

CENERGY INTERNATIONAL SERVICES, INC.

(including all subsidiary entities)

PRIVACY POLICY

Notice and Application

Cenergy International Services, Inc. (“Cenergy”, “we”, “us”, or “our”) is committed to protecting and respecting privacy, including an individual’s personal information and data (“PID”). Cenergy has developed this policy statement (“Privacy Policy”) to assist in the understanding of our collection of PID and to explain how we may use and disclose PID in the course of our business operations.

In certain situations, Cenergy may provide additional data privacy notices specific to certain services, products, practices, and geographical regions. Those additional terms are to be read and applied in combination with this Privacy Policy.

This Privacy Policy does not form any contract of employment or any contract to provide services.

Scope

This Privacy Policy applies to PID collected by Cenergy both online and offline. Cenergy may collect PID through websites, email addresses, digital systems, and other electronic means that Cenergy may own or control. Additionally, we may also link to and receive PID from third-party sites. This Privacy Policy does not include or apply to PID collected on third-party sites, and individuals are responsible for reviewing the privacy statements and policies on those sites.

Collection and Use of PID

From access through websites to telephone conversations to in-person interactions, Cenergy may collect and use PID in many different ways. PID may be provided directly to us by individuals, automatically collected, and obtained from other sources or third parties. PID includes, but is not limited to:

- identifying information (such as name, titles, date of birth, citizenship, Social Security number, national insurance number, driver’s license, work visa, marital and dependent status, government issued IDs, username and password, etc.)
- contact information (such as phone number, email address, third party website URLs, postal address, emergency contacts, personal references, etc.);
- security credentials, online and/or social media identifiers;
- employment-related information (such as resume, curriculum vitae, employment history, experience overviews, awards, education, work-related/professional skills, language proficiencies, qualifications, security clearance information, professional and/or trade union membership, disciplinary information/grievances, emergency contacts, etc.);
- education information (such as education history, transcripts, certifications, licenses, etc.);

- job application information (such as cover letter, application forms, responses to screening questions, preferences, desired work locations, desired compensation, career interests, hobbies, personal assessments, interview notes, references, etc.);
- financial/transactional information (such as bank account numbers, tax numbers, tax-related elections, benefits elections, etc.);
- voluntarily provided demographic information (such as race, national or ethnic origin, gender/sexual orientation, religious beliefs, disability status, veteran status, etc.);
- physical geographic location information;
- computer and electronic network information (such as IP addresses, browser and operating system details, time zone settings, actions taken on all websites or digital systems including any Cenergy system, etc.);
- visual, audio or similar information (such as photographs, security camera images, video interviews, phone interviews, etc.);
- health-related information (as required by applicable law);
- drug and alcohol test results (as required by applicable law);
- criminal and other background checks (as required by applicable law);
- all other provided PID.

Certain visitors to Cenergy's websites choose to interact with Cenergy in ways that require Cenergy to gather personally identifying information. The amount and type of information that Cenergy gathers depends on the nature of the interaction. For example, Cenergy asks visitors who sign up at <https://www.cenergyintl.com/> to provide a username and email address. Those visitors who engage in transactions with Cenergy are asked to provide additional information, including as necessary the personal and financial information required to process those transactions. In each case, Cenergy collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Cenergy.

Use of PID

Cenergy uses PID only for legitimate business purposes and where permitted by applicable law. Specific uses include, but are not limited to:

- recruiting, hiring, and terminating (such as contact and evaluation of candidates for current and future job positions);
- creating and managing online accounts (for our websites and other digital systems);
- processing payments (if applicable);
- managing our client/customer, business partner, and vendor/supplier relationships;
- communicating promotional materials and alerts (as permitted by applicable law);
- communicating special events, programs, offers, and research (as permitted by applicable law);
- responding to governmental and other legal inquiries and claims;
- operating, evaluating, and enhancing our business (such as improving/developing services, performing data analytics, performing internal business functions [health and safety, audits, financial reviews, etc.], enhancing the security of our network and information systems, etc.);
- identifying, protecting against, and working to help prevent fraud and other unlawful activity;

- complying with and enforcing applicable laws and legal requirements, contract obligations (such as ensuring that wages and taxes are paid properly), industry standards, and internal policies and procedures.

