

Applicant Privacy Notice

Last Updated: **August 14, 2025**

Russell Sigler, Inc. (“Sigler” or the “Company”) takes your privacy seriously. We want you to know how we collect, use, and disclose, your personal information.

EEO Statement

The Company is an equal employment opportunity employer. The Company’s policy is not to unlawfully discriminate against any applicant or employee on the basis of race, color, sex, religion, national origin, age, disability, or any other consideration made unlawful by applicable federal, state, or local laws. The Company also prohibits harassment of applicants and employees based on any protected category, characteristic or status. It is also the Company’s policy to comply with all applicable state, federal and local laws respecting consideration of unemployment status in making hiring decisions.

The Company complies with the ADA, the ADAAA and applicable state law and considers reasonable accommodation measures that may be necessary for qualified applicants/employees to perform the essential functions of the job. Hire may be contingent upon a post-offer medical examination, and to skill and agility tests, as appropriate for the position.

Assistance For The Disabled

Alternative formats of this Privacy Notice are available to individuals with a disability. Please contact HumanResources@siglers.com for assistance.

This Privacy Policy explains:

1. [The categories of personal information we collect about you](#)
2. [The categories of sources from which we collect your personal information](#)
3. [The purposes for which we use your personal information](#)
4. [How we may disclose your personal information](#)
5. [How long we keep your personal information](#)
6. [Additional information for applicants who are California residents](#)
7. [Changes to this Privacy Notice](#)

Scope:

This Privacy Policy applies to the personal information of individuals in their role as job applicants to the Company (“Applicants”).

“Personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Applicant.

1) THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect the following categories of personal information. Not all categories may be collected about every Applicant.

- **Identifiers**, for example: real name, nickname, telephone number, postal address, e-mail address, and signature.
- **Professional or Employment-Related Information**, for example: educational institutions attended, degrees and certifications, licenses, work experience and previous employers, and professional memberships and affiliations.
- **Non-public educational information**, for example: academic transcripts.

- **Commercial Information**, for example: travel expense records for an interview.
- **Internet or Other Electronic Activity Information**, for example: interactions with the Company's Internet web site, job application, or job advertisement, and publicly available social media activity.
- **Sensory or Surveillance Data**, for example: voicemails and footage from video surveillance cameras if you visit our offices or stores during the application process.
- **Physical description**, for example: photograph for a security badge or if submitted as part of application materials.
- **Other details**, for example, hobbies and leisure activities or membership in voluntary/charitable/public organizations, for example, as stated on the Applicant's resume.
- **Characteristics of Protected Classifications Under State or Federal Law for Applicants**, collected on a purely voluntary basis, except where collection is required by law, for example, in response to a request for an accommodation, and used only in compliance with applicable laws and regulations.

2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information from the following categories of sources. Not all categories apply to every Applicant.

- **You**, for example: in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process.
- **Vendors and service providers**, for example: recruiters.
- **Third parties**, for example: job references, professional employer organizations or staffing agencies.
- **Public internet sources**, for example: social media, job boards, public profiles, and other public online sources
- **Public records**, for example: court records, and credentialing and licensing organizations.
- **Automated technologies** on the Company's electronic resources, for example, to track logins and activity on the Company's careers page.
- **Surveillance/recording technologies installed by Sigler**, for example: video surveillance in common areas of Company facilities, voicemail technologies, or webcams.
- **Government or administrative agencies**, for example, law enforcement or public health authorities.

Note: This Privacy Notice does not cover background screening conducted by third-party background check vendors subject to the federal Fair Credit Reporting Act. The Company provides a separate disclosure for such screening.

3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

We may use the personal information we collect for one or more of the following purposes:

A. Generally Applicable Purposes

Unless stated otherwise in section 3.B, below, we may use Applicants' personal information for the following purposes:

Recruiting, including:

- To evaluate Applicants' qualifications or suitability for employment with the Company
- To communicate with Applicants
- To conduct a pre-employment or criminal history background check
- For identification purposes
- For diversity and inclusion purposes
- To arrange and manage Company-sponsored events
- To create a talent pool for future job openings
- For recordkeeping purposes

- To demonstrate Applicants' agreement to, or acceptance of, documents presented to them, *e.g.*, acknowledgment of employment application, or offer letter
- To evaluate and improve the recruiting process
- To promote Sigler as a place to work

Monitoring, Security, and Compliance, including:

- To monitor use of Company facilities and information systems
- To conduct internal audits and investigations
- To protect the safety and security of the Company's facilities
- To administer the Company's whistleblower hotline
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise the Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

Conducting Our Business, including:

- For training purposes or quality assurance with respect to Company employees conducting the interviews or otherwise assisting with the recruiting and hiring process
- For travel and event planning
- To engage in crisis management
- To manage travel reimbursements

Miscellaneous Other Purposes:

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning;
- To manage litigation involving the Company, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or our financial status; and
- To protect the rights, property, or safety of the Company, Applicants, customers or others.

