



InfraServices Group Resources Employee Privacy Notice

Last updated May 7, 2025

This Employee Privacy Notice (“**Privacy Notice**”) describes the collection, use, and sharing of your personal information through the course of your employment with InfraServices Group Resources LLC (“**we**,” “**us**,” or “**our**”) and its subsidiaries and affiliates.

I. APPLICABILITY

This Privacy Notice applies to personal information collected from the personnel of InfraServices Group. The term “**personnel**” includes current employees and those that work on a non-permanent basis, such as temporary workers that are assigned to us through a temporary staffing agency.

PERSONAL INFORMATION WE COLLECT, WHY AND FOR HOW LONG

During the course of your employment with InfraServices Group, we collect personal information about you, as well as personal information related to your spouse, dependent(s), or family member(s) (collectively, “**Dependents**”), where there is a legitimate reason to do so in connection with our relationship with you. To the extent we collect personal information on your Dependents, you should inform your Dependents that you are providing this information to us and why, and make sure that it is acceptable to them.

Through your employment with InfraServices Group, we will collect personal information to:

- **Administer salary and benefits:** We collect from you as well as from governmental entities and benefit providers, your *identifiers* (name, telephone number, physical address, email address (if provided), date of birth, employment identification number, your *sensitive identifiers* (social security number, driver’s license number, state identification number, and passport (if provided)), your *protected classifications* (marital status, age, gender, disability status (if provided), veteran status (if provided), and *financial information* (bank account and routing number). Social security number, driver’s license number, state identification number and passport are considered sensitive under the California Privacy Rights Act (“CPRA”). We use this information to administer salary and benefits, such as medical, dental, and retirement benefits. We also collect from you the *identifiers* (name and date of birth) and *sensitive identifiers* (social security number) of Dependents. We use the Dependent information to process their eligibility as your Dependents for the purpose of benefits. We retain this information for six years after termination.
- **Administer reimbursements:** We collect, from you, and from our vendors, your *identifiers* (name, physical address), *financial information* (bank account and routing number), *corporate financial information* (InfraServices Group-issued credit card), purchases through InfraServices Group’s travel service, and details of travel or expenses incurred in connection with your employment. We use this information to issue reimbursements. We retain this information for four years after termination.
- **Career Development:** We collect, from you, your *identifiers* (name) and *professional information* (licenses, credentials, employment history, educational history, resume/CV, disciplinary evaluations, performance reviews, terms and conditions of employment). We use this information to identify, deliver, and track training needs and outcomes, to help with career development, succession, planning, and workforce management and to manage professional requirements, certifications and memberships and to manage relationships with vendors. We retain this information for four years after termination.
- **Conduct IT security and management:** We collect, automatically via Microsoft Windows’ natural function and login and includes our end point security tool when you use InfraServices Group systems, *electronic network activity information* (username, password, IP address, browsing history, search history, websites visited, interactions with websites). We collect *geolocation information* (geolocation data

of the IP from workstations, and mobile data) and your business email address. We use this information to ensure compliance with InfraServices Group's policies and procedures, to protect data assets of InfraServices Group, for authentication purposes, and to provide IT support. We retain this information for four years after termination.

