CANDIDATE AND EMPLOYEE DATA PRIVACY NOTICE

Version 16 October 2026

1. INTRODUCTION

1.1. In this Candidate and Employee Data Privacy Notice, the terms "**Rheem Group**", **"we"**, **"us"** and **"our"** are references to Rheem Manufacturing Company, 1100 Abernathy Road, Suite 1700 Atlanta, GA 30328 (individually: "**Rheem Manufacturing Company (US)**"), and Rheem affiliated companies (including our local subsidiaries, for this version in particular **De Jong Slovakia, s. r. o., with registered office: Priemyselná 16238, 080 06 Prešov, Slovak Republic, company ID: 55 913 024, registered in the Commercial Register of the District Court Prešov, section: Sro, insert number: 53823/P**, hereinafter: "**Rheem Affiliates**"), each in principle acting independently as a controller in its own right. For some HR purposes indicated in this Candidate and Employee Data Privacy Notice Rheem and Rheem Affiliates can be considered joint controllers of your personal data.

1.2. We want to inform you about how we collect, use, and disclose personal data about you before, during and after your working relationship with us.

1.3. We are separate controllers for the processing of personal data about current and former employees, workers, individual contractors, contingent workers, applicants, interview candidates, interns, agency workers, consultants, directors, members (**"staff"** or **"you"** or **"your"**), and third parties whose information you provide to us in connection with the employment or other working relationship (e.g. next-of-kin, emergency contact information and/or dependents). Where we refer to 'employment' or 'engagement' in this notice, we do so for convenience only, and this should in no way be interpreted as purporting to confer employment status on non-employees to whom this Candidate and Employee Data Privacy Notice also applies above. This Candidate and Employee Data Privacy Notice does not form part of any of our staff terms and conditions of employment or engagement, does not confer any employment status on you and does not confer any contractual right on you or place any contractual obligation on us.

1.4. We take your data protection rights and our legal obligations seriously and will endeavour to ensure that our processing of data complies with applicable law and regulations. We take precautions to maintain the security, confidentiality, and integrity of the personal data we process about you. Your data will only be processed as set out below unless we provide you with written notice otherwise and/or we have where required obtained your explicit permission. It is important that you read this notice, together with any privacy notice we may provide on specific occasions when we are collecting or processing your personal data, so that you are aware of how and why we are using such information.

2. CONTACT

2.1. Our contact details are as follows:

(i) HR Department De Jong Slovakia, s. r. o., Attention: HR Manager, Priemyselná 16238, 080 06 Prešov, Slovak Republic, email: osobneudaje@dejongslovakia.com and/or

(ii) Rheem's Compliance Manager, Attention: Office of General Counsel, 1100 Abernathy Rd NE #1700, Atlanta, Georgia 30328, Email: compliancemanager@rheem.com

Copies (CC) within the email should continue to be sent to the Rheem Europe Legal Department: privacy@djg.com.

2.2. If you have any questions regarding the processing of your personal data, if you would like to exercise any of your below rights, or if you believe your privacy rights have been violated, please contact osobneudaje@dejongslovakia.com or compliancemanager@rheem.com.

3. PROCESSING OF PERSONAL DATA

3.1. We collect and process your personal data (sometimes referred to as personal information by applicable privacy law) for the purposes described in this Candidate and Employee Data Privacy Notice. As set out in our Directive on the Personal Data Processing, personal data means any information describing or relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or

indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

4. WHAT DATA DO WE PROCESS?

4.1. We collect various types of personal data about you for the purposes described in this Candidate and Employee Data Privacy Notice including:

(a) **personal details** such as your title, name, surname, birth name, preferred name, any additional names, gender, citizenship, nationality, date of birth, birth number and home contact details (e.g. address of permanent and temporary residence, telephone or mobile number, e-mail address), national ID number, and eligibility to work information;

(b) **recruitment and selection data** such as skills and experience, qualifications, references, CV and application;

(c) **data related to your engagement** such as employment contract or contract for the performance of the function of an executive director, work contact details (e.g. corporate address, company telephone number and e-mail), employee or payroll number and photograph; driver's licence information and copy of driving licence or other proof of identity, and information used to populate employee biographies, if necessary for the performance of your job position;

(d) **remuneration and benefits data** such as information about your remuneration (including salary/hourly wage rate/contractual remuneration/allowances, if applicable, additional payments (wage benefits and wage compensation), overtime, on-call time, bonuses and commission schemes), holiday/absence payments (e.g. holiday pay, sick pay, parental allowance, other employee-related work obstacles) and bank account details;

