

RPM International Inc.

Employment Applicant Privacy Notice (Canada, Europe, and the United States)

Scope and Overview

This Employment Applicant Privacy Notice (“Notice”) describes how RPM International Inc. and its subsidiaries (collectively the “Company” or “we”) collect and use Personal Information during the employment application and recruitment process. This Notice *applies to job applicants only* and applies to all employment positions. For purposes of this Notice, the term “Personal Information” means any information, or a combination of pieces of information, that can reasonably identify an individual, and that is subject to, or otherwise afforded protection under, an applicable data protection law, statute, or regulation.

This Notice describes the Personal Information that the Company could collect, use, retain, and disclose to third parties during the employment recruitment and application process. The Company will implement and maintain measures to ensure, to the extent practicable, that Personal Information in the Company’s possession, custody, or control is adequate, relevant, not excessive, and used for the limited purposes for which it was collected. The Company does not use automated means to make employment hiring decisions.

If a job applicant does not provide the Company with the Personal Information we requested and that is necessary for the Company to consider an employment application (e.g., evidence of qualifications or work history), then the Company will not be able to process the employment application and shall not be held liable for any results related thereto.

Collection of Personal Information and Sensitive Personal Information

The Company may collect Personal Information from you (i.e., the candidate), our recruitment vendors, background and credit check providers, public agencies responsible for assisting in the employment eligibility and verification process, publicly available sources, and your identified references. The Company may collect and process the following categories of Personal Information about you:

- Contact information, such as your name, residential or postal address, telephone number, and personal email address.
- The information in your curriculum vitae (“CV”), resume, cover letter, or similar documentation, or information otherwise obtained during the course of your interview or other engagement with us.
- Details regarding the type of employment sought, willingness to relocate, and job, compensation, and benefits preferences.
- Information related to your education, background, criminal record, credit history and similar data.
- Data provided by you (including from your publicly available social media accounts), your references, or other third parties related to your employment and professional history, skills, or qualifications.
- Information related to previous applications to the Company, or previous employment history with the Company.
- Potentially “sensitive data” about you or others, including Personal Information about your race, ethnicity, national origin, and health, such as any medical condition or disabilities you may have.

Website Privacy Policy

For information regarding how the Company collects data on our website or our other online services, including if you submit your application online, or during any other engagement with us, please see our website terms of use at <https://www.rpminc.com/terms-of-use/> and our privacy policy at <https://www.rpminc.com/privacy-policy>.

Online Monitoring. Please be aware that the Company uses cookies and other tracking technologies on our websites to monitor and record any and all activities and communications to, from, and on the website in order to safeguard, improve, and analyze usage of the website, and for the other purposes listed in our website privacy policy. You have the ability to manage some of the types of information gathered about you by opening the Cookie Preference Center on our Site. For the avoidance of doubt, you hereby acknowledge, agree, and consent to the monitoring and recording of all such activities and communications on our websites.

How the Company Uses Personal Information

The Company uses your Personal Information, as applicable law permits or requires, to satisfy our employment application and recruitment process, or for our other legitimate business interests. For example, the Company may use Personal Information for the following purposes:

- Identifying and evaluating job applicants, including assessing skills, qualifications, and interests.
- Verifying your information and completing employment, background and reference checks, which may be subject to your consent where required by applicable law.
- Communicating with you about the recruitment process and your application.
- Complying with our legal, judicial, regulatory, administrative, or other corporate requirements, including requirements mandating that we conduct criminal record, employment eligibility, immigration, and other background checks.

- Analyzing and improving our application and recruitment process.
- Accommodating individuals who may have specialized needs during the employment process.
- Protecting the rights, interests, and property of the Company, other applicants, employees, or the public, as required, or permitted, by law.

