

BERNARDON

A DIVISION OF CORE STATES GROUP

ARCHITECTURE

INTERIOR DESIGN

LANDSCAPE ARCHITECTURE

BERNARDON, LLC JOB APPLICANT PRIVACY NOTICE

Last Updated: June 2023

Bernardon, LLC (“Bernardon”) and its affiliates¹ appreciate the trust and respect the privacy of everyone who uses our applicant web portal. This Job Applicant Privacy Notice explains how Bernardon uses, stores, discloses, and protects the Personal Information that we collect when you interact with us through the applicant web portal and our follow-up communications, as well as your rights and choices regarding the information that we collect from you relating to potential employment with Bernardon.

Bernardon is a U.S.-based company. As a result, information that we collect from you on the applicant web portal including Personal Information, will be transferred to and accessed from our U.S. offices to permit us to perform employment-related activities and to comply with our legal, regulatory and policy obligations. In addition, we may work with third-party service providers in the U.S. and in other countries to support our employment-related activities. Thus, if you are not located in the United States, your information may be transferred to, stored on servers in, and accessed from the U.S. and from countries other than the country in which we initially collected the information from you. Those countries may have different legal protections from the country in which the information was collected. In all such instances, we use, transfer, and disclose Personal Information solely for the purposes described in this Privacy Notice.

1. Information We Collect. In connection with your interest in employment with Bernardon, we collect Personal Information about you through the applicant web portal and through our follow-up communications, including but not limited to telephone calls, email, and physical delivery. During the application and hiring process, we collect the following from you directly, your public social media pages, background checks you consent to, and any references you may provide:

¹ CoreStates, Inc., CoreStates Construction Services, Inc., and Bernardon, LLC.



Category of Personal Information	Examples	Categories of Third Parties to whom the information is disclosed for Operational Business Purposes
Personal Identifiers	Information such as your name; alias; username; email address; phone number; mailing address; IP-address; social security number; driver's license number; Employee ID; date of birth; bank account and other financial account numbers; and health insurance coverage information.	Affiliates; vendors.
Personal Characteristics	Information such as your age; race; sex; citizenship; marital status; medical condition; physical or mental disability; and pregnancy or childbirth and related medical conditions; disability; and military or veteran status.	Affiliates; vendors.
Education or employment information	Education records such as grades; transcripts; professional; or employment-related information included in locations such as a resume/CV, social media profiles, and job applications.	Affiliates; vendors; professional advisors, such as legal advisers, accountants, and financial advisers; legal authorities, government agencies and regulators.



Category of Personal Information	Examples	Categories of Third Parties to whom the information is disclosed for Operational Business Purposes
Information regarding your interaction with applicant web portal	Information including precise geolocation information, links you use or web pages you visit while visiting applicant web portal, browser type, internet service provider (ISP), cookies, and mobile device information including device identifier or other information.	Affiliates; vendors; professional advisors, such as legal advisors; legal authorities, government agencies, and regulators.

- 2. Why We Collect Your Personal Information.** We use the Personal Information that we collect from you via the applicant web portal and during our follow-up communications only to the extent necessary and for the limited purposes of:
- Assessing your application for employment;
 - Exercising Bernardon rights and fulfilling Bernardon’s obligations under employment, social security, and other applicable laws;
 - Protecting your vital interests;
 - Protecting the security of the applicant web portal and preventing fraud; and
 - Other uses for which Bernardon has obtained your advance, express written consent.
- 3. Access and Use of Your Personal Information.** We limit access to and use of your Personal Information to authorized Bernardon individuals who need it for employment-related purposes and for compliance with Bernardon’ legal, regulatory, and policy obligations.