(e) **leave data** such as attendance records, records and reasons for absences, and holiday data;

(f) **absence management data** such as absence history, fit notes and details of incapacity and all documents necessary to comply with our legal obligation to report absenteeism and absence;

(g) **flexible working procedure data** such as requests, consideration and correspondence;

(h) **performance management data** such as colleague and manager feedback, performance information and history, development programs planned/attended, e-learning programs, performance and development reviews, feedback, disciplinary and grievance information;

(i) **training and development data** such as data relating to training and development needs, attendance at training or recordings used for training purposes and diplomas and certificates of educational courses and/or training programs;

(j) **disciplinary and grievance data** such as allegations and complaints;

(k) **health and safety data** such as health and safety audits and health and safety screening and assessment requests and results and information relating to accommodations;

(l) **monitoring data** such as closed circuit television footage and system and building login and access records;

(m) **employee claims, complaints and disclosures information** such as subject matter of employment or contract based litigation and complaints; and

(n) **data related to (your use of) our IT-systems** such as data you enter into the IT-systems and logging data, CCTV footage and other information obtained through electronic means such as swipe card records, fingerprints, information about your use of our information and communications systems, information required to access company systems and applications, and electronic content produced by you using our systems.

5. HOW DO WE COLLECT DATA?

5.1. We collect and record your personal data from a variety of sources, but mainly directly from you. You will usually provide this information directly to your managers or local Human Resources contact or enter it into our systems. In addition, further information about you will come from your managers or Human Resources or occasionally your colleagues.

5.2. We also obtain some information from third parties: for example, references from a previous employer, resume details from a recruitment agency, items you post on job sites like LinkedIn, and certain information from the company medical officer, working conditions service and benefit providers, and occasionally from our customers or suppliers.

5.3. In some circumstances, data will be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, CCTV, telephone logs and recordings, instant message logs and email and Internet access logs), if and to the extent permitted by applicable laws.

5.4. Where we ask you to provide personal data to us on a mandatory basis, we will inform you of this at the time of collection and in the event that particular information is required by the contract with you or by statute this will be indicated. Failure to provide any mandatory information will mean that we cannot carry out certain HR processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases it may mean that we are unable to continue with your employment or engagement if we do not have the personal data we believe to be necessary for the effective and efficient administration and management of our relationship with you.

6. PURPOSES AND LEGAL BASES FOR PROCESSING

6.1. Whenever we process your personal data we do so for specific purposes and on the basis of one or more of the lawful conditions for processing. The table below shows the purposes for which we process your personal data and the lawful condition(s) on which we do so. Where we rely on legitimate interest as the legal condition for processing, the schedule below indicates the specific interest for which your personal data is processed. Where we rely on our legitimate interest, you may the right to object in certain circumstances as indicated in paragraph 13. In certain jurisdictions, we may only process your personal data with your consent, which shall be obtained in a manner consistent with applicable laws.

Purpose	**Lawful condition(s)**
Recruitment and selection.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to recruit and select new staff.
Training, development, promotion, talent review, career and succession planning and business contingency planning.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to offer you career guidance and development, mobility and succession planning and to make sure we have the right people in the right place.
Providing and administering remuneration, benefits and incentive schemes and reimbursement of business costs and expenses and making appropriate tax and social security deductions and contributions.	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract and to fulfil our legal obligations.
Allocating and managing duties and responsibilities and the business activities to which they relate, including business travel.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to allocate and manage duties and responsibilities and the business activities to which they relate.
Managing and operating appraisal, conduct, performance, capability, absence and grievance related reviews, allegations, complaints, investigations and processes and other informal and formal HR processes and making related management decisions.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to conduct our HR processes and to make related management decisions.
Processing information about absence or medical information regarding physical or mental health or condition in order to: assess eligibility for incapacity or permanent disability related remuneration or benefits;	Processing will only be carried out if necessary for compliance with legal obligations to which we are subject.