- **Conduct performance reviews:** We collect, from you, your *identifiers* (name) and *professional information* (licenses, credentials, employment history, educational history, resume/CV). We use this to conduct performance reviews and evaluate personnel for internal opportunities. We retain this information for four years after termination.
- **Conduct background checks:** We collect from you, your *identifiers* (name, date of birth, address) and *sensitive identifiers* (social security number). Social security numbers are considered sensitive under the CPRA. We use this information to conduct background checks for employment purposes. We retain this information for four years after termination.
- **Create a personnel file:** We collect, from you, your *identifiers* (name, date of birth, telephone number, physical address) and *professional information* (licenses, credentials, employment history, educational history, resume/CV, disciplinary evaluations, performance reviews, terms and conditions of employment, salary (including retirement accounts, pensions, or insurance coverage), skills, qualifications, experience, travel history, professional/occupational memberships, and time-off work). We use this personal information to maintain your personnel file, create personnel biographies, and for internal recruitment purposes (assessing your eligibility for other positions within InfraServices Group). We retain this information for four years after termination.
- **Perform general human resources functions:** We collect, from you, your *identifiers* (name, personnel ID, email address, telephone number, physical address) and emergency contact information. We use this information to perform general human resources functions, such as personnel support, termination, and emergency contact procedures. We retain this information for four years after termination.
- **Facilitate employee engagement:** We collect, from you, educational information, performance assessments, reviews, appraisals, and ratings. We use this information to evaluate employee engagement or assist in matching employees with appropriate roles. We collect, from you, photographs with your permission. We add these photographs to the InfraServices Group intranet, to facilitate employee engagement and interaction. We retain this information for four years after termination.
- **Issue tax forms:** We collect, from you, your *identifiers* (name, physical address), your *sensitive identifiers* (social security number) and your *tax information* (withholding details). Social security numbers are considered sensitive under the CPRA. We use this information to issue tax forms and comply with tax reporting requirements. We retain this information for six years following the end of employment.
- **Evaluate need for reasonable accommodations:** We collect, from you, your *identifiers* (name, email address, telephone number, physical address), your *medical information* (doctor's notes, requests for accommodations) and your *protected classifications* (any disabilities you may have). We use this information to evaluate, upon request, the need for reasonable accommodation. We retain this information for four years after termination.
- **Monitor compliance with equal opportunities and anti-discrimination laws:** We collect, from you, as well as from benefit providers, governmental entities, and background check providers, your *protected classifications* (race, national origin, citizenship, sex, date of birth, military or veteran status, any disabilities you may have). We use this information to comply with our obligations under these laws, equal opportunities and anti-discrimination laws. We retain this information for four years after termination.

- **Monitor work-related licenses and credentials:** We collect, from you, as well as from educational institutions, personal and professional references your *identifiers* (name) and your *professional information* (licenses, credentials, employment history, educational history, resume/CV). We use this information to manage work-related licenses and credentials. We retain this information for four years after termination.
- **Promote safety and security:** We collect from you, your photograph and images to create security badges to promote the safety and security of InfraServices Group employees, contractors, visitors, customers, and consumers. We retain this information for four years after termination.
- **Verify your education:** We collect, from you, as well as from background check providers, and education institutions, your *non-public education information* (verification of education level completed, verification of dates enrolled in educational institutions). We use this information to verify your education for employment purposes. We retain this information for four years after termination.
- **Review drug test results:** When a drug test is requested, we collect the results of the drug test from the drug test provider. We collect this information to determine whether you are taking and/or under the influence any prohibited substance(s). If the drug test results identify a substance in your body that may be the subject of a valid medical prescription, then we may collect additional relevant medical information from you as necessary to confirm whether you are legally permitted to consume the relevant substance. We retain this information for four years after termination.

InfraServices Group will also use the personal information we collect as described in this section to comply with the law, to efficiently maintain our business, and for other limited circumstances as described in **HOW WE SHARE YOUR PERSONAL INFORMATION**.

We process your personal information for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence or when storage is a technical requirement as set forth in our records retention policy. If there are no contrary legal or contractual obligations, we will delete or anonymize your data once the storage or processing period has expired as part of our usual processes. We may need to use and retain your personal information for longer than these reasons for purposes of:

- Compliance with our legal obligations. For example, retaining your employee records the purpose of accounting, dispute resolution and compliance with labor, tax and other financial regulations.
- Meeting our safety and security commitments. Such as keeping our properties secure and preventing fraud.
- Exercising or defending legal claims. We also may need to retain information for longer than the terms in order to meet with legal process or enforceable governmental request, or to enforce our employment agreements including investigation of potential violations.

II. HOW WE SHARE YOUR PERSONAL INFORMATION

General Sharing

We share your personal information as follows:



Within InfraServices Group: We share your personal information within InfraServices Group to receive information technology (“IT”) services/security, human resources, tax and accounting, and general business and employment management services. Access to personal information is limited to those on a need-to-know basis.

With Service Providers: We share your personal information with our service providers to assist us in managing and administrating your employment. These service providers include IT support, health insurance, payroll, expense processing, benefits plans, and professional advisors (accountants, legal).

With Third Parties: We share your personal information with third parties, such as legal advisors, law enforcement agencies, or governmental/regulatory bodies in order to protect our legal interests and other rights, protect against fraud or other illegal activities, for risk management purposes, and to comply with our legal obligations.

