

Sofidel America Corp.

Privacy Policy for the Processing of Personal Data of Employees

Last Update: June 27, 2026

Sofidel America Corp. (“Sofidel”, “company”, “we”, or “us”) is committed to protecting the privacy and security of your personal information. This Privacy Policy (“Privacy Policy”) applies solely to employees (collectively, “Employees”) who work at Sofidel and reside in the United States. Accordingly, we inform you that the personal information collected for the purposes of managing your work relationship with Sofidel will be processed by Sofidel in accordance with applicable laws and internal procedures. Please be aware that this Privacy Policy applies depending on the context of your relationship with Sofidel and underlying laws. We invite you to read this Privacy Policy together with other applicable privacy notices.

1. INFORMATION WE COLLECT

For purposes of this Privacy Policy, “personal information” means any information about an identifiable individual or otherwise as defined in accordance with applicable privacy law. Personal information excludes anonymous or de-identified data that is not associated with a particular individual.

A. Personal Information You Provide to Us

We may collect the following categories of personal information from you in connection with the work you perform for Sofidel: personal information (name, surname, date of birth, address, image, gender, marital status, tax code, employee identification numbers, username, etc.); company and private contact information; data contained in company tools assigned to staff (e.g. internal directories, laptops, logs, etc.); curriculum vitae data; professional and work, accounting, remuneration, social security, tax, welfare, fiscal and judicial data. In addition, in the fulfilment of specific obligations relating to the management of the work relationship whether it be company or third party vendors/suppliers (such as accounting, account balances, remuneration, and social security, welfare and tax obligations as appropriate and in accordance with applicable law), as well as in the event of communications from the worker, it may happen that the company processes sensitive data that reveal the worker’s racial and ethnic origin, religious beliefs, political opinions, membership of political parties, trade unions, associations or organisations of a religious or philosophical nature, as well as the worker’s health (e.g. illness and accident certificates, pregnancy certificates, trade union proxies, membership of so-called protected categories, participation in Employees’ representative bodies, results of medical examinations carried out in accordance with the law and contract, public offices, etc.).

B. Personal Information We Collect from Third Parties

We may receive certain information about you from third parties in connection with your work at Sofidel. Information we collect from them may include the types of information listed in Section 1.A, above.

C. Non-Personal Information

Sofidel may collect, use, and share de-identified, anonymized, and/or aggregated information, which is not considered personal information. De-identified, anonymized, or aggregated data may

be derived from your personal information, but is not considered personal information, since it does not directly or indirectly reveal your identity. To the extent that Sofidel collects consumer information that is in de-identified form, we will maintain and use the information in de-identified form and not attempt to re-identify the information.

2. COLLECTION AND USE OF PERSONAL INFORMATION

Most of your personal data comes from you. We will collect, use, and process your personal information for legitimate business purposes including the establishing, maintaining, or terminating your employment relationship with Sofidel.

3. DATA SHARING

We may share your personal information with the following parties:

Internal Parties

- With any entity being part of the “Sofidel Group”.

External Parties

- Vendors, service providers, and contractors we may use to assist (if any) in providing services to us or assist us in our daily operations and management of Sofidel Employees.
- Professional advisers, such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial, auditing, and accounting services to us so we can operate our business.
- Law enforcement agencies, courts, supervisory authorities, regulatory bodies and certain other third parties, to the extent that we are permitted or required to do so by applicable law, or in order to comply with our legal and regulatory obligations, or in the interests of national security, or to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity.
- To protect the rights, property, or safety of Sofidel, our services, Employees or others; to investigate, prevent, or take action regarding suspected or actual illegal activities; or to otherwise exercise or defend legal claims or comply with our legal obligations.
- To other third parties with your authorization or upon your direction.
- To other third parties, in connection with a change of corporate control or other investment in Sofidel, such as a restructuring, merger, transfer, or sale of some or all of our assets.