- 4. Sharing and Disclosure of Your Personal Information.** We will only disclose your Personal Information to third parties that provide administrative and support services to Bernardon for the limited activities of fulfilling Bernardon’s employment-related purposes and for compliance with Bernardon’s legal, regulatory, and policy obligations. Bernardon may disclose your Personal Information at its sole discretion to a third party to:
- Service Providers who perform services on our behalf to carry out the uses of Personal Information described above in section titled “Why We Collect Your Personal Information.”
 - Comply with applicable law, regulation, legal process, or governmental request;
 - Protect the security and integrity of the applicant job portal and of Bernardon online assets, products and services;
 - Respond to an incident involving personal data for which Bernardon has direct or indirect responsibility;
 - Protect the property, rights, and safety of Bernardon, our clients, or the public;
 - Prevent harm or illegal activities;
 - Respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person; and
 - Investigate and defend ourselves against any third-party claims or allegations.
- 5. Security of Your Personal Information.** Your Personal Information will be transferred to, stored on, and accessed from Bernardon servers in the U.S. The access, use, storage, transmittal, sharing, and disposal of your Personal Information will be in accordance with Bernardon information security policies and practices and in compliance with applicable U.S. federal and state laws and applicable international laws. Bernardon also requires all third parties that it shares Personal Information with for the Bernardon purposes described above to provide at least the same level of security and privacy protection as Bernardon provides. However, please note that no method of transmitting information over the internet is completely secure and we consequently cannot guarantee the absolute security of your Personal Information.



- 6. Retention of Personal Information.** We retain Personal Information about you for as long as it is needed for the purposes described above in “Why We Collect Your Personal Information,” or as otherwise required by law. Generally, this means we will retain Personal Information about you until the completion of the application process, as well as a reasonable period of time after that where necessary to respond to any inquiries, address with legal matters, or address administrative matters. Where we have no continuing legitimate business need to process Personal Information about you, we will either delete or anonymize it or, if this is not possible (for example, because Personal Information has been stored in backup archives), then we will securely store Personal Information about you and isolate it from any further processing until deletion is possible.
- 7. Our Policy Regarding Children’s Personal Information.** Bernardon does not employ individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from such individuals. In the event we become aware of such processing, we will take steps to delete it.
- 8. Your Rights Regarding Your Personal Information.** You may have certain rights with regard to Bernardon’s collection, use, and sharing of your Personal Information, subject to applicable U.S. and international law. Those rights may include:

 - Requesting information about, and access to, the Personal Information that we collect from you;
 - Asking questions or making complaints about Bernardon’s privacy and data security policies and practices as they apply to your Personal Information;
 - Asking us to correct, update, or delete information that we have collected about you;
 - Asking for a copy of the information that we collected from you;
 - Asking about the third parties who have received your Personal Information; and
 - Contacting us and receiving a response in a reasonable amount of time to questions or complaints about your Personal Information or our privacy and data security policies and procedures.

To exercise any of these rights, and for any questions about Bernardon’ privacy and data security policies, procedures, and practices with regard to information that we collect via the applicant web portal and our follow-up communications regarding your interest in



Bernardon employment, please contact the Chief People Officer, Eric Lane, at hellohr@corestates.com.

9. Additional Information for California Residents. Candidates who are residents of California have certain additional rights under the California Consumer Privacy Act (“CCPA”) as Amended by the California Privacy Rights Act (“CPRA”).

This Privacy Notice describes the Personal Information we collect or process about California residents in connection with the Application Materials and the use of applicant web portal how we use, share, and protect that Personal Information, and what your rights are concerning your Personal Information that we collect or process.

(a) **Personal Information We Collect and Share, and For What Purpose.** In the past 12 months, we have collected and/or disclosed the Personal Information discussed in the chart located in the section above titled “Information We Collect.” This chart also sets forth the categories of third parties to which we disclosed Personal Information for our operational business purposes within the preceding 12 months. In the past 12 months, we have disclosed the above information with the following categories of third parties for a business purpose:

- Service Providers who perform services on our behalf to carry out the uses of Personal Information described above in section titled “Why We Collect Your Information.”
- Comply with applicable law, regulation, legal process, or governmental request;
- Protect the security and integrity of applicant web portal and Bernardon online assets, products and services;
- Respond to an incident involving personal data for which Bernardon has direct or indirect responsibility;
- Protect the property, rights, and safety of Bernardon, our clients, or the public;
- Prevent harm or illegal activities;
- Respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person; and
- Investigate and defend ourselves against any third-party claims or allegations.