The Company will only use your Personal Information in accordance with this Notice, and if we need to use your Personal Information for an unrelated purpose, we will, to the extent practicable, provide notice to you and, if required by law, seek your consent. The Company may use your Personal Information without your consent, where permitted by applicable law or regulation. The Company will only use and process sensitive data (as described above) if permitted or required by law, and the Company will seek your consent to use such sensitive data, if consent is required as a matter of law.

Data Sharing

The Company will disclose your Personal Information to appropriate individuals within the Company, including to any affiliate company, who are involved in the employment application and recruitment process. The Company may also disclose your Personal Information to our designated agents, or third-party service providers, who require such information to assist the Company with conducting our routine business needs and administering our employment application and recruitment process, such as obtaining employment verification and background checks. The Company will share your Personal Information with third parties when required to do so by law, or by regulatory requirements to which you, or we, are subject. The Company may share Personal Information where it is necessary to administer our working relationship with you, or where we have another legitimate business interest in doing so, such as where it is necessary for the operation of our business or to defend our business or legal interests.

The Company may also share your Personal Information with potential acquirers of the Company. In particular, we may share your Personal Information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some, or all, of the Company's practice or assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company, in any form or format, is among the assets transferred.

Data Location and Retention

The Company is headquartered in the United States and has locations across the globe. The information (including Personal Information) that the Company collects and processes is stored in the United States and other jurisdictions in which the Company, or our service providers, operate. The United States and such jurisdictions may not provide the same level of protections as the laws in your country of residence and when transferred to the United States or elsewhere, your Personal Information may be accessible by, or otherwise made available to, local government authorities and officials pursuant to judicial and/or administrative orders, decrees, and demands, and/or other domestic laws, statutes, and regulations. The Company has implemented commercially reasonable technical, administrative, and physical security measures to safeguard Personal Information from any unauthorized use, disclosure, or access. By continuing to provide the Company with any data (including Personal Information) you hereby consent to such data (including Personal Information) being transferred to, and stored in, the United States or other jurisdictions in which the Company or our service providers operate. The Company retains applicant records in accordance with industry standards and as long as needed to defend our legal and business interests, which vary by jurisdiction.

Data Protection Rights

Depending on the jurisdiction in which you reside, or where the Company conducts its data processing activities, you may be afforded additional rights or privileges under certain applicable data protection laws. Schedule 1 sets forth additional data protection rights or privileges that may apply to you.

Disclaimer

With regard to any Personal Information that you provide the Company, regardless of whether that Personal Information relates to you or a third-party, you must ensure, on a continuing basis during your engagement with the Company, that (i) such Personal Information is accurate, relevant, and complete, (ii) you have the lawful basis to provide the Company with such Personal Information, and (iii) you have provided this Notice to, and/or received, consent from, any third-party whose Personal Information you have provided the Company. If you choose not to provide the Company with the Personal Information identified herein, then the Company may not be able to satisfy our own contractual or legal obligations, and in such circumstances, employment with the Company may not be permissible. You acknowledge and agree that the Company shall not be held liable for any consequence directly resulting from these circumstances.

This Notice does not form part of any contract of employment or other agreement to provide services or impose any independent obligation on the Company to proceed with any business transaction or agreement, it and does not create any employment or professional relationship between you and the Company.

Contact

If you have questions, concerns, or comments related to how the Company processes your Personal Information, including whether you would like to exercise the rights and privileges described herein, please contact the Company at dataprotection@rpminc.com or otherwise in accordance with the instructions set forth in our website privacy policy: <https://www.rpminc.com/privacy-policy>.

Amendment Date: This Notice was last amended on January 1, 2023.

