

**PRIVACY NOTICE TO CONSUMERS IN B-2-B CONTEXT**

OEC Group and/or any affiliated entities (collectively, the “**Company**” or “**we**”) provide this Privacy Notice (“**Notice**”) to describe our privacy practices with respect to our collection of Personal Information. This Notice applies to individuals (natural persons) meeting two criteria: (1) you acted or are acting as an employee, owner, director, officer, or independent contractor of a company, partnership, sole proprietorship, non-profit, or government agency; and (2) your communications or transactions with us occur solely within the context of the Company conducting due diligence regarding, or providing or receiving a product or service to or from, the entity on whose behalf you act or are acting in your interaction with us. In this Notice, we disclose to you what “**Personal Information**” we collect from or about you in the course of your business-type interaction with the Company.

**1. Information We Collect From or About You**

We may collect Personal Information from or about you in a variety of different situations and using a variety of different methods depending on the manner in which you interact and communicate with us and our employees, including, but not limited to, when you interact with or access our website, when you use your mobile device to access or connect to any of our systems or networks, when you send us emails or we receive emails about you, when you access or visit our physical locations, through written materials, through the mail, and/or over the telephone. Generally, at various times in the course of your interaction with the Company in your capacity as an employee, owner, director, officer, or independent contractor of any company, partnership, sole proprietorship, non-profit, or government agency with which we have business dealings and transactions, we may collect, receive, maintain, and use the following categories of Personal Information for any of the purposes listed below in this Notice and to the extent permitted under applicable law:

<b>CATEGORY</b>	<b>EXAMPLES</b>	<b>Retention Period</b>
Personal Identifiers	Name, alias, social security number, driver’s license or state identification card number.	Date of last transaction plus 7 years, or (where contract exists), contract term plus 7 years, whichever is later
Contact Information	Home, postal or mailing address, email address, home phone number, cell phone number.	Date of last transaction plus 7 years, or (where contract exists), contract term plus 7 years, whichever is later
Account Information	Username and password for Company accounts and systems, and any required security or access code, password, security questions, or credentials allowing access to your Company accounts.	<u>Username</u> : permanent; <u>Password or security code</u> : while in use + 6 months
Professional Related Information	Information contained in tax forms/1099 forms, and information related to services provided to or rendered by the entity you represent in your dealings with the Company, including information in statements of work.	Date of last transaction plus 7 years, or (where contract exists), contract term plus 7 years, whichever is later

Financial Information	Information contained in invoices billed to the Company and in records of payments made by the Company, or other financial account information.	Date of last transaction plus 7 years, or (where contract exists), contract term plus 7 years, whichever is later
Pre-Contract Information	Information provided in a proposal for services, information gathered as part of vendor evaluation other assessments of vendor qualifications to provide services to the Company, information in work product samples provided, and voluntary disclosures provided to Company.	Date of last transaction plus 7 years, or (where contract exists), contract term plus 7 years, whichever is later
Internet, Network, and Computer Activity	Internet or other electronic network activity information related to your usage of Company networks, servers, intranet, or shared drives, including system and file access logs, security clearance level, browsing history, search history, and usage history.	3 years
Geolocation Data	IP address.	2 years
Online Portal and Mobile App Access and Usage Information	Security clearance level.	3 years
Visual, Audio or Video Recordings in the Workplace	Your image when recorded or captured in surveillance camera footage.	Surveillance video – 90 days

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information the Company may collect:

1. Personal Identifiers (social security number, driver’s license or state identification card number)
2. Account Information (your Company account log-in, in combination with any required security or access code, password, or credentials allowing access to the account)

Personal information *does not* include:

1. Publicly available information from government records.
2. Information that a business has a reasonable basis to believe is lawfully made available to the general public, whether by you or from widely distributed media.
3. Information made available by a person to whom you have disclosed the information if you have not restricted the information to a specific audience.
4. De-identified or aggregated information.

## 2. How We Use Personal Information and Sensitive Personal Information

The Personal Information and Sensitive Personal Information we collect, and our use of Personal Information and Sensitive Personal Information, may vary depending on the circumstances. This Notice is intended to provide an overall description of our collection and use of Personal Information and Sensitive Personal Information. Generally, we may use or disclose Personal Information and Sensitive Personal Information we collect from you or about you for one or more of the following purposes:

1. To fulfill or meet the purpose for which you provided the information.

2. To comply with local, state, and federal law and regulations requiring businesses to maintain certain records (such as accident or safety records, and tax records/1099 forms).
3. To engage the services of vendors, service providers, consultants, and independent contractors and compensate them for services.
4. To evaluate, make, and communicate decisions regarding transactions with the entity you represent or work for, including decisions to enter into, renew, and/or terminate a contract.
5. To grant you access to secure Company facilities, systems, networks, computers, and equipment, and maintain information on who accessed such facilities, systems, networks, computers, and equipment, and what they did therein or thereon.
6. To engage in lawful monitoring of your activities and communications when you are on Company premises, or utilizing Company internet and WiFi connections, networks, software applications or systems.
7. To implement, monitor, and manage electronic security measures on devices that are used to access Company networks and systems.
8. To engage in corporate transactions requiring review of the relationships and contracts between the Company and the entity you represent or work for, such as for evaluating potential mergers and acquisitions of the Company.
9. To maintain commercial insurance policies and coverages.
10. To provide services to corporate/entity customers or clients who may request certain pieces of information about a Company vendor, service provider, consultant or independent contractor (such as name and phone number) to permit the individual access or security clearance to their facility in advance of the individual being dispatched to provide services at, deliver products to, or otherwise in engage in business meetings or other activities at the facility of the corporate/entity customer or client.
11. To evaluate, assess, and manage the Company's business relationship with vendors, service providers, and contractors that provide services to the Company.
12. To improve user experience on Company computers, networks, devices, software applications or systems, and to debug, identify, and repair errors that impair existing intended functionality of our systems.
13. To detect security incidents involving potentially unauthorized access to and/or disclosure of Personal Information or other confidential information, including proprietary or trade secret information and third-party information that the Company receives under conditions of confidentiality or subject to privacy rights.
14. To protect against malicious or illegal activity and prosecute those responsible.
15. To prevent identity theft.
16. To verify and respond to consumer requests under applicable consumer privacy laws.

### **3. Retention of Personal Information**

We will retain each category of personal information in accordance with our established data retention schedule as indicated above. In deciding how long to retain each category of personal information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information

was collected; relevant federal, state and local recordkeeping laws; applicable statutes of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

#### **4. Sale/Sharing of Information to Third Parties**

The Company does **not** and will not sell your Personal Information or Sensitive Personal Information for any monetary or other valuable consideration. The Company does **not** and will not share your Personal Information or Sensitive Personal Information for cross-context behavioral advertising.

#### **5. Access to Privacy Policy**

For more information, please review the Company's Privacy Policy at [https://www.oecgroup.com/privacy\\_policy](https://www.oecgroup.com/privacy_policy)

**By continuing use of OEC Group's services, I acknowledge and confirm that I have received and read and understand this disclosure. I hereby authorize and consent to the Company's use of the personal information it collects, receives or maintains for the business purposes identified above.**