determine fitness for work; facilitate a return to work; make adjustments or accommodations to duties or the workplace; make management decisions regarding employment or engagement or continued employment or engagement or redeployment; and conduct related management processes.	
For planning, managing and carrying out restructuring or redundancies or other change programmes including appropriate consultation, selection, alternative employment searches and related management decisions.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to conduct and manage restructuring and change programmes regarding staff.
Operating email, IT, internet, social media, HR related and other company policies and procedures. To the extent permitted by applicable laws, we carry out monitoring of our IT systems to protect and maintain the integrity of our IT systems and infrastructure; to ensure compliance with our IT policies and to locate information through searches where needed for a legitimate business purpose.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to operate and manage our IT facilities and your use of it.
Complying with applicable laws and regulation.	Processing is necessary for compliance with a legal obligation to which we are subject.
Where relevant for publishing appropriate internal or external communications or publicity material including via social media in appropriate circumstances.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to inform people inside and outside our company about different business related subjects. or You have given consent to the processing of your personal data for one or more specific purposes.
To operate the contract of employment or an executive engagement contract.	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract.
To enforce our legal rights and obligations, and for any purposes in connection with any legal claims made by, against or otherwise involving you.	Processing is necessary for the purposes of the following legitimate interests pursued by us: to be able to enforce our legal rights and to handle legal claims involving you.
To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, or regulatory authorities.	Processing is necessary for compliance with legal obligations to which we are subject.
Sharing your personal data with potential buyers of all or a substantial portion of our assets (i.e., a business or part of a business) in connection with the sale or transfer of those assets to potential buyers.	Processing is necessary to pursue our legitimate interests as further explained: Sale or transfer of company assets.
Documentation such as work permits, details of residency, proof of citizenship will be processed to assess and review eligibility to work for us in the jurisdiction in which you work.	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract. Processing is necessary for compliance with a legal obligation to which we are subject.

7. SPECIAL CATEGORIES OF DATA

7.1. Some of the personal data listed in this paragraph fall into special categories, sometimes called "*sensitive personal data*" or “sensitive personal information” under data protection laws, for example information relating to physical or mental health. We will process such personal data only in limited circumstances as permitted by the applicable data protection laws and as explained in further detail in this notice.

7.2. We occasionally process your special category personal data for specific purposes, including using such information in relation to:

(a) leaves of absence, which may include sickness absence, to comply with employment and other laws;

(b) your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments and to administer benefits;

(c) your national or ethnic origin or union membership to ensure meaningful equal opportunity monitoring and reporting and to comply with legal obligations relating to diversity and anti-discrimination;

(d) <not applicable in Slovac Republic>

(e) financial account information, such as bank account information for direct deposits of salary/bonusses; and/or

(f) legal claims where it is necessary to do so or where you have already made the information public.

(g) <not applicable in Slovak Republic>

7.3. Where we process special categories of data, it will be justified by a condition set out at paragraph 7.2 above and also by one of the following additional conditions:

(i) the processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or us in the field of employment law, social security and social protection law, to the extent permissible under applicable laws;

(ii) the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;

(iii) the processing is necessary to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency);

(iv) the processing is necessary for purposes authorised by applicable law.

(v) the processing is necessary for the establishment, exercise or defence of legal claims;

(vi) in exceptional circumstances the processing is carried out subject to your explicit consent (as explained below); and/or

(vii) as permitted under applicable data protection laws.

7.4. We will occasionally seek your consent to certain processing which is not otherwise justified under one of the above bases. However, in some jurisdictions, consent may be the only basis for processing special categories of data, in which case we shall ensure that we will only process such personal data upon obtaining your consent in a manner consistent with data protection laws. If consent is required for the processing in question, it will be sought from you separately to ensure that it is freely given, informed and explicit in accordance with applicable data protection laws. Information regarding such processing will be provided to you at the time that consent is requested, along with the impact of not providing any such consent. You should be aware that it is not a condition or requirement of your employment to agree to any request for consent from us.

7.5. We will only use your personal data for the purposes for which we obtained it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will where required by law notify you and we will explain the legal basis which allows us to do so.

8. <NOT APPLICABLE IN SLOVAK REPUBLIC>

9. PROCESSING DATA RELATING TO CRIMINAL CONVICTIONS AND OFFENCES

9.1. Personal data relating to criminal convictions and offences will only be processed where authorised by applicable laws. We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. Certain roles require a high degree of trust and integrity, for example when it involves dealing with significant sums of funds and so we would like to seek a basic disclosure of your criminal records history. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

10. RETENTION AND SECURITY OF PERSONAL DATA

10.1. We endeavour to ensure that personal data is kept as current as possible and that irrelevant or excessive data is deleted, aggregated or made anonymous as soon as reasonably practicable.

