

# **Applicant and Employment Privacy Notice**

Last Updated: October 2023

This Applicant and Employment Privacy Notice (the "Employee Privacy Notice") explains the types of employee data that Richardson Electronics, Ltd. ("Richardson Electronics, Ltd.," "we," "us," and "our") may collect about an applicant or employee ("You"), when you search or apply for a job opportunity through our website or by email. It also describes the reasons we collect the information.

If you are a California resident, this Employee Privacy Notice also provides you with information about how to exercise your rights under the California Privacy Rights Act (the "CPRA").

- Information We Collect
- The Reasons Why We Collect the Information
- California Residents: Exercising Your Rights Regarding the Information
- Maintained Security
- Updates to this Policy
- Contact Us

#### **Information We Collect**

When we use the term "personal information," we mean information that identifies, relates to, describes, references, is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, with a particular person or household. We collect various types of personal information in the recruiting and application process and, if you are hired, for purposes of your employment.

We may collect personal information that falls into the following categories:

- **Identifiers**: real name, alias, postal (home/mailing) address, telephone number, email address, and relevant licenses and certifications
- **Personal Information**: signature, Social Security number, driver's license or state identification card number, passport number, bank account number, health insurance information
- Protected Classification Characteristics: sex, age, race, sexual orientation, disability, religion, veteran or military status, national origin, citizenship, federal work status, and marital status, together with associated information to understand and assess accommodation requests regarding potential disabilities or other health conditions. If required by the Department of Insurance, we may also collect background check information if necessary to complete a background check, when permitted by law
- Professional or Employment-Related Information: current or past job history, as reflected in your application and/or resume, performance evaluations, references, employment history, skills, communications, wage and salary data, and eligibility for employment may be reviewed during your background check

- Education-Related Information: education records directly related to a student maintained by an educational institution or party acting on its behalf may be reviewed during your background check
- Data Through Online or Website Interaction: if you browse Richardson Electronics, Ltd. Careers page we may collect anonymized analytics and/or Cookies. Please see our <u>Privacy Policy</u> and Notice for more information
- Data Through In-Person Interaction: When you are on Richardson Electronics, Ltd. property for an in-person interview or using Richardson Electronics, Ltd. equipment: name and photo identification (if you register at security), together with the date and time of arrival and departure, security footage that captures images, mobile device information (if you are using our guest or Richardson Electronics, Ltd. WiFi) such as browsing history and device ID.

We partner with a third-party service provider, Microsoft, for the collection and storage of this information. Our contract with Microsoft specifies that Your personal information is disclosed only for the limited and specified purposes enumerated herein; requires Microsoft to comply with its obligations under CPRA; provide the same level of privacy protection as is required under CPRA; allows us to take reasonable and appropriate steps to ensure Microsoft uses the personal information in a manner that is consistent with its obligations under CPRA; notify us if Microsoft determines it can no longer meet its obligations under the CPRA; and allows us, with reasonable notice, to take reasonable and appropriate steps to stop and remediate unauthorized use of personal information.

### The Reasons Why We Collect the Information

Richardson Electronics, Ltd. uses your personal information as permitted by law and for the following business purposes:

- Operational purposes including recruiting and employment related decisions, accommodating disabilities or health conditions, business planning, audit, compliance, and management of claims or legal disputes
- Safety and security purposes including safeguarding the interests of Richardson Electronics, Ltd. and protecting Richardson Electronics, Ltd.'s know-how, intellectual property, and trade and business secrets, and ensuring the functioning, efficiency, and integrity of our IT systems

# California Residents: Exercising Your Rights Regarding the Information

The CPRA allows our California employees the right to ask Richardson Electronics, Ltd. about the personal information that we have collected over the past twelve (12) months. This right may be in addition to or coincide with other rights you have under Cal. Labor Code §§ 226, 432 or 1198.5. Instructions on how You, as a California employee, can submit a verifiable request for access to this information (referred to as a "**Request to Know**") are below.

# **Right to Request Deletion of Your Data**

California employees have the right to request that we delete the personal information that we have collected from you ("Requests to Delete"). Upon Richardson Electronics, Ltd.'s receipt of a verifiable request to delete personal information (see below), we shall delete the personal information from our records and will direct our service providers to delete your personal information from their records.

However, **please note** that Richardson Electronics, Ltd. may deny your Request to Delete and need not comply with such a request (and need not ask third-party service providers to comply)

if retaining the information is necessary to comply with our legal obligations, such as our federal, state, and local retention requirements under the Americans with Disabilities Act, Family Medical Leave Act, Age Discrimination in Employment Act, and the Fair Labor Standards Act.

### **Right to Correct Inaccurate Personal Information**

California employees have the right to request that we correct inaccurate personal information that we maintain about them (the "**Right to Correct**"). Richardson Electronics, Ltd. will use commercially reasonable efforts in order to comply with California employee requests to correct inaccurate personal information.

# **How to Exercise Your Access, Deletion and Correction Rights**

You may make a verifiable request to exercise your Request to Know twice within a 12-month period. To exercise these rights, described above, please submit a verifiable request to us by either:

- Calling us at 1-800-235-2119
- Emailing privacy@rell.com

If you are a current employee of Richardson Electronics, Ltd. you may be able to access, delete, or correct your personal information by accessing your ADP profile, or emailing your HR representative.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to the personal information about you. If the request is made through an agent, we reserve the right to require a signed authorization or verification of the agent's identify from you in order protect the privacy of the personal information requested. You may also make a verifiable consumer request on behalf of your minor child.

We cannot provide you with the information sought in a Request to Know, or comply with a Request to Delete or Correct, if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. A verifiable 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.

We reserve the right to require additional information from you to verify your request before we respond. Any information provided to us in a verifiable customer request will be used only to verify the requestor's identity or authority to make the request.

### **Response Timing and Format**

We will acknowledge your request or exercise of the foregoing Rights within ten (10) days of receipt with information regarding how we will process your request. We will endeavor to

respond to a verifiable request within forty-five (45) days of receipt. If we require more time to provide a response, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period preceding receipt of your verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. 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.

You can review and change some of your personal information <u>by logging in to your ADP profile</u> (you will be redirected to a secure login page) and updating your information. We encourage you to promptly update your personal information if you discover it is inaccurate or if it changes (for example, if you move).

# **Maintained Security**

We realize that you trust us to protect your personal information. We take that trust seriously and maintain physical, electronic and procedural safeguards that are consistent with industry standards to help protect the privacy, accuracy, and reliability of personal information and to protect it from loss, misuse, unauthorized access, disclosure, acquisition, exfiltration, alteration and destruction.

To prevent unauthorized access, maintain data security, and ensure the correct use of information, we put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect.

If you have reason to believe that your personal information is no longer secure (for example, if you feel that your password has been compromised), please immediately notify us by sending an email to <a href="mailto:privacy@rell.com">privacy@rell.com</a>.

### **Updates to this Policy**

Richardson Electronics, Ltd. may modify this Employee Privacy Notice from time to time. The most current version will govern our use of your information and is effective as of the date it is posted or provided to you. You may contact us to obtain prior versions. We will notify you of material changes to this policy by posting a notice at the Website or by emailing you at an email address associated with your Website Account, if applicable.

### **Contact Us**

Richardson Electronics, Ltd. is located at 40W267 Keslinger Road, P.O. Box 393, LaFox, IL 60147-0393, United States of America. Should you have any comments or questions about how we collect and use your personal information, communication can be directed to Richardson Electronics, Ltd.'s postal address, via email to <a href="mailto:privacy@rell.com">privacy@rell.com</a> or by telephone to 1-800-235-2119.