



ACU-IT-21PL001 R00

PRIVACY POLICY

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Review and Approval

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The Right Way, The Safe Way



Revision Summary		
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1.0 OBJECTIVE

This Privacy Policy describes how Rockwood Service Corporation and all affiliates and subsidiaries (“we,” or “us”) uses, discloses, and processes your Personal Information (“you” and “your”). We reserve the right to change this Privacy Policy at any time. If we change our Privacy Policy, we will post an updated version on this website. Please check back periodically to see if our Privacy Policy has been updated. Updates to the Privacy Policy will be referenced by the "Revision Date" date shown above.

2.0 DEFINITIONS

“**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 person or household. “Personal Information” does not include: (i) publicly available information or lawfully obtained, truthful information that is a matter of public concern; or (ii) information that is deidentified or aggregate information.

“**Sensitive Personal Information**” means Personal Information that reveals information such as: (a) social security, driver’s license, state identification card, or passport number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) precise geolocation; (d) racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of an mail, email, and text messages unless we are the intended recipient of the communication; (f) genetic data; and (g) information about a known child. Sensitive Personal Information includes the processing of biometric information for the purpose of uniquely identifying an individual, Personal Information collected and analyzed concerning an individual’s mental or physical health and Personal Information collected and analyzed concerning an individual’s sex life or sexual orientation. Sensitive Personal Information that is publicly available is not considered Sensitive Personal Information or Personal Information.

3.0 INFORMATION WE COLLECT

Information We Collect, the Categories of Source of Collection and the Purpose for Collection

Set forth below are the categories of Personal Information we collect and that have collected in the preceding 12 months, the categories of sources from which the Personal Information was collected and the business or commercial purpose for such collection.



Category of Personal Information	What We Collect	Categories of Sources from which Personal Information Collected	Business or Commercial Purposes for Collection
PERSONAL INFORMATION			
Identifiers	Real name Alias (preferred name) Postal address Unique personal identifier Online identifier (e.g., iCims ID) Internet protocol address Email address Telephone number Account name Salesperson profile Bank account number Credit card number Debit card number	Directly from you Automatically, such as when you visit our website (e.g., cookies on our websites) Our service providers	To provide you with our services To provide customer service To communicate with you To detect and prevent fraud against you and/or us To create and manage your account To provide you with marketing offers To develop and provide advertising tailored to your interests To analyze the use of our services and sites To determine the effectiveness of our advertising To process payments To consider you for employment with us
Protected Characteristics	Race Sex/gender Military or veteran status Disability (mental and physical including HIV/AIDS, cancer, and genetic characteristics)	Directly from you	In connection with your employment application process, as required by law or as voluntarily disclosed To assess the need to provide job accommodations
Commercial Information	Records of personal property, products or	Directly from you	To provide you with our services To provide customer service



	services purchased, obtained, or considered		<p>To provide you with marketing offers</p> <p>To develop and provide advertising tailored to your interests</p> <p>To analyze the use of our services and sites</p>
Internet Information	<p>Electronic network activity information</p> <p>Browsing history</p> <p>Search history</p> <p>Information regarding interaction with a website, application, or advertisement</p>	<p>Directly from you</p> <p>Automatically</p>	<p>To make it easier for you to use our sites</p> <p>To improve our sites, set default options, and provide you with a better website experience</p> <p>To protect the security of our sites</p> <p>To detect and prevent fraud against you and/or us</p> <p>To provide you with marketing offers</p> <p>To develop and provide advertising tailored to your interests</p>
Geolocation Data	Internet protocol address	Automatically	<p>To make it easier for you to use our sites</p> <p>To improve our sites, set default options, and provide you with a better website experience</p> <p>To protect the security of our sites</p> <p>To detect and prevent fraud against you and/or us</p>
Audiovisual Information	Electronic information (e.g., meeting recordings)	<p>Directly from you</p> <p>Automatically</p>	To keep records of certain meetings



	Visual information (e.g., camera footage)		To provide security and surveillance To detect and prevent fraud
Professional or Employment-Information	Professional history Employment history	Directly from you	To consider you for employment with us
Education Information	Educational history	Directly from you	To consider you for employment with us
Inferences	Profiles of individuals at customers	Directly from you Automatically	To increase sales and make sales

4.0 COOKIES

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. We use cookies or similar technologies, such as web beacons and tracking pixels to analyze trends, administer our website, personalize content and ads, track users' movements around our website to provide you with the most relevant browsing experience, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or of the service we provide as some of our features or services may not function properly without cookies.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Functionality/preference cookies. These are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Statistical, analytical or performance cookies. These allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.



