment purpose (e.g. Internal Revenue Service);
 - To protect our rights or property, or to protect your health and safety, or the health and safety of others;
 - To detect and investigate fraud or illegal activity;
 - To respond to a government request; or
 - To respond to an emergency.

- **Professional Advisors.** We may share Personal Information with our professional advisors, such as our attorneys and accountants, in their capacity as advisors, including with respect to potential or actual litigation matters.

- **Change in Ownership.** We may use and disclose Personal Information in connection with the evaluation of a corporate reorganization of Sonaca NA, such as in the event of a merger, acquisition, or asset transaction. We may provide Personal Information both in connection with a due diligence process or it could be transferred as part of a change of control to a subsequent owner(s). If we (or our assets) are acquired or if we go out of business, enter bankruptcy, or go through some other change of control or reorganization, Personal Information and other information could be one of the assets transferred to or acquired by a third party, or reviewed as part of the due diligence process.

De-Identified/Aggregate Information

We may collect or create information that is de-identified or aggregate information that does not identify a natural person ("De-Identified Information"). Sonaca NA is the sole and exclusive owner of De-Identified Information and may use or share such information for any legal business purpose. For example, Sonaca NA may create aggregate information about applicants to learn about the success of its recruiting processes.

Data Security

Sonaca NA makes commercially reasonable efforts to protect employees' and applicants' Personal Information. We protect Personal Information using technical and organizational measures designed to reduce the risks of loss, misuse, unauthorized access, disclosure, alteration, or destruction of Personal Information, as appropriate to the type of Personal Information processed.

Notwithstanding our security safeguards, it is impossible to guarantee 100% security in all circumstances. Sonaca NA employees and applicants are responsible for safeguarding the security of any password, user ID, or other form of authentication involved in obtaining access to password-protected or secure areas of any company-owned or licensed platforms. It is your sole responsibility to use the appropriate level of care whenever communicating with us.

If you have reason to believe that your interaction with us is no longer secure, you must immediately notify us of the problem. If a breach of your Personal Information occurs, we will notify you of the breach if and as required under applicable law. In order to protect you and your Personal Information, Sonaca NA may

suspend your use of any Sonaca NA programs or platforms without notice pending an investigation if any breach of security is suspected.

Retention of your Personal Information

Personal Information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law, taking into consideration any statutorily required minimum periods of time in applicable jurisdictions. Generally, this means your Personal Information will be retained until the end of your employment, or work relationship with us plus a reasonable period of time thereafter to respond to employment or work-related inquiries or to deal with any legal matters, document the proper termination of your employment or work relationship, or to provide you with any ongoing benefits.

Personal Information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our systems and we will also require third parties to destroy or erase such Personal Information where applicable.

California Employees/Applicants

This Section applies to our collection and use of “Personal Information” if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (the “CPRA”). This Section describes (1) the categories of Personal Information, collected and disclosed by us, subject to CPRA, (2) your privacy rights under CPRA, and (3) how to exercise your rights.

If you would like to receive a copy of this Section in an alternate format (e.g., printable) or language, please contact us using the information provided in the Contact Us section below.

Categories of Personal Information

Pursuant to applicable California law, including the CPRA, Sonaca NA makes the following disclosures regarding Personal Information collected and/or sold by us within the preceding 12-month period.

Category of Personal Information	Category of source from which Personal Information is Collected	Purpose of Collection	Category of Service Providers to whom Personal Information is Disclosed	Category of Third Parties to whom Personal Information is Sold or Shared	Retention Period
Identifiers, such as your name, address, and email address.	Individual, third-party background check vendor	See Section above titled “Purposes for Which We Collect Personal Information”	Payroll/HR Management provider, Benefits providers	We do not sell or share your Personal Information.	Applicants: Duration of application process plus 3 years Employees: Length of your

					employment plus 7 years
<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, medical information, or health insurance information.</p>	Individual, third-party background check vendor	See Section above titled "Purposes for Which We Collect Personal Information"	Payroll/HR Management provider, Benefits providers	We do not sell or share your Personal Information.	<p>Applicants: Duration of application process plus 3 years</p> <p>Employees: Length of your employment plus 7 years</p>
<p>Protected classification characteristics under California or federal law, such as Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status,</p>	Individual	See Section above titled "Purposes for Which We Collect Personal Information"	Payroll/HR Management provider, Benefits providers	We do not sell or share your Personal Information.	<p>Applicants: Duration of application process plus 3 years</p> <p>Employees: Length of your employment plus 7 years</p>

medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, and veteran or military status.					
Internet or other similar network activity.	Individual	See Section above titled "Purposes for Which We Collect Personal Information"	None	We do not sell or share your Personal Information.	Not applicable.
Professional or employment-related information.	Individual	See Section above titled "Purposes for Which We Collect Personal Information"	Payroll/HR Management provider, Benefits providers, third-party background check vendors	We do not sell or share your Personal Information.	Applicants: Duration of application process plus 3 years Employees: Length of your employment plus 7 years
Sensitive personal information (e.g. Social Security number, gender, information about your citizenship and/or nationality, medical or health information, and/or your racial or ethnic origin)	Individual	See Section above titled "Purposes for Which We Collect Personal Information"	Payroll/HR Management provider, Benefits providers	We do not sell or share your Personal Information.	Applicants: Duration of application process plus 3 years Employees: Length of your employment plus 7 years

While our standard practice is to retain personal information for the retention periods stated in the above chart, there may be scenarios where we need to retain certain personal information for longer periods of

time. We may need to retain personal information for longer periods of time if we have a legal right or obligation to continue to retain your information, such as in the event of a potential dispute or to ensure proper enforcement of our terms and agreements.

Subject to certain exemptions, if you are a resident of California, you may have the following rights:

Privacy Right	Description
Notice	The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Access	The right to request the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You may also have the right to request the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Data Portability	The right to receive the Personal Information you have previously provided to us.
Erasure	The right to have your Personal Information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your Personal Information internally, in a lawful manner that is compatible with the context in which you provided it.
Correction	You have the right to request that we correct any incorrect Personal Information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers that hold your data on our behalf to correct) your Personal Information from our records, unless an exception applies. We may deny your correction request if (a) we believe the Personal Information we maintain about you is accurate; (b) correcting the information would be impossible or involve disproportionate; or (c) if the request conflicts with our legal obligations.
Automated Decision Making	You have the right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out. Sonaca NA does not currently engage in any automated decision-making practices.

To Opt Out of Sales or Sharing of Personal Information	We do not or share your Personal Information. However, if we did, you would have the right to opt out of the sale or sharing of your Personal Information.
Limit Use of Sensitive Personal Information	You have the right to limit the use of your sensitive Personal Information (e.g. Social Security number and driver's license information) to only that which is necessary for providing our Services.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request related to your Personal Information.

You may only make a request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

To submit a request, please email us at LMIinfo@sonaca-na.com.

Verification: We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor's identity. If you are an authorized agent making a request on behalf of a California consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We will deliver our written response electronically via e-mail.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes.

Changes to this Notice

We may change this Notice from time to time, and we will post any changes on this page. Each version of this Notice is identified at the top of the page by its Effective Date.

Contact Us

For any questions or concerns, please contact us at LMIinfo@sonaca-na.com.