SCHEDULE 1
JURISDICTION SPECIFIC DATA PROTECTION RIGHTS

If your Personal Information is subject to, or afforded protection under, any of the following data protection laws, then you are entitled to receive notice of the following:

Canada

Based on certain data protection laws in Canada, applicants in some Canadian jurisdictions may have a right to be informed of the collection of their Personal Information and provide their consent prior to such collection. They may also have a right to access and request that the Company update or correct the Personal Information in its custody or control, subject to limited exceptions prescribed by law, and a right to file a complaint with a Canadian provincial privacy commissioner's office. The Company is headquartered in the United States and has offices and locations in several countries and jurisdictions. Applicants residing in Canada are hereby informed that Personal Information collected from them may be available to government authorities under lawful orders and laws applicable in foreign jurisdictions (including the United States). For more information regarding Canada's provincial and territorial privacy laws as well as who is responsible for their enforcement, please see the following: <https://www.priv.gc.ca/en/about-the-opc/what-we-do/provincial-and-territorial-collaboration/provincial-and-territorial-privacy-laws-and-oversight/>.

European Economic Area and the United Kingdom

This notice provides additional information for applicants in the European Economic Area (EEA) and the United Kingdom (UK). Such applicants in the EEA and UK have the following privacy rights, as specified under EU and UK law, including the General Data Protection Regulations (GDPR) and UK Data Protection Act 2018:

- The right of access: You have the right to obtain from the Company confirmation as to whether or not Personal Information concerning you is being processed, and, where that is the case, access to (including by obtaining a copy of) such Personal Information and the manner in which, and the purposes for which we process your Personal Information, so that you can verify its accuracy and the lawfulness of the processing.
- The right to rectification: You have the right to obtain from the Company the rectification of inaccurate Personal Information concerning you, and the right to have incomplete Personal Information completed, including by means of providing a supplementary statement.
- The right to erasure: You have the right to obtain from us the erasure of your Personal Information where (i) your Personal Information is no longer necessary for the purpose for which it was collected/processed; (ii) you wish to withdraw your consent to processing (except where we have another legal ground for the processing that we may rely on); (iii) where processing is based on our legitimate interests and there are no overriding legitimate grounds for processing; (iv) where your Personal Information has been unlawfully processed, and (v) the Personal Information has to be erased for compliance with an applicable legal obligation.
- The right to restriction of processing: You have the right to obtain from us the restriction of processing of your Personal Information where (i) the accuracy of such Personal Information is contested by you (for such period as will enable us to verify the accuracy of your Personal Information); (ii) the processing of your Personal Information is unlawful, but you do object to the deletion of such data and request restriction of its use instead; (iii) you consider that we no longer need your Personal Information for the purposes of the processing, but require such Personal Information for the establishment, exercise or defense of legal claims; (iv) you have objected to the processing of your Personal Information on grounds of "legitimate interest," pending verification by us on whether our legitimate grounds override your own.
- The right to objection: You have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Information, which is based on our legitimate interests, including profiling based on those provisions. We shall no longer process the Personal Information, unless and to the extent in which we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. You may object to the processing of your Personal Information or direct marketing purposes at any time, without giving reason.
- The right to data portability: You have the right (subject to certain prerequisites and conditions) to receive Personal Information concerning you, and which you have provided to us, in a structured, commonly used and machine-readable format, and to transmit such data to another data controller.
- Withdrawing Consent. You also may withdraw your consent at any time if we are solely relying on your consent for the processing of your Personal Information. However, this will not impact our legal basis to process such Personal Information prior to the withdrawal of your consent.
- Automated Decision Making. The Company does not engage in any activity that subjects you to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significant results, impacting you.

Legal Basis for Processing: The Company processes Personal Information in accordance with the law. For example, our processing of Personal Information (as described in this Notice) is justified based on the following statutory provisions, which are not mutually exclusive: (i) processing may be based on consent (e.g., you voluntarily apply for an employment position); (ii) processing may be necessary for our legitimate interests as set forth herein (e.g., undertaking qualification and background assessment); (iii) processing may be necessary for the performance of, or preparation for, a contract to which you and we are a party (e.g., satisfying our pre-employment background requirements); and, (iv) processing may be required to comply with a legal or statutory obligations (e.g., data retention concerning job applicants who file complaints). For the avoidance of doubt, any and all applicants that submit an employment application to the Company hereby consent to the

Company's data processing of any Personal Information therein; in the event that an applicant withdraws his/her consent to such data processing, the Company may still collect, retain, and use such Personal Information in accordance with its legitimate business interests and legal and regulatory requirements.