Sharing and Disclosure of PID

From time to time, we may share and disclose PID in the following circumstances:

- Clients and Prospective Employers - With direction and permission, Cenergy may share and disclose PID to a client or prospective employer in connection with a job assignment or position.
- Service Providers – Service providers assist us in conducting our business. Such service providers include, but are not limited to, consultants and vendors that provide information technology services, marketing services, human resources services, and other business services. These service providers may have access to PID but only to the extent necessary to perform their respective functions or to comply with a legal requirement. Cenergy requires and expects all service providers to abide by the requirements of this Privacy Policy and all applicable laws and regulations.
- Compliance with Laws, Governmental Action, and Law Enforcement – We may share and disclose PID where legally required to do so. This includes complying with any applicable law, regulation, rule, court order, subpoena, legal process, governmental request, or national security and/or law enforcement requirement.
- Vital Interests – Cenergy may share and disclose PID in order to investigate, prevent, or take action regarding illegal, unethical, or legally actionable conduct (including exchanging PID with other companies and organizations to protect against fraud and theft) or situations involving potential threats to the rights and safety of any individual or entity.
- Business Transfers and Corporate Reorganization - Moreover, we may also share and disclose PID with third parties who may be involved with Cenergy in a corporate merger, consolidation, or acquisition as well as any proceedings approved by a court of law or governmental agency.
- Within Cenergy – Cenergy may share and disclose PID to an affiliate or subsidiary company for use in accordance with this Privacy Policy.
- With Consent – We may share and disclose PID for other purposes with individual consent (Cenergy may share aggregate information provided the shared information does not personally identify an individual).

Please note and understand that any PID posted in a public area of our websites or other digital systems is visible and can even be collected and used by others. Cenergy is not responsible for the protection of such PID or for the way others may use the PID that is posted in the public areas of our websites or other digital systems.

Privacy Rights

Cenergy respects an individual's rights to access and control his or her information including PID. We comply with applicable data protection laws and regulations and will process all rights requests in compliance with those laws and regulations.

Individuals residing in California are given certain rights under California law regarding PID (please see Appendix A for additional information). These individual rights include:

- the right to be informed of the type and source of PID that may be collected;
- the right to be informed of the business or commercial purposes for which Cenergy may use, disclose, or transfer PID as well as the types of third parties with whom we may share the PID;
- the right to request access to and copy the PID that we may have collected over the previous twelve (12) months;
- the right to request that Cenergy delete the PID that we may have collected (subject to certain legal exceptions);
- the right to opt-out of any sale of PID (*Note: Cenergy does not sell PID to third parties*);
- the right to be free from discrimination for exercising one's privacy rights;
- the right to request certain information regarding the disclosure of PID that may occur to third parties for such third parties' direct marketing purposes (the California "Shine the Light" law).

Under the laws of some jurisdictions (such as the European Union, United Kingdom, and Switzerland), individuals may have specific rights regarding PID. Cenergy respects those rights and will comply with all applicable laws.

If an individual would like to exercise a legally valid privacy right, please send an email to privacy@cenergyintl.com; or write to Cenergy International Services, Inc., 9720 Cypresswood Drive, Suite 241, Houston, Texas 77070, Attention: Legal Department; or call 866-228-0286 (toll free) for further information and instruction.

Children's Privacy

Cenergy's business services are only intended or and available to individuals over the age of 18, and we do not knowingly collect any information, PID or otherwise, from individuals under the age of 18. If we discover or believe that an individual is under the age of 18, that individual's information, PID or otherwise will be deleted.

SMS & Mobile Data Privacy

Cenergy may collect mobile phone numbers and other contact details as part of user interaction, including for job alerts, transactional communications, or service notifications. *Cenergy does not share mobile opt-in data or consent with third parties, affiliates, or vendors for marketing or promotional purposes.* All mobile data collected is used solely for its intended purpose in compliance with applicable laws and industry standards (including the guidelines of the Cellular Telecommunications Industry Association, Telephone Consumer Protection Act, and 10-Digit Long Code). Users may opt out at any time by replying "STOP." Cenergy does not disclose personally identifying information other than as described below. Visitors can always refuse to supply personally identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.

Retention

Cenergy may retain PID where there is an ongoing business need to do so. When no ongoing business need exists, such PID will be either deleted or anonymized, or if this is not possible (such as when stored in backup archives), then the PID will be securely stored until deletion is possible.

Security

Cenergy has implemented commercially reasonable technical and organizational security measures to protect PID that is submitted to us and that is under our control against accidental loss, unauthorized access, misuse, disclosure, or alteration. However, please note and be aware that no method of data transmission or storage is 100% secure. While Cenergy strives to protect PID, we cannot guarantee the absolute security, integrity, and privacy of any or all information, including PID, and we make no warranty (express, implied, or otherwise) that we are able to prevent unauthorized access to or use of information including PID.

Response to PID Incident

If Cenergy discovers that PID has been involved in a security incident, appropriate action will be taken to respond to the incident in a timely manner, and notification of the incident will be provided where legally required.