4. DATA TRANSFER AND STORAGE

The information that you provide will remain in the U.S. and/or transferred to another country where our parent company is located or where we have engaged service providers.

As a result, your personal information may be subject to data protection and other laws that may differ from your country of residence. Your personal information may be disclosed in response to inquiries or requests from governmental or regulatory authorities in the countries in which we and/or our service providers operate.

5. DATA SECURITY

We have implemented appropriate security measures designed to secure your personal information against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit

access to personal information to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

However, no transmission of information via the Internet or wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that there are security and privacy limitations of the Internet which are beyond our control and accordingly, the security, integrity and privacy of data exchanged between you and us cannot be guaranteed.

We will notify you and any applicable regulator of any personal information breach where we are legally required to do so.

6. DATA RETENTION

Sofidel also will retain your personal information to (i) comply with legal obligations under applicable law; (ii) use the data in furtherance of fraud prevention, security, or to otherwise help ensure the integrity of our company and services; or (iii) use the data in furtherance of establishing or defending a legal, regulatory, or law enforcement claim or investigation; and/or for any other permitted purpose under applicable privacy law.

7. ADDITIONAL INFORMATION FOR EMPLOYEES THAT ARE CALIFORNIA RESIDENTS

We are providing this additional information to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). This section applies solely to Employees who reside in the State of California. Any terms defined in the CCPA have the same meaning when used in this section of the Privacy Policy.

A. Categories of Personal Information We Collect

During your work at Sofidel, we collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. **Table 1** below identifies the categories of personal information that Sofidel may have collected from you at Sofidel in the preceding twelve (12) months:

Table 1 - Personal Information Categories

CATEGORIES OF PERSONAL INFORMATION	EXAMPLES OF SPECIFIC PERSONAL INFORMATION WE MAY COLLECT
A. Identifiers	A real name (including name pronunciation), alias, nickname, signature, postal address, country of residence, email address, telephone number, date of birth, Social Security Number (SSN), driver’s license number or other government identification, passport number, username, social media profile, social media URL address, account name, unique personal

Table 1 - Personal Information Categories

CATEGORIES OF PERSONAL INFORMATION	EXAMPLES OF SPECIFIC PIECES OF PERSONAL INFORMATION WE MAY COLLECT
	identifiers, online identifier, Internet Protocol (IP) address, device IDs, and other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, signature, SSN, address, telephone number, physical characteristics or description, passport number, driver's license or state identification card number, education, employment, and work history. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law	Protected classification characteristics include your age, race, skin color, ancestry, ethnicity/national origin, citizenship, religion (includes religious dress and grooming practices), marital status, disability (including mental and physical), sex/gender (includes pregnancy, childbirth, breastfeeding and/or related medical conditions), gender identity (including personal pronouns), gender expression, sexual orientation, marital status, and veteran or military status.
D. Commercial information	None
E. Biometric information	Fingerprints (for employees utilizing time clocks).
F. Internet or other similar network activity	Login data and information relating to your interaction with our website or mobile application (if you submit your application via our website or mobile app); the contents of and information contained in emails or other communications that you send to us.
G. Geolocation data	Time zone setting and location.
H. Audio, electronic, visual, thermal, olfactory, or similar information	Imagery of your face and voice recordings

Table 1 - Personal Information Categories

CATEGORIES OF PERSONAL INFORMATION	EXAMPLES OF SPECIFIC PIECES OF PERSONAL INFORMATION WE MAY COLLECT
I. Professional or work-related information	Professional or work-related data.
J. Non-public education information, per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Information about your educational background, such as education records, report cards, and transcripts that are not publicly available.
K. Inferences drawn from other personal information to create a profile	Profile reflecting your character, characteristics, reputation, preferences, predispositions, behavior, attitudes, or abilities.
L. Sensitive Personal Information	<i>Nationality, Citizenship, and Government Identifiers</i> – Country of birth, government identification documents (including passports and residency permits), and SSN (or equivalent). <i>Demographic Information</i> – Protected classifications under U.S. or California Law such as, race, ethnicity, union membership, sex life or sexual orientation, religious or philosophical beliefs, disability, or accommodation request. Some personal information included in this category may overlap with other categories.