Marketing/targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Third party cookies. These cookies are placed on your device by a website from a domain other than our website. Please note that various third parties may also use these types of cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies.

If you want to remove existing cookies from your device you can do this using your browser options. If you want to block future cookies being placed on your device you can change your browser settings to do this. Please bear in mind that deleting and blocking cookies may have an impact on your user experience as parts of the site may no longer work. Unless you have adjusted your browser settings to block cookies, our system may issue cookies as soon as you visit our site or click on a link in a targeted email that we have sent you, even if you have previously deleted our cookies.

In addition, we use web beacons and pixels, which are images that can be placed in web pages and some forms of email. These technologies can be used to deliver cookies and to collect information about your use of the site. Finally, we may also collect information through tracking pixels. A tracking pixel is a transparent graphic image (usually 1 pixel x 1 pixel or Javascript tag) that is placed on a web page and, in combination with a cookie, allows us to collect information regarding the use of the page of the site that contains the tracking pixel. We may use tracking pixels to trigger ads on participating websites based on activity tracked from the browser on a device used to visit our Sites. Other entities may have access to some of this information.

By using your website and services you affirmatively agree to the use of cookies disclosed in this Privacy Policy.

5.0 PERSONAL INFORMATION WE SELL, SHARE OR DISCLOSE AND THE PURPOSE FOR IT

We do not sell your Personal Information as that term is commonly understood to be disclosure of your Personal Information in exchange for money. Rather, as used herein, definition of sale includes situations where another company can use your Personal Information for its own purposes, which may be considered a sale under certain laws. We may also share with others certain Personal Information we have collected from you for cross-context behavioral advertising (targeted advertising). Please also see the Cookies section above (*e.g.*, marketing/targeting cookies, third party cookies and pixels).

The chart below shows the categories of Personal Information we may sell or share or that we may have sold or shared in the past 12 months, the categories of third parties to whom we may have sold or shared Personal Information and the business purpose for the sale or sharing of the Personal Information.



Categories of Personal Information that We Have Sold or Shared in the Past 12 Months	Categories of Third Parties to Whom We Have Sold or Shared Personal Information	Business Purposes for Sale or Sharing of Personal Information
PERSONAL INFORMATION		
Identifiers	Our affiliate entities Social media companies Data analytics providers like Google Analytics Third party advertising partners Third parties for marketing partners	As part of data management in our corporate groups* For analytics purposes For advertising purposes For marketing purposes
Commercial Information	Our affiliate entities Social media companies Data analytics providers like Google Analytics Third party advertising partners Third parties for marketing partners	As part of data management in our corporate groups* For analytics purposes For advertising purposes For marketing purposes
Internet Information	Our affiliate entities Social media companies Data analytics providers like Google Analytics Third party advertising partners Third parties for marketing partners	As part of data management in our corporate groups* For analytics purposes For advertising purposes For marketing purposes
Geolocation Data	Our affiliate entities Social media companies Data analytics providers like Google Analytics Third party advertising partners	As part of data management in our corporate groups* For analytics purposes For advertising purposes For marketing purposes



	Third parties for marketing partners	
Professional or Employment-Information	Our affiliate entities Social media companies Data analytics providers like Google Analytics Third party advertising partners Third parties for marketing partners	As part of data management in our corporate groups* For analytics purposes For advertising purposes For marketing purposes
Education Information	Our affiliate entities Social media companies Data analytics providers like Google Analytics Third party advertising partners Third parties for marketing partners	As part of data management in our corporate groups* For analytics purposes For advertising purposes For marketing purposes

*We work closely with other businesses and companies that fall under our corporate group who may have access to your Personal Information. This may be considered a sale of Personal Information.

We also use third party advertising companies to place ads on other sites. We do this by allowing our advertising and social media partners to place their cookies on a browser of an individual who visits our sites. The data received by our third party advertising and social media partners allows them to measure the effectiveness of such advertising and to provide advertisements on other websites about our services which are tailored to your interests.