International Transfer

Cenergy's websites and other digital systems are located in the United States. Should an individual access our websites or other digital systems from outside the United States, that individual understands and consents that all PID may be transferred to and maintained on computers and servers located in the United States. Furthermore, all individuals understand and consent that Cenergy may further transfer PID provided to us to other countries for various legitimate and legal purposes.

Use of Cookies and Computer-Related Information

Cenergy and some of our third-party service providers may use cookies, log-in files, beacons, tags and/or other similar data collecting or tracking techniques on websites, digital systems, mobile apps, and other electronic means for various legitimate and legal purposes. Some cookies may remain on computers even after leaving websites or digital systems. Cookies can be controlled and/or disabled at the browser level, however, doing so may limit the use of certain features on our websites and digital systems.

Reporting of Fraudulent Activities

Kindly report any potentially fraudulent activity discovered on our websites or other digital systems, or in an email or text from or involving Cenergy, to us at 866-228-0286 (toll free) or by writing to Cenergy International Services, Inc., 9720 Cypresswood Drive, Suite 241, Houston, Texas 77070, Attention Legal Department.

Content Changes

Cenergy may update this Privacy Policy at any time. Should we make any material changes, Cenergy will provide notice of such on our websites or by way of other means. We will also update the "Effective Date" on this Privacy Policy to indicate the date from which any changes take effect. Cenergy strongly encourages the periodic review of this Privacy Policy for the latest information on our privacy practices.

Contact Information

For more information regarding Cenergy's privacy practices, please contact us by email at privacy@cenergyintl.com or by mail at Cenergy International Services, Inc., 9720 Cypresswood Drive, Suite 241, Houston, Texas 77070, Attention: Legal Department.

APPENDIX A

California Privacy Statement

Residents of California have rights under the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act. Personal information and data (“PID”) categories under the California Customer Records Act, specifically Cal. Civ. Code § 1798.80 (e), include but are not limited to education or employment information (including job title and history), bank account numbers, debit or credit card numbers, health and medical information, health plans, insurance policies and numbers. Under applicable California law, such categories are in addition to:

- Personal Identifiers – including but not limited to names, physical addresses, telephone/cellphone numbers, email addresses, Social Security numbers, driver’s licenses, passports, government identifications numbers, or other similar identifiers.
- Non-Public Education Information – including but not limited to education records, student identification numbers, grades, transcripts, schedules, and course work.
- Professional and/or Employment-Related Information - including but not limited to current or past job histories, job titles, salary information, benefits information, job performance information, emergency contact information, and other information related to previous employment.
- Protected Classification Characteristics – including but not limited to age, race, national origin or citizenship, religion or creed, marital or relationship status, medical condition, physical or mental disability; veteran or military status, or sex and gender information.
- Other Information – including but not limited to all information that you or someone acting on your behalf may provide or which may be collected as required or permitted by applicable law.

California residents, subject to certain exceptions, have the following rights under CCPA:

- Right to Know – A resident has the right to request access to the PID that Cenergy has collected specifically regarding them (the resident making the request). This includes the right to request disclosure of the categories of PID, the categories of sources from which the PID is collected, the business purpose for collecting the PID, and the specific PID that Cenergy has collected regarding that specific individual. In response to such requests, Cenergy will provide appropriate categories or descriptions of the PID.
- Right to Correct – A resident has the right to review and, if factually inaccurate, request a correction to the PID that Cenergy maintains regarding them (the resident making the request). In accordance with applicable law, Cenergy will process such a request taking into account the nature of the PID and the purposes for processing such PID.
- Right to Delete – A resident has the right to request that Cenergy delete any PID regarding them (the resident making the request) that Cenergy has collected. Cenergy may decline to delete certain types of PID in accordance with applicable law.
- Right to Non-Discrimination – Cenergy will not discriminate or retaliate against a resident for exercising any of their privacy rights.

To exercise the privacy rights described above, a California resident may submit a request to exercise these rights through a written request to either privacy@cenergyintl.com or Cenergy International Services, Inc., 9720 Cypresswood Drive, Suite 241, Houston, Texas 77070, Attention: Legal Department, or by calling 866-228-0286 (toll free) for further information and instruction.

Cenergy does not “sell” or “share” a California resident’s PID, as those terms are defined by the CCPA. Additionally, Cenergy uses “sensitive personal information”, as defined in the CCPA and described above, only for reasonable, necessary, and proportionable business purposes. Furthermore, Cenergy only uses and discloses “sensitive personal information” as permitted by applicable law, including the CCPA, and Cenergy does not use or disclose “sensitive personal information” for purposes other than those specified in the applicable CCPA regulations including § 7027 (m).