

CPRA PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES AND APPLICANTS

This Privacy Notice for California Employees and Applicants ("Notice") of ARCO Companies ("ARCO," "we," "us," or "our") applies to (1) current and former employees, referred to throughout this Notice as "Associates" (consistent with ARCO's status as an employee-owned company), and (2) job applicants and candidates for employment, who reside in the State of California (collectively, "you"). We adopt this Notice to comply with the California Privacy Rights Act ("CPRA") and other California privacy laws. Any terms defined in the CPRA have the same meaning when used in this Notice. References to "Associates" in this Notice have the same meaning as "employees" under the CPRA and other applicable law.

This Notice serves both as our "notice at collection" and as our CPRA "privacy policy." It describes our practices going forward and, as required by the CPRA, describes the categories of personal information we have collected, used, and disclosed about Associates and applicants during the 12 months preceding the Effective Date below.

Your CPRA Rights

Under California law, our California Associates and applicants have the following rights:

- The right to receive disclosure about our Information Collection Practices. This disclosure is provided below.
- The right to receive disclosure about our Information Disclosure Practices. This disclosure is provided below.
- The right to tell us not to sell your personal information. ARCO does not sell your personal information.
- The right to tell us not to share your personal information for behavioral or cross-context marketing purposes. ARCO does not share your personal information for this purpose.
- ARCO does not have actual knowledge that it sells or shares the personal information of individuals under the age of 16.
- The right to tell us not to process your Sensitive Personal Information for purposes other than the purposes for which it was originally collected. ARCO only processes Sensitive Personal Information for the purpose for which it was originally collected.
- The right to request that we correct information that is incorrect. Please see below for how to exercise this right.
- The right to request a copy of Personal Information we collected about you during the past 12 months or, at your option, since January 1, 2022, subject to certain exceptions. Please see below for how to exercise this right.
- The right to request that we delete Personal Information subject to certain exceptions. Please see below for how to exercise this right.

Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or device ("personal information"). We collect and use personal information for recruitment, human resources, employment, benefits administration, health and safety, and business-related purposes, to comply with applicable law. The following table describes the categories of personal information we [may] collect about Associates and applicants in the preceding 12 months:

Category	Examples	Collected from Associates/applicants
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES

B. Personal information categories Protected under the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, medical information. Some personal information included in this category may overlap with other categories.	YES
C. Protected anti-discrimination classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), veteran or military status.	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	NOT COLLECTED	NO
F. Internet or other similar network activity.	Browsing history, search history, information on your interaction with company systems, websites, applications, etc.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Application materials, resume/CV, interview and phone-screening notes, references, background check results, current or past job history, and performance evaluations.	YES
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)).	NOT COLLECTED	NO
K. Sensitive Personal Information	Social Security, driver's license, state identification card, or passport number, account log-in in combination with any required security or access code, password, or credentials allowing access to an account, racial or ethnic origin.	YES
L. Inferences drawn from other personal information.	Inferences used for workforce analytics, benchmarking, and evaluating candidate or Associate qualifications.	YES

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated Associate or applicant information.

Sources of Personal Information

We collect the categories of personal information described above from the following sources:

- Directly from you, such as through job applications, onboarding paperwork, and workplace systems.
- From third parties, such as staffing partners, references, background check providers, and prior employers.
- From publicly available sources, including online professional profiles (e.g., LinkedIn), where relevant to an application or a potential future application.
- From current ARCO Associates, if you were referred for a position by an Associate.