We use Google Analytics to ensure website functionality and improve our website and services. This software may record information such as your IP address, location, age and gender, browser type and language, operating system, access time, duration of visit, pages you view within our website, search terms you enter and other actions you take while visiting us, the pages you view immediately before and after you access the services, how often you use our Services, aggregated usage and performance data, app errors and debugging information. Google Analytics is owned and controlled by Google LLC. Data collected by Google is subject to its privacy policy. To learn how Google uses data related to website analytics, please click here **[Link: <https://policies.google.com/technologies/partner-sites>]**. You may opt-out of having your activity on our website made available to Google Analytics by installing the Google Analytics browser add-on, available here **[Link: <https://tools.google.com/dlpage/gaoptout>]**.



Under California law, the disclosure of data received by our third party advertising and social media partners may be considered a sale of Personal Information.

We do not have actual knowledge that we sell or share the Personal Information of consumers under 16 years of age.

In addition, we disclose and have disclosed in the preceding 12 months Personal Information to our service providers and contractors for the following business purposes.

Auditing of Ad Impression: We disclose Personal Information for auditing purposes related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.

Security and Fraud Detection: We disclose Personal Information for our security and fraud detection services including detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; and prosecuting those responsible for that activity.

Functionality & Debugging: We disclose Personal Information to engage in debugging to identify and repair errors that impair existing intended functionality.

Services on Our Behalf: We disclose Personal Information in order to receive services performed on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf.

Advertising and Marketing Services: We disclose Personal Information to provide advertising or marketing services on our own behalf.

The following chart sets forth the categories of Personal Information we have disclosed to our service providers for a business purpose over the past 12 months.

Categories of Personal Information that We Disclose	Business Purposes for the Disclosure of Personal Information
PERSONAL INFORMATION	
Identifiers	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services



Protected Characteristics	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services
Commercial Information	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services
Internet Information	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services
Geolocation Data	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services
Audiovisual Information	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services



Professional or Employment-Information	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services and Services
Education Information	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services
Inferences	Auditing of Ad Impression Security and Fraud Detection Functionality & Debugging Services on Our Behalf Advertising and Marketing Services

As Necessary: We may also disclose Personal Information, as necessary: (a) to comply with any legal process; (b) to respond to requests from public and government authorities; (c) to enforce our terms and conditions; (d) to protect our operations and protect our rights, privacy, safety or property, and/or that of you or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain. We may also use Personal Information in connection with or during negotiation of any reorganization, acquisition, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We only use Sensitive Personal Information for purposes disclosed herein. We do not use or disclose Sensitive Personal Information for purposes other than those specified herein.

6.0 OUR RETENTION POLICY – HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will retain each category of your Personal Information identified above for an amount of time that is reasonably necessary for us to use the information for the purposes disclosed herein and for any other permitted purposes, including retention of Personal Information pursuant to any applicable contract, law or regulation. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal



Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

7.0 CHILDREN

We do not direct our websites or applications to children under thirteen (13) years of age. We do not knowingly collect information from persons under 13 years of age or provide any personal information from such persons to any third party for any reason whatsoever. We do not allow persons known to be under 13 years of age to receive direct marketing communications from us. No information should be submitted to our websites or applications by persons under 13 years of age. When appropriate, we may ask you to indicate your date of birth to verify compliance with the age requirements set forth herein.

8.0 YOUR RIGHTS IF YOU ARE A RESIDENT OF CALIFORNIA

California residents may exercise certain privacy rights pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2023, and related regulations. Your right to submit certain requests as a California resident are described below. Please note that these rights are subject to certain exceptions and certain of these rights are subject to verification mechanisms.

Right to Know Personal Information Collected About You. You have the right to know: (1) the categories of Personal Information we have collected about you; (2) the categories of sources from which the Personal Information is collected; (3) the business or commercial purpose for collecting, selling, or sharing Personal Information; (4) the categories of third parties to whom we disclose Personal Information; and (5) the specific pieces of Personal Information we have collected about you. You also have the right to know the list of all third parties to whom we have disclosed Personal Information, as defined under California Civil Code Section 1798.83(e) (a/k/a the "Shine the Light Law"), during the preceding year for third-party direct marketing purposes. You may submit a request by calling us at 833-706-0061 or emailing us at privacy@acuren.com.

Right to Know Personal Information Disclosed, Sold or Shared and to Whom. You have the right to request that we disclose to you: (1) the categories of Personal Information that we collected about you; (2) the categories of Personal Information that we sold or shared about you and the categories of third parties to whom the Personal Information was sold or shared, by category or categories of Personal Information for each category of third parties to whom the Personal Information was sold or shared; and (3) the categories of Personal Information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose. You may submit a request by calling us at 833-706-0061 or emailing us at privacy@acuren.com.