10.2. Our general approach is to only retain personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you. This will usually be the period of your employment/contract with us plus the length of any applicable statutory limitation period following your departure, although some data, such as pension information, may need to be kept for longer. We may keep some specific types of data, for example, tax records, for different periods of time, as required by applicable law. However, some personal data may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

10.3. In order to prevent unauthorised or accidental access, disclosure, alteration, loss or other use of your personal data, we have implemented various internal management policies (including physical, electronic and management measures) and various security technologies and procedures. For example:

(a) where required under applicable data protection laws and regulations, we will encrypt and/or anonymise your personal data;

(b) your personal data will only be accessed by our personnel on a “need-to-know” basis;

(c) we ensure that our personnel are regularly trained on data protection matters; and

(d) in order to mitigate any potential risks of unauthorised processing of your personal data, we maintain a security incident response plan. Where required by applicable regulations, we will also seek to inform you and the relevant authorities of any incidents concerning the personal data we process on your behalf.

11. INTERNATIONAL TRANSFER OF PERSONAL DATA

11.1. From time to time your personal data (including special categories of personal data) will be transferred to members of our affiliated companies and/or third parties including to service providers and other contractors we work with. These parties may be based in or process your personal data from countries or territories outside the European Ecomonic Area (EEA) or the UK which may not have equivalent data protection laws and may not be subject to an adequacy decision (as applicable) by the European Commission or the United Kingdom. They will process your personal data for the purposes described in this Candidate and Employee Data Privacy Notice. This will be applicable for example where the data is stored in a shared database with such a company. If permitted by applicable law, we may provide you with information about those third parties to whom we transfer personal data. If you require any such information, please contact us.

11.2. If such a transfer takes place we will, where required, conduct a data transfer risk assessment and ensure that appropriate or suitable safeguards are in place (such as the relevant standard contractual clauses, international data transfer agreement or addendum or other lawful and valid data transfer safeguard) to protect your personal data and to ensure the transfer is in compliance with applicable data protection laws. In some jurisdictions, we may also be required to satisfy other requirements as required by applicable law before we make such transfers. In such case, we shall only transfer data upon satisfying those requirements under applicable law.

11.3. For the transfer of your personal data to Rheem Manufacturing Company (US) and other Rheem Group companies located outside the EEA or the UK (other than transfers of personal data from Mainland China), we provide appropriate safeguards by using standard data protection clauses adopted by the European Commission and/or the UK, as applicable. These clauses are part of the intra-group data transfer agreement

we entered into with Rheem Manufacturing Company and Rheem Affiliates which regulates cross-border transfers of your personal data within the Rheem Group.

11.4. For the purposes as mentioned in paragraph 11.5. personal data may be transferred to Rheem Manufacturing Company (US) and to Rheem Affiliates located outside the EEA and the UK including:

(a) full name and information about your role (title, department, division, manager);

(b) corporate contact details (email address; telephone, mobile phone, address);

(c) personal data included on our IT systems and in relation to the use of corporate devices (such as IP addresses, browsing history, operating system, quarantined files); and

(d) information which is strictly necessary for the performance of centralized HR functions (for example performance related information).

11.5. We rely on an intra-group data transfer agreement or another adequate measure (where applicable) to ensure personal data of our EU and UK employees receives a sufficient level of protection throughout the Rheem Group. For example, your personal data will be shared with members of the Rheem Group in the U.S. for the following purposes:

(i) personal data will be shared with Rheem Manufacturing Company (US) for providing email security, cyber security and (only if we request it) additional IT support to us;

(ii) personal data will be shared with Rheem Group companies in the context of the Global Address Book and the Global Intranet Site hosted and maintained by Rheem Manufacturing Company (US);

(iii) your personal data will be shared with the Rheem Group companies you make contact with through MS Teams; and

(iv) your personal data will be shared with Rheem Manufacturing Company (US) for the purposes of the Rheem Group's Enterprise HR functions (including performance, talent, capability, absence and grievance related reviews, investigations and other formal HR and other management and administrative processes).

11.6. You have a right to request a copy of any data transfer agreement under which your personal data is transferred, or to otherwise have access to the safeguards used. Any data transfer agreement made available to you may be redacted for reasons of commercial sensitivity.

12. DISCLOSURES OF PERSONAL DATA

12.1. Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out performance related procedures will have access to your data which is relevant to their function.