B. Purposes Specific To Certain Categories Of Personal Information

We may use the categories of Applicants' personal information listed in this Section 3.B for the purposes stated below:

Purposes For Using Applicants' Health Information:

- To the extent necessary to comply with the Company's legal obligations, such as to accommodate disabilities
- To protect the health and safety of the Company's employees and facilities, for example, to take the Applicant's temperature
- For occupational health and safety compliance and record-keeping
- To conduct pre-employment medical examinations
- To respond to an Applicant's medical emergency

Note: This Privacy Notice does not cover health information governed by the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act), or California's Confidentiality of Medical Information Act (CMIA) because these laws have their own disclosure requirements.

Purposes For Using Applicants' Protected Categories Of Information:

The Company collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, The Office of Federal Contracting Compliance Programs (applicable to government contractors), and state laws.

Sigler also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and state law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

Sigler generally maintains personal information related to Applicants as confidential. However, from time to time, the Company may have a legitimate business need to disclose Applicants' personal information for one of the purposes listed in [Section 3](#), above, to one or more of the categories of external recipients listed below. In that event, Sigler discloses your personal information only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by applicable laws.

- **Your direction:** We may disclose your personal information to third parties at your direction.
- **Service providers and contractors:** The Company discloses your personal information to service providers and contractors for the purposes above to assist us in our recruiting efforts and in meeting our business needs and legal obligations. Service providers and contractors include recruiters, law firms, travel agencies, and any other entity providing services to Sigler.
- **Government or administrative agencies:** These may include, for example, the Equal Employment Opportunity Commission as required for reporting, state equal employment agencies as required to respond to employment claims and charges, and law enforcement in the event of criminal investigations.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of the Company, Applicants, or others.

5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

If the Company hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. The Company will retain application information for the entire duration of your employment relationship and for as long thereafter as permitted or required by applicable law. Sigler makes its document retention schedule available to employees for review.

The Company will retain information of applicants who are not hired for at least one year and longer if required by applicable law, such as for four years for California residents. These records will be retained for our internal recordkeeping and reporting purposes. During this retention period, we may use your information to consider you for positions in addition to the position(s) for which you initially applied.

6) ADDITIONAL INFORMATION FOR APPLICANTS WHO ARE CALIFORNIA RESIDENTS

This Section 6 applies only to Applicants who are residents of the state of California.

California Notice at Collection for California Residents

The Company collects personal information identified in [Section 1](#) of this Privacy Notice for the purposes identified in [Section 3](#) and retains it for the period described in [Section 5](#). We do not sell your personal information or disclose it for cross-context behavioral advertising (“sharing”). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

A. Additional Information Regarding Disclosures of Personal Information

The California Consumer Privacy Act (“CCPA”) requires that we provide you with the following information about sales and “sharing” and disclosures of your personal information to third parties for “business purposes”, as those terms are defined in the CCPA:

- **Service providers:** Sigler may disclose to service providers any of the categories of personal information listed in [Section 1](#), above, for the business purpose of performing services on the Company’s behalf and, in particular, for the specific purposes described in [Section 3](#), above.
- **Auditors, lawyers, consultants, and accountants engaged by the Company:** Sigler may disclose the categories of personal information listed in [Section 1](#), above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on the Company’s behalf.

No sales or sharing

The Company does not sell or “share” (disclose for cross-context behavioral advertising) your personal information in connection with the recruiting process. In addition, we have no actual knowledge that we sell or share the personal information of individuals of any age in connection with the recruiting process, including the personal information of children under 16.

B. Your California Privacy Rights

Subject to applicable law, Applicants have the following rights:

- **Right to Know:** You have the right to submit a verifiable request up to twice in a 12-month period for specific pieces of your personal information and for information about Sigler’s collection, use, and disclosure of your personal information.

Please note that the CCPA’s right to obtain “specific pieces” does not grant a right to the whole of any document that contains personal information, but only to discrete items of personal information. Moreover, Applicants have a right to know categories of sources of personal information and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients.

- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to Sigler.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by Sigler, taking into account the nature of the personal information and the purposes of processing the personal information.

Inferring characteristics: The Company does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about California residents.

Note on Deidentified Information

At times, the Company converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual ("Deidentified Information"). Sigler maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that we may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual.

C. How to Exercise Your Rights

The Company will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call 877-672-7789, ext. 1101
- Email HumanResources@siglers.com

D. How We Will Verify Your Request

If you submit a request, we match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (e.g., a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

E. Authorized Agents

You may designate an authorized agent to exercise your right to know, to correct, or to delete. If an authorized agent submits a request on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity. You can obtain our "Authorized Agent Designation" form by contacting us at HumanResources@siglers.com.

In the alternative, you can provide a power of attorney compliant with the California Probate Code.

F. The Company's Non-Discrimination and Non-Retaliation Policy

The Company will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the CCPA.

7) CHANGES TO THIS PRIVACY NOTICE

If we change this Privacy Notice, we will post those changes on this page and update the Privacy Notice modification date above.

For More Information

For questions or concerns about the Company's privacy policies and practices, please contact us at HumanResources@siglers.com.