Right to Request Deletion of Your Personal Information. You have the right to request that we delete your Personal Information, subject to a number of exceptions. Following receipt of a request, we will let you know what, if any, Personal Information we can delete from our records. If we cannot delete all of your Personal Information, we will let you know the reason. You may submit a request by calling us at 833-706-0061 or emailing us at privacy@acuren.com.



Right to Correct Inaccurate Information. If you believe that any of the Personal Information we maintain about you is inaccurate, you have the right to submit a request for us to correct that information. Upon receipt of a request, we will use commercially reasonable efforts to correct the information as you direct. You may submit a request by calling us at 833-706-0061 or emailing us at privacy@acuren.com.

Right to Opt-Out of the Sale and Sharing of Your Personal Information. You may opt-out of the sale or sharing of your Personal Information, to the extent applicable, by clicking here.

Right to Limit the Use of Your Sensitive Personal Information. We do not collect or use any of your Sensitive Personal Information. Accordingly, this right does not apply to you.

Right to Non-Discrimination for Exercising Your Rights. If you choose to exercise any of your rights, you have the right to not receive discriminatory treatment by us.

When you make a request to know, delete and/or correct, to help protect your privacy and maintain security, we will take steps to verify your identity. Our verification procedure may differ depending on whether you have an account with us or not and the request you are making. The following generally describes the verification processes we use:

Password Protected Accounts. If you have a password-protected account with us, we may use existing authentication practices to verify your identity but will require re-authentication before disclosing, correcting or deleting data. If we suspect fraudulent or malicious activity relating to your account, we will require further verification (as described below) before complying with a request to know or delete.

Verification for Non-Accountholders. If you do not have, or cannot access, a password-protected account with us, we will generally verify your identity as follows:

For requests to know categories of Personal Information, we will verify your identity to a reasonable degree of certainty by matching at least two data points provided by you with reliable data points maintained by us.

For requests to know specific pieces of Personal Information, we will verify your identity to a reasonably high degree of certainty by matching at least three data points provided by you with reliable data points maintained by us. We will also require a declaration, signed under penalty of perjury, that the person requesting the information is the person whose information is the subject of the request or that person's authorized representative. We will maintain all signed declarations as part of our records.

For requests to correct or delete Personal Information, we will verify your identity to a reasonable degree or a reasonably high degree of certainty depending on the sensitivity of the Personal Information and the risk of harm posed by unauthorized deletion. We will act in good faith when determining the appropriate standard to apply.

If there is no reasonable method by which we can verify your identity, we will state so in response to a request to know or delete Personal Information, including an explanation of why we have no reasonable method to verify your identity.

If you use an authorized agent to submit a request to know, delete or correct, we may require the authorized agent to provide proof that you gave the agent signed permission to submit the



request. We may also require you to do either of the following: (a) verify your own identity directly with us; or (b) directly confirm with us that you provided the authorized agent permission to submit the request. This requirement does not apply if you have provided the authorized agent with power of attorney pursuant to California Probate Code sections 4121 to 4130.

We will respond to requests to know, requests to delete and / or delete no later than 45 calendar days. If we cannot verify your request within 45 days, we may deny your request. If necessary, we may take up to an additional 45 days to respond to your request but in such an event will provide you a notice and an explanation of the reason that we will take more than 45 days to respond to your request.

Regarding your rights to opt-out of the sale and sharing of Personal Information, in addition to the links above, you can also exercise your right to opt-out by using a browser that supports an opt-out preference signal (also known as a Global Privacy Control (GPC)). If you choose to use this signal, you will need to turn it on for each browser you use.

9.0 NEVADA PRIVACY NOTICE

Nevada law provides that Nevada residents may opt-out of the “sale” of “covered information” to third parties, including but not limited to name, address, social security number, and online service activity. Our uses of your personal information are not sales under Nevada law, so no opt-out is required.

10.0 HOW TO CONTACT US

If you have any questions or concerns about our privacy policies and practices, please feel free to contact us by calling us at 833-706-0061, emailing us at privacy@acuren.com or writing to us at 14434 Medical Complex Drive, Suite 100, Tomball, Texas 77377.