

Employee Privacy Policy

In this age of the Internet where privacy has become an increasing concern, we take your privacy very seriously. The privacy and security of your personal data (the “Personal Information”) which we collect from you is important to us. It is equally important that you understand how we handle this data.

By accepting employment with DMS Drywall & Interior Systems Inc, DMS-BKL Drywall & Interior Systems Inc, or DMS Management Group (the “Company”) you expressly acknowledge that you have read, understand and agree to all of the terms of this Privacy Policy as outlined below and as it may be modified by us from time to time with or without prior notice.

Collection of Information

In the course of conducting our business and complying with federal, state, and local government regulations governing such matters as employment, tax, insurance, etc., we must collect Personal Information from you. The nature of the Information collected varies somewhat for each employee, depending on your employment responsibilities, your citizenship, the location of the facility where you work, and other factors. We collect Personal Information from you solely for business purposes, including those related directly to your employment with the Company, and those required by governmental agencies.

Data collected may include, without limitation, such things as:

- Your name
- User ID(s)
- Phone numbers
- Email address (es)
- Mailing addresses
- Banking and other financial data
- Government identification numbers, e.g., Social Security number, driver’s license number
- Date of birth
- Gender, race, and ethnicity
- Health and disability data
- Family-related data, e.g., marital status,
- Personal and health -related data for you and your family
- Trade union data

Anyone who sends unsolicited to the Company by any means, e.g., mail, email, fax, expressly consents to the storage, destruction, processing, or disclosure of the data, as well as any other reasonable business-related use by the Company or any government agency of the unsolicited data.

We do monitor employee use of the Internet in order to detect access to inappropriate websites or other misuse of the Company’s computer network. We also use email filters to block spam and computer viruses. These filters may from time to time block legitimate email messages.

The Company will not knowingly collect or use Personal Data in any manner not consistent with this Policy, as it may be amended from time to time, and applicable laws.

Because the Personal Information collected by the Company is necessary for business purposes, you are required to provide it. Your refusal or failure to provide the requested Personal Information may, therefore, disqualify you from employment with the Company or from receipt or enjoyment of certain Company benefits.

Use of the Information We Collect

The primary purposes for collection, storage and/or use of your Personal Information include, but are not limited to:

- **Human Resources Management.** We collect, store, analyze, and share (internally) Personal Information in order to attract, retain and motivate a highly qualified workforce. This includes recruiting, compensation planning, succession planning, reorganization needs, performance assessment, training, employee benefit administration, compliance with applicable legal requirements, and communication with employees and/or their representatives.
- **Business Processes and Management.** Personal Information is used to run our business operations including, for example, scheduling work assignments, managing company assets, reporting and/releasing public data (e.g., Annual Reports, etc.); and populating employee directories. Information may also be used to comply with government regulation.
- **Safety and Security Management.** We use such Information as appropriate to ensure the safety and protection of employees, assets, resources, and communities.
- **Communication and Identification.** We use your Personal Information to identify you and to communicate with you.

Disclosure of Data

The Company acts to protect your Personal Information and ensure that unauthorized individuals do not have access to your Information by using security measures to protect Personal Information. We will not knowingly disclose, sell or otherwise distribute your Personal Information to any third party without your knowledge and, where appropriate, your express written permission, except under the following circumstances.

- **Legal requests and investigations.** We may disclose your Personal Information when such disclosure is reasonably necessary (i) to prevent fraud; (ii) to comply with any applicable statute, law, rule or regulation; or (iii) to comply with a court order.
- **Third-party vendors and service providers.** We may, from time to time, outsource services, functions, or operations of our business to third -party service providers. When engaging in such outsourcing, it may be necessary for us to disclose your Personal Information to those service providers, e.g., a payroll service, a benefits provider. In some cases, the service providers may collect Personal Information directly from you on our behalf. We will work with any such providers to restrict how the providers may access, use and disclose your Information.
- **Business Transfers:** During the term of your employment we may buy other companies, create new subsidiaries or business units or sell part or all of the Company or its assets. It is likely that some or all of your Personal Information will be transferred to another company as

part of any such the transaction. However, your Personal Information will remain subject to protection outlined in the then current Privacy Policy.

- **Protection of Company and Other.** We may release Personal Information when we believe release is necessary to comply with the law; enforce or apply our policies and other agreements; or protect the rights, property, or safety of Company, our employees, or others. This disclosure will never, however, include selling, renting, sharing or otherwise disclosing your Personal Information for commercial purposes in violation of the commitments set forth in this Privacy Policy.

Security of Your Personal Information

We employ reasonable security measures and technologies, such as password protection, encryption, physical locks, etc., to protect the confidentiality of your Personal Information. Only authorized employees have access to Personal Information. If you are an employee with such authorization it is imperative that you take the appropriate safeguards to protect such Information. Paper and other hard copy containing Personal Information (or any other confidential information) should be secured in a locked location when not in use. Computers and other access points should be secured when not in use by logging out or locking. Passwords and user ID's should be guarded and not shared. When no longer necessary for business purposes, paper and hard copies should be immediately destroyed using paper shredders or similar devices. Do not leave copies in unsecured locations waiting to be shredded or otherwise destroyed. Do not make or distribute unauthorized copies of documents or other tangible medium containing personal data. Electronic files containing Personal Information should only be stored on secure computers and not copied or otherwise shared with unauthorized individuals within or outside of Company.

The Company will make reasonable efforts to secure Personal Information stored or transmitted electronically secure from hackers or other persons who are not authorized to access such Information.

Compliance with this Privacy Policy is important to the Company. Any violation or potential violation of this Policy should be reported to the Director of Human Resources. The failure by any employee to follow these privacy policies may result in discipline up to and including discharge of the employee. Any questions or suggestions regarding this policy may also be directed to the Director of Human Resources.

Updating and Accessing Your Personal Data

You must promptly inform us when changes occur in the Personal Information you have provided so that we can maintain accurate Information about you by contacting Human Resources/Payroll Department. Although you may update or change your Information, we may maintain such Personal Information previously submitted in historical archives.