Information Collection Practices: How We Collect and Use Personal Information

We use Personal Information to:

- Comply with all applicable laws and regulations.
- Recruit, evaluate, and communicate with job applicants and candidates for employment based on skills, qualifications, and experience, including through interviews, phone screenings, and skills assessments.
- Conduct background checks.
- Where requested by you, assist with obtaining an immigration visa or work permit.
- If you are offered and accept employment with ARCO, incorporate the information collected during recruitment into your employment record.
- Manage your employment relationship with us, including for: onboarding processes; timekeeping, payroll, and expense report administration; Associate benefits administration; Associate training and development requirements; the creation, maintenance, and security of your online Associate accounts; reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill; workers' compensation claims management; Associate job performance, including goals and performance reviews, promotions, discipline, and termination; other human resources purposes.
- Manage and monitor Associate and applicant access to company facilities, equipment, and systems.
- Conduct internal audits and workplace investigations.
- Investigate and enforce compliance with and potential breaches of Company policies and procedures.
- Engage in corporate transactions requiring review of Associate or applicant records, such as for evaluating potential mergers and acquisitions of the Company.
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking.
- For client marketing purposes.
- Administer and maintain the Company's operations, including for safety purposes.
- Exercise or defend the legal rights of the Company and its Associates, affiliates, customers, contractors, and agents.
- We use and process Sensitive Personal Information to comply with laws including anti-discrimination laws and disability accommodation laws.

Information Disclosure Practices

ARCO may disclose Personal Information of Associates and applicants for a business purpose to service providers or contractors who assist us in administering our workforce and recruitment processes, including staffing and recruiting partners; background check and reference-verification vendors; benefits providers; payroll and expense administrators; worker's

compensation vendors and government agencies; professional advisors such as attorneys, auditors and accountants; and, where appropriate, law enforcement or government regulators.

We do NOT sell Associate or applicant Personal Information.

We do NOT share Associate or applicant Personal Information with third parties for behavioral or cross-context marketing purposes..

Processing Sensitive Personal Information

We do NOT process Sensitive Personal Information for purposes other than the purpose for which it was originally collected.

Retention of Your Information

We retain Associate Personal Information for as long as needed to fulfill the purposes described in this Notice, including for the duration of your employment and as needed thereafter to meet legal, tax, insurance, and recordkeeping obligations.

If you apply for a position and are not hired, or you withdraw your application, we retain your application information for a period after the application in order to defend against potential legal claims, consider you for other current or future roles, and evaluate and improve our recruitment process. If you do not want us to retain your information for consideration for other roles, contact us using the information below; we may nonetheless retain certain information as required by law or to protect against legal claims.

How to request correction of your information

If you believe that information that we hold about you is incorrect or needs to be updated, please contact hr@arco1.com or call 1-800-348-3655. You can make this request at any time. We will acknowledge receipt of your request within 10 business days and we will correct your information promptly (and at least within 45 days) after verifying your request.

How to request a copy of your information

If you would like to receive a copy of the information collected about you during the past 12 months (or at your option, since January 1, 2022) please contact hr@arco1.com or call 1-800-348-3655. Certain information will not be released to you because of legal restrictions or because the information is used for security purposes. You may make this request up to twice in any calendar year. We will acknowledge receipt of your request within 10 business days and provide a copy of your information in an easily readable format within 45 days. If we need an additional 45 days to compile your information we will let you know.

How to request deletion of your information

If you would like us to delete information that we are permitted by law to delete, please contact hr@arco1.com or call 1-800-348-3655. We are not permitted to delete information that we need in order to operate our business, administer our Associates, protect our legal obligations and rights, or to provide security for our Associates, our systems and our company. You may make this request up to twice in any calendar year. We will acknowledge receipt of your request within 10 business days and honor your request within 45 days. If we need an additional 45 days to respond we will let you know.

Data Storage and Security

We use a reasonable standard of care to store and protect your Personal Information, including appropriate physical, technical and organizational security measures designed to protect Personal Information from unauthorized use, loss, alteration, destruction or disclosure.

Non-Discrimination

We will not discriminate against you as a result of your exercise of any of these rights.

Questions

If you have any questions about this Notice or need to access this Notice in an alternative format due to a disability, please contact hr@arco1.com or call 1-800-348-3655.

Changes to This Notice

We reserve the right to amend this Notice at our discretion at any time. When we make changes to this Notice, we will post the updated notice and update the Effective Date.

Effective Date: August 25, 2026