Sofidel will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes, without providing appropriate notice to you.

B. Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from you.** For example, when you submit your application and resume/CV, or correspond with us by post, phone, e-mail or otherwise.
- **Indirectly from you.** For example, through automated technologies or your interactions with us.

- **Third Parties.** We may receive personal information about you from various third parties, such as references, background check providers, service providers, or other third parties that you direct to disclose information to us.

C. Purposes for Collecting and Using Your Personal Information

We collect, use, and process your personal information for various business purposes as your employer.

In addition to the reasons listed above, Sofidel may collect and use your sensitive personal information only as an employer (or business as the case may be) and/or as necessary to perform services or provide goods reasonably expected by an average consumer, or as otherwise permitted by the CCPA. Specifically, Sofidel collects or uses your sensitive personal information for the following business purposes:

- Monitoring equal employment opportunities.
- Conducting background verification processes (to the extent permitted by applicable laws).

D. Disclosures of Your Personal Information

Table 2 below identifies the categories of personal information disclosed to third parties, service providers, or others for a business purpose in the preceding twelve (12) months:

Table 2 - Disclosures to Third Parties for a Business Purpose

CATEGORY OF PERSONAL INFORMATION DISCLOSED FOR A BUSINESS PURPOSE	CATEGORIES OF THIRD PARTIES
A. Identifiers	• Companies within our corporate family that comprise the “Sofidel Group” • Vendors, and service providers, and contractors • Background check providers • Professional advisors
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors

Table 2 - Disclosures to Third Parties for a Business Purpose

CATEGORY OF PERSONAL INFORMATION DISCLOSED FOR A BUSINESS PURPOSE	CATEGORIES OF THIRD PARTIES
	• Background check providers • Professional advisors
C. Protected classification characteristics under California or federal law	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors • Professional advisors
D. Commercial information	N/A
E. Biometric information	• Companies within our corporate family that comprise the Sofidel Group • Vendors for time and attendance purposes
F. Internet or other similar network activity	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors • Professional advisors
G. Geolocation data	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors • Professional advisors

Table 2 - Disclosures to Third Parties for a Business Purpose

CATEGORY OF PERSONAL INFORMATION DISCLOSED FOR A BUSINESS PURPOSE	CATEGORIES OF THIRD PARTIES
H. Audio, electronic, visual, thermal, olfactory, or similar information	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors • Professional advisors
I. Professional or work related information	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors • Professional advisors
J. Non-public education information, per the Family Educational Rights and Privacy Act	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors • Professional advisors
K. Inferences drawn from other personal information to create a profile	• Companies within our corporate family that comprise the Sofidel Group • Vendors, and service providers, and contractors • Professional advisors
L. Sensitive Personal Information	• Companies within our corporate family that comprise the Sofidel Group

Table 2 - Disclosures to Third Parties for a Business Purpose

CATEGORY OF PERSONAL INFORMATION DISCLOSED FOR A BUSINESS PURPOSE	CATEGORIES OF THIRD PARTIES
	• Vendors, and service providers, and contractors • Professional advisors

In addition, Sofidel may disclose any or all of the personal information identified in the categories above to the following categories of third parties for a business purpose, depending on how you interact with our services and/or where Sofidel has an obligation to make such disclosure:

- Government entities, where required by law or in order to comply with our legal or regulatory obligations.
- Other third parties, where required by law or in order to protect our rights, or the rights of our customers or others.
- Third parties, in connection with a change of corporate control or other investment in Sofidel.
- Third parties, where you have expressly consented to the disclosure your personal information.