12.2. Your personal data will be accessed by certain third parties when these provide us with services, such as hosting, supporting and maintaining our time-recording system, payroll processing system and other HR information systems.

12.3. Furthermore your personal data may be shared with third parties such as tax authorities, our insurers, lawyers, consultants and other professional advisors and payroll providers.

12.4. Where these third parties process your personal data on behalf of us (such as hosting and payroll providers) they carry out their tasks solely upon our instructions for the above mentioned purposes. To achieve this we enter into data processing agreements with these parties. If they are receiving as separate controllers of your personal data then as with other data processing we establish a relevant legal basis for that disclosure under the relevant data protection law. For example, the disclosure to lawyers would be to obtain legal advice and defend against claims or assert legal rights.

12.5. In addition, we may provide personal data to national authorities/institutions (e.g. Social Insurance Agency, tax office) in order to comply with legal obligations to which we are subject.

12.6. We will not sell your personal information or share it for any cross-contextual advertising purposes.

13. YOUR RIGHTS AS A DATA SUBJECT

13.1. Depending on your residence, you (or your next of kin, if applicable under applicable law) may have certain rights in relation to any personal data about you which we hold. Please note, you may not have access to all of these rights, depending on your residency, and only those relevant in your jurisdiction may apply. We may choose to offer these rights to you even if we are not required to under applicable law.

13.2. Right to access, correct and delete your personal data.
We aim to ensure that all personal data are correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address and bank accounts) are notified to us so that we can ensure that your data is up-to-date.

13.2.1. You have the right to request access to:

(a) the categories of personal data that we have collected about you;

(b) the categories of sources from which we have collected personal information about you;

(c) the business or commercial purpose for collecting or sharing personal information about you;

(d) the categories of third parties to whom we disclose your personal information; and

(e) the specific pieces of personal information we have collected about you.

13.2.2. You have the right to request correction of any inaccurate data relating to you that we have.

13.2.3. You have the right to request deletion of your personal information, subject to certain limitations. For example, we cannot delete your information that is necessary for your employment (e.g. your Social Security number or National Insurance number) or for us to comply with our legal obligations (e.g. taxation and auditing).

13.3. **Data portability**

You may have the right to receive all of the personal data which we have about you in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.

13.4. **Right to restriction of processing**

13.4.1. You have the right to restrict our processing of your personal data where:

(a) you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;

(b) where the processing is unlawful but you do not want us to erase the data;

(c) where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or

(d) where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether we have compelling legitimate grounds to continue processing.

13.4.2. Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

13.5. **Right to withdraw consent**

Where we have relied on your consent to process particular information and you have provided us with your consent to process data, you have the right to withdraw such consent at any time. You can do this by:

(a) in some cases deleting the relevant data from the relevant HR system (although note that in this case it may remain in back-ups and linked systems until it is deleted in accordance with our data retention policy); or

(b) contacting your local Human Resources contact.

13.6. <not applicable in Slovak Republic>

13.7. **Right to object to processing justified on legitimate interest grounds**

Where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

13.8. **Right to complain**

You also have the right to lodge a complaint with a supervisory authority or a competent authority if you consider that the processing of your personal data infringes applicable law.

14. EXERCISING YOUR DATA RIGHTS

14.1. To exercise your data rights, please contact the persons referenced under section 2 of this Notice.

14.2. <not applicable in Slovak Republic>

14.3. <not applicable in Slovak Republic>

14.4. We will not discriminate against you in any way for exercising your rights.

14.5. Applicable national legislation may define exceptions and limitations to exercise your rights. For example when processing your data is necessary and proportionate in pursuing legal actions or in defence of claims.

15. CHILDREN AND MINORS.

15.1. We do not knowingly employ or collect personal information directly from individuals under 15 years of age.

16. ADDITIONAL DATA PRIVACY NOTICES

16.1. We may undertake certain processing of personal data which are subject to additional Data Privacy Notices and we shall bring these to your attention where they engage.

17. NOTICE OF CHANGES

17.1. We may change or update this Candidate and Employee Data Privacy Notice at any time if the processing of your personal data changes. Should that happen, you will be informed of these changes or made aware that we have updated the Candidate and Employee Data Privacy Notice. If applicable data privacy laws require us to seek your consent before making such changes, we shall ensure that we will seek your consent accordingly.

17.2. This Candidate and Employee Data Privacy Notice was last updated and reviewed on 02 October 2026.