During a Corporate Reorganization: In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we will share personnel personal information.

Legal Purposes: We share personal information where we are legally required to do so, such as response to court orders, law enforcement, or legal process including for national security purposes; to establish, protect, or exercise our legal rights, as required to enforce our agreements or other contracts; to defend against legal claims or demands; or to comply with the requirements of any applicable law.

Sharing in the Preceding Twelve (12) Months

For Business Purposes: In the preceding twelve (12) months, InfraServices Group has disclosed the following categories of personal information for a business purpose to the following categories of third parties:

- We have disclosed your personal identifiers, protected classifications, professional or employment related information, internet or other electronic network information, and your customer records information to service providers that help us perform employment-related functions. These service providers include IT support, background check companies, payroll processors, expense processors, health insurance providers, and benefits providers.
- We have disclosed your personal identifiers and internet or other electronic network information to IT support to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to identify and repair errors that impair functionality.
- We have disclosed your personal identifiers and internet or other electronic network activity information to IT support to help us maintain the quality and safety of InfraServices Group devices or to improve, upgrade, or enhance InfraServices Group devices.

For Sale: InfraServices Group does not sell personnel personal information.

III. RIGHTS OF CALIFORNIA EMPLOYEES

The California Privacy Rights Act (“CPRA”) grants certain rights to California residents. If our processing of your personal information is subject to the CPRA, you are entitled to the following rights:

- **Right to know/access:** You have the right to request what personal information we have collected, used, disclosed, and sold about you. Below, there are details on how to exercise this right. You may only make a request for access twice within a 12-month period.

- **Right to deletion:** You have the right to request the deletion of your personal information that we collect or maintain, subject to certain exceptions. Those exceptions include and are not limited as necessary for the business to comply with legal obligations, exercise legal claims or rights, or defend legal claims.
- **Right to opt-out of Sale/Sharing:** We do not sell personnel personal information or share this information with third parties for targeted advertising purposes.
- **Right to non-discrimination:** You have the right to not receive discriminatory treatment if and when you exercise your rights to access, delete, or opt-out under the CPRA.
- **Right to correct:** You have the right to correct inaccurate personal information that we collect or maintain. If we believe the information in question is correct, we will ask you to provide documentation if necessary to rebut our own documentation that the personal information is accurate.
- **Right to limit use of sensitive personal information:** You have the right to limit the use of how we use your sensitive personal information. Sensitive information includes social security number, driver's license number, biometric information, precise geolocation, and racial and ethnic origin. However, InfraServices Group does not process sensitive personal information in a manner which gives rise to this right.

To exercise your right to access or delete your personal information, you may submit a request using our CPRA request form at www.qualtekservices.com/Contact/, contact us toll-free at (866)960-9066, or by email at hr@qualtekservices.com. For requests submitted via inquiry, telephone, or email, you must provide us with your first and last name, dates of employment and a phone number to reach you at for verification that allows us to reasonably verify you are the person about whom we collected the personal information and describe your request with sufficient detail to allow us to properly evaluate and respond to it. If we are not able to verify your identity for access and deletion requests with the information provided, we may ask you for additional pieces of information. 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. If you are an authorized agent making a request on behalf of another individual, you must provide us with signed documentation that you are authorized to act on behalf of that individual. Authorized agents should submit a request along with individual's signed authorization to request on their behalf via webform as indicated above or email to hr@qualtekservices.com.

SECURITY

We implement and maintain reasonable security measures to protect the personal information we collect and maintain. These security measures include encryption, access controls, and employee training. However, no security measure or modality of data transmission over the Internet is 100% secure and we are unable to guarantee the absolute security of the personal information we have collected from you.

IV. CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice is subject to change at any time at the sole discretion of InfraServices Group. Changes to this Privacy Notice will be communicated to employees and will indicate the date the changes go into effect. If we make any changes that materially affect your privacy rights, we will announce those changes by email, and obtain your consent, if required.

V. CONTACT US

For questions about this Privacy Notice or the protection of your personal information and privacy rights, please contact the InfraServices Group CPRA Hotline at (866)960-9066. You may also submit requests by



emailing us at hr@infraservices.com or by mail at InfraServices Group Resources, 1787 Sentry Parkway West, VEVA 18 – Suite 100 Blue Bell, PA 19422.