



**Privacy Policy**  
**for the application process at**  
**MHP Americas, Inc.**

Thank you for your interest in employment with MHP Americas, Inc. This Applicant Privacy Notice (the "Notice") applies to personal information that MHP Americas, Inc. in the United States ("MHP") collect from individuals in California that apply for employment ("Applicants") via our websites. This Notice may be updated from time to time to reflect changes in our practices, and we will post an updated Notice on our website to notify you of any significant changes.

**1. Information we collect and use**

MHP collects personal information that you provide during the application process via an applicant tracking system ("ATS"), which may include the following:

(A) Identifiers such as a real name, postal, internet protocol (IP), and email addresses, and account name, date of birth, social security number, driver's license number, or other similar identifiers.

(B) Personal information described in Cal. Civ. Code Section 1798.80(e) (California Customer Records statute). This means any information that identifies, relates to, describes, or is capable of being associated with a particular individual, including, the "identifiers" listed in the preceding Section (A), and the following phone number, username and password for accounts you may establish on MHP's ATS, physical characteristics or description, educational background, employment-related information and employment history and medical information.

(C) Characteristics of protected classifications under California or federal law, such as demographic information including age (40 years and older), gender, race, citizenship, ethnicity, disability status, veteran status, marital status, criminal record information, disability, medical condition, military and/or veteran, immigration, work permit status, the results of credit and criminal background checks, drug and alcohol testing and other screening procedures; and medical conditions if disclosed to us.

(D) Professional or employment-related information you provide to us. This includes: (a) details contained in letters of application and resumes or CVs you submit (e.g. previous employment background, education history, employment history, professional qualifications, language and other relevant skills, certifications, certification expiration dates); work-related assessments and (b) information necessary to complete a background check.

(E) Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g.; 34 C.F.R. Part 99).

This includes details contained in letters of application and resume/CV such as institutions attended and performance, and the results and scores of evaluations conducted through training programs.

(F) Inferences drawn from any of the information identified in this subdivision to create a profile about an Applicant reflecting the Applicant's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

(G) Sensitive personal information including government identifiers such as social security number, driver's license number or state issued identification number; citizenship, race, color, religion, national origin; and sexual orientation.

## **2. Purposes for which these categories of information are collected**

We use the above-described personal information for our business purposes such as to assess your qualifications for employment and other related services during the application and recruitment stage. This includes contacting you after you have applied, contacting references that you have provided, as well as potentially carrying out background checks. We may use applicant information for benchmarking, analyzing, and reporting on the diversity of candidate pools, individualized reporting and analytics of statistical information, and informing and developing our recruitment and other diversity, equity and inclusion strategies.

We also may use your information to comply with any applicable legal obligations, record-keeping or reporting obligations, as well as to establish, exercise or defend against any legal claims.

We do not use or disclose sensitive personal information for purposes that, under applicable law, are subject to a "Right to Limit" the use or disclosure of sensitive personal information.

## **3. How we share your information**

Within the last 12 months, we have disclosed the categories of personal information identified in the above section titled "Information we collect and use" for our business purposes. In the same period, we have not sold Applicant's personal information or shared it for cross-context behavioral advertising as defined under California law.

In order to carry out the application and recruitment process your information may be shared with MHP employees such as your potential manager(s), colleagues, members of the human resources team as well as other individuals within MHP. Your information also may be shared with various third parties that assist us during the recruitment process. For example, we use third party service providers to collect your information as well as for other services such as carrying out background checks or other pre-employment screenings. We may also share information with third parties when we believe in good faith that the disclosure is required to comply with a court order, subpoena, warrant or legal process. We may also share your information in the event of a merger, acquisition, asset sale or other related transaction, or when we believe in good faith that disclosure is required by law or to protect the safety of our employees, the public or MHP property.

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#### **4. Notice to California residents under 18 years of age**

If you are a registered user of online services under the age of 18, and we have actual knowledge of your age, then under California law you may request and obtain removal of certain content or information you have posted on our online services. To do so, please contact us at the address, phone number or email address mentioned within this Statement. Please note that removal does not ensure complete or comprehensive removal of the content. For example, removal may not be possible or permitted if another provision of law requires the content to be maintained, if it was posted or reposted by others, or if we paid compensation to you in exchange for the posting.

#### **5. Your California Privacy Rights**

Subject to applicable law, Applicants may have one or more of the following rights.

Right to know. You may have the right to request that we disclose certain information to you about our collection and use of your personal information including

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties to which we sold, shared, or disclosed that personal information.
- The categories of personal information about you that we sold, shared, or disclosed for a business purpose.
- The specific pieces of personal information we collected about you.

Right to Delete. You may have the right to request that we delete personal information we have collected from you.

Right to Correct. You may have the right to request that we correct inaccurate personal information that we have collected about you.

Right to Non-Discrimination. Subject to applicable law, we may not discriminate against you for exercising any of the above-listed rights or any other rights under the California Consumer Privacy Act, including by not retaliating against you for your exercise of the above rights.

As required or permitted by law, we may take steps to verify your request before we can provide personal information to you, correct personal information, delete personal information, or otherwise process your request. To verify your request, we may require you to provide your name, physical address, email address, or contact information. If we believe we need further information to verify your request as required by law, we may ask you to provide additional information to us.

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We may also limit our response to your exercise of rights as permitted by law. For example, if you request deletion, we may need to retain certain personal information to comply with our legal obligations or other permitted purposes.

We will deliver personal information that we are required by law to disclose to you in the manner required by law within 45 days (or the applicable statutory timeframe) after receipt of a verifiable request, unless we notify you that we require additional time to respond, in which case we will respond within such additional period required by law. We may deliver the personal information to you electronically or by mail at your option. If electronically, then we will deliver the information in a portable and, to the extent technically feasible, in a structured, commonly used, machine-readable format that allows you to transmit the information from one entity to another without hindrance.

You may request to exercise your rights by submitting a written request to [hr-services-americas@mhp.com](mailto:hr-services-americas@mhp.com). Please make sure that you identify yourself as a job applicant when submitting your request.

You may designate an authorized agent to request any of the above rights on your behalf. You may make such a designation by providing the agent with a signed written permission stating that the agent is authorized to make the request on your behalf. If you are submitting a request through an authorized agent, we may, as permitted by law, require that the authorized agent provide proof that you gave the authorized agent signed permission to submit the request, require you to verify your identity directly with us and to directly confirm with us that you have provided the agent with your permission to submit the request on your behalf.

## **6. Accessibility**

If you use assistive technology and the format of this Notice interferes with your ability to access information, please contact us at [hr-services-americas@mhp.com](mailto:hr-services-americas@mhp.com).

## **7. Questions**

If you have any questions or suggestions regarding this Applicant Privacy Notice, please do not hesitate to contact us at [recruiting-americas@mhp.com](mailto:recruiting-americas@mhp.com).

This Notice was last updated on January 1, 2023.

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