Sofidel does not “sell” or “share” your personal information (including sensitive personal information) as each term is defined under the CCPA, and it does not have actual knowledge that it sells or shares personal information of consumers under 16 years of age. Sofidel does not use or disclose your sensitive personal information, except as necessary to evaluate your performance or as otherwise detailed in this Privacy Policy.

E. Your Rights Under the CCPA

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how you can exercise them. These rights are not absolute, and in certain cases, we may decline your request as permitted by law.

If you are a California resident, and the CCPA does not recognize an exception that applies to you, your personal information or our processing of your personal information, you will have the rights identified in **Table 3** below.

Table 3 - California Consumer Rights

Right to Know/Access	The right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial
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	purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
Right to Limit	You can direct Sofidel to only use your sensitive personal information (for example, your social security number, financial account information, precise geolocation data, or genetic data) for limited purposes, such as providing you with the services you requested.
Right to Delete	The right to request that Sofidel delete your personal information that we have collected from you.
Right to Opt Out	You may request that Sofidel stop selling or sharing (for cross-context behavioral advertising) your personal information (“opt-out”), including through a user-enabled opt-out preference signal. Sofidel cannot sell or share your personal information after they receive your request to opt-out of sale/sharing unless you later consent to the sale or sharing of your personal information. Notwithstanding the disclosure of this right, Sofidel, as stated before, does not share or sell your personal information.
Right to Correct	The right to request that Sofidel correct any inaccurate personal information that it maintains about you.
Right of No Retaliation	The right not to be discriminated against because you exercised any of your CCPA rights.

To exercise a CCPA consumer right as described above, you can submit a verifiable consumer request to us by emailing privacy.us@sofidel.com.

Making a Verifiable Consumer Request:

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

Using an Authorized Agent: If you use an authorized agent to submit a consumer request, the authorized agent must provide documentation or other proof indicating that they are authorized to act on your behalf. For requests to correct, access or delete personal information, we may require you to verify your identity directly with us (for example, by emailing us directly from your email address associated with your application), and directly confirm with us that you provided the authorized agent permission to submit the request. If you are an authorized agent, you may make a request by emailing privacy.us@sofidel.com and providing documentation or other proof

indicating that you are authorized by the consumer to act on their behalf. The authorized agent must provide documentation necessary (as determined in Sofidel's discretion) to verify the agent has authority to act on the consumer's behalf in relation to CCPA requests.

Limitations on CCPA Requests: You may only make a verifiable consumer request to know or for access twice within a 12-month period. The verifiable consumer 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; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Response Timing and Format: We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing (email suffices). The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data access requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance, for example, through an Excel file format.

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

F. Your Rights Under Illinois Statute 740 ILCS 14/15 (2026)

Sofidel may keep biometric identifiers and information of its employees until such time as either (i) the initial purpose for collecting or obtaining such identifiers or information has been satisfied, or (ii) up to three (3) years from the employee's last interaction with the company, whichever occurs first. Accordingly, Sofidel will destroy or request that any timekeeping vendor and/or corporate member of the Sofidel Group (as applicable) destroy or delete such biometric information at that time. Biometric data can also be deleted by Sofidel's timekeeping vendor upon request by the employee.

Sofidel in no way profits from, sells, leases, or trades any person's biometric data. Biometric data is taken in the form of a fingerprint that is then converted into an alphanumeric sequence which is personalized to that fingerprint.

The purpose of taking and keeping biometric data as described above is so employees may have a personal identifier for "clocking in" on the company's timeclocks at the beginning of their shift, and then "clocking out" upon their shift's conclusion.

8. CONTACT FOR PRIVACY-RELATED QUESTIONS

If you have any questions about this Privacy Policy, how we handle your personal information, or to exercise a consumer right, please contact us at the below:

- Email: privacy.us@sofidel.com

- Mailing Address: 300 Welsh Road, Building #1, Horsham, PA 19044, Attn. Legal Office

9. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify or update this Privacy Policy at any time. We will post a copy of any updated Privacy Policy on our website or portals when we make any updates and/or provide appropriate notice to you.