(b) **Sensitive Personal Information We Collect and Share, and For What Purpose.** Please note that some of this Personal Information qualifies as Sensitive Personal Information under the CPRA. We do not use or disclose Sensitive Personal Information for purposes other than that which is necessary and proportionate to accomplish the objectives set forth in section 7027 of the Modified Proposed CPRA regulations. Specifically, in the past 12 months, we have collected and/or disclosed the following categories from candidates when they provide application materials:

- Social Security Numbers, drivers' licenses, state identification card information, and passport number;
- Financial account information;
- Precise geolocation information;
- Racial or ethnic origin, religious or philosophical beliefs, or union membership; and
- The contents of an individual's mail, email, and text messages unless the business is the intended recipient of the communication.

We may use this Sensitive Personal Information for purposes of performing services for our business, providing services as requested by you, and ensuring the security and integrity of our business, infrastructure, and the individuals we interact with. This includes, without limitation, receiving and processing your job application, evaluating your suitability for the position(s) you are applying for, conducting background checks, analyzing and monitoring diversity, making you an offer (subject to our discretion), fulfilling administrative functions, complying with law, legal process, or requests from governmental or regulatory authorities, and exercising or defending legal claims.

(c) **Opt-out Preference Signals.** When you submit an opt-out preference signal, we process your request.

(d) **Your Rights as a California Resident.** Under California law, applicants who are California residents have specific rights regarding their Personal Information. These rights are subject to certain exceptions described below. When required, we will respond to most requests within 45 days unless it is reasonably necessary to extend the response time.

- (i) *Right to Correct Inaccurate Information.* You have the right to request that we correct any inaccurate personal information about you, considering the nature of the personal information and the purposes of the processing of the personal



information. Upon a receiving such a request, we shall use commercially reasonable efforts to correct the inaccurate personal information.

- (ii) *Right to Disclosure of Information.* You have the right to request that we disclose the specific pieces of personal information that we have collected about you, such as:
- The categories of Personal Information Bernardon has collected about you in the last 12 months.
 - The categories of sources for the Personal Information Bernardon has collected about you in the last 12 months.
 - Bernardon’s business or commercial purpose for collecting that Personal Information.
 - The categories of third parties with whom Bernardon shares that Personal Information.
 - The specific pieces of Personal Information Bernardon collected about you.
 - If Bernardon disclosed your Personal Information to a third party for a business purpose, a list of the Personal Information types that each category of recipient received.
- (iii) *Right to Limit Our Use of Your Sensitive Personal Information.* You have the right to instruct us to limit our use of your Sensitive Personal Information to that which is necessary to provide the applicant web portal. You may do so either by contacting us below or by clicking on the link titled “**Limit the use and disclosure of my Sensitive Personal Information**” in our footer.
- (iv) *Right to Opt-Out of Sale or Sharing of Personal Information.* You have a right to opt-out of the sale or sharing of your Personal Information for purposes of cross-contextual advertising. While we do not sell candidate Personal Information in the way the term “sell” is commonly used, we do disclose limited cookie data with our business partners and service providers in order to provide and maintain applicant web portal. Such a disclosure may constitute a “sale” for purposes of the CPRA. We have made such disclosures in the past 12 months. If you wish to limit these disclosures, you may do so via the “**Do Not Sell or Share My Personal Information**” link in our footer.



- (v) *Right to Non-Discrimination.* You have the right not to be discriminated against for the exercise of your California privacy rights described above.
 - (vi) *Right to Delete Personal Information.* You have the right to request that we delete any of your Personal Information collected from you and retained, subject to certain exceptions. Upon receiving a verified request to delete your Personal Information, we will do so unless otherwise authorized by law.
- (e) **How to Exercise these Rights.** If you wish to submit a request to exercise one or more of the rights listed above you can do this by emailing Chief People Officer, Eric Lane, at hellohr@corestates.com.

Please include your question or concerns in your letter to us. We will respond to verifiable requests for disclosure or deletion of Personal Information free of charge, within 45 days of receipt.

In order to protect your privacy and the security of your information, we verify consumer requests by requesting identification documents and other documentation necessary to confirm your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose.

- (i) **Authorized Agents.** If you want to make a request as an authorized agent on behalf of a California resident, you may use the submission methods noted above. As part of our verification process, we may request that you provide, as applicable, proof concerning your status as an authorized agent. In addition, we may require the individual on whose behalf you are making the request to verify their own identity or your permission to submit the request.