To file a complaint, or raise concerns about, our data processing activities, please contact the Company at dataprotection@rpminc.com or otherwise in accordance with the instruction set forth in our website privacy policy: <https://www.rpminc.com/about-rpm/privacy-policy/>. You also have the right to file a complaint with the [supervisory authority in the EEA](#), and, if you are in the UK, you can file a complaint with the [Information Commissioner's Office](#).

United States

The Notice, either alone or in conjunction with other Company policies and procedures, satisfies the Company's legal obligation to draft and/or provide notice with regard to how the Company collects, uses, safeguards, disposes, or otherwise processes social security numbers or similar data afforded protection under U.S. state law, including the following: Conn. Gen. Stat. Ann. § 42-471; 201 Mass. Code Regs. §§ 17.01 – 17.04; Mich. CL § 445.84; New Mex. SA 1978, §§ 57-12b-1 – 57-12b-4; N.Y. Gen. Bus. Law § 399-ddd; and, Tex. Bus. & Com. Code Ann. § 501.052.

California

Data Privacy Rights. Pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), California residents are entitled to certain data privacy rights:

- Right to Know (Specific Pieces of Personal Information). You have the right to know the specific pieces of your personal information that we have collected about you.
- Right to Know (Categories of Personal Information). You have the right to know (i) the categories of personal information we have collected from you; (ii) the categories of sources from which the personal information is collected; (iii) the categories of your personal information we have sold or disclosed for a business purpose; (iv) the categories of third parties to whom your personal information was sold or disclosed for a business purpose; and (v) the business or commercial purpose for collecting or selling your personal information.
- Right to Delete. You have the right to request that we delete your personal information that we have collected and retain.
- Right to Correct. You have the right to request that we correct inaccurate personal information that we have collected and retain.
- Nondiscrimination. You have the right not to be subject to discrimination for asserting your rights under the CCPA.

Submit a Privacy Request. To submit a privacy request, you may contact us using any of the following means: (email) dataprotection@rpminc.com, (webform) <https://www.rpminc.com/contact-rpm/>, (telephone) 1 (800) 776-4488, or (mail) RPM International Inc., ATTN: Privacy Request, 2628 Pearl Road, Medina, OH 44256. If you would prefer, you may designate an authorized agent to submit a CCPA privacy request on your behalf. An authorized agent must be registered with the California Secretary of State to conduct business in California.

Privacy Request Verification Process. If you (or your authorized agent) make any request related to your personal information, the Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, the Company will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email, request certain contact information or government identifiers, and we will match at least two pieces of such personal information with data that we have previously collected from you before granting you access to, erasing, or correcting, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney pursuant to California Probate Code §§ 4121 to 4130. None of the CCPA's rights are absolute, and such rights are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA, please see: <https://oag.ca.gov/privacy/ccpa>.

Opt-Out Rights / Do Not Sell My Personal Information. California residents have the right to opt out of the "sale" of their personal information. However, the Company does not sell your personal information to third parties for profit or monetary or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities).

Opt-Out Rights / Do Not Share My Personal Information. California residents have the right to opt out of the "sharing" of their personal information. Except as otherwise provided on our publicly facing website, the Company does not "share" personal information. Please see our website Privacy Policy <https://www.rpminc.com/privacy-policy> for instructions on how to opt-out of the sharing of personal information.

Limit Use of Sensitive Personal Information. The Company does not use or disclose sensitive personal information for reasons other than those set forth in the CCPA, and therefore we do not provide individuals with the ability to limit how we use or disclose such sensitive personal information.