

US-LEG-01



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1. INTRODUCTION

The purpose of the California Consumer Privacy Policy/Notice at Collection is to establish guidelines for employees within Ontic including the Group companies set out in Annex 1.

At Ontic (referred to here as 'Ontic', 'we', 'us', 'our' etc.), dealing properly with information about people is crucial.

Whether you are an Ontic employee, a job applicant, or interacting with Ontic in some other capacity, your privacy is important to us. This California Consumer Privacy Policy/Notice explains how we collect, use, and disclose your personal information relating to California residents covered by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively the 'CCPA'). This 'Privacy/Notice' constitutes our privacy policy AND our 'notice at collection' pursuant to the CCPA. 'Notice at collection' is a notice that must be given to you at or before Ontic collects Personal Information from you that informs you of the categories of Personal Information that we may collect and the business purpose for collecting your Personal Information.

This privacy notice should be read in consort with Ontic's Global Privacy Policy (GP-LEG-22) that is available under the 'Resources' section of the Ontic website (http://www.ontic.com).

2. REVISIONS AND AMENDMENTS

Rev	Date	Reason for change	Revised by		
А	09 October 2023	Initial issue	Z. Rowe		
В	31 October 2024	Annual review	Z. Rowe		
С	07 November 2025	Annual review	Z. Rowe		
Next review due October 2026					



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3. SCOPE

This policy applies to the collection of Personal Information from persons who are California residents ("**Relevant Consumer**").

"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 (excluding information which is lawfully made available from federal, state, or local government records "Publicly Available"). Information is not "Publicly Available" if that data is used for a purpose that is not compatible with the purpose for which the data is maintained and made available in the government records or for which it is publicly maintained

Personal Information includes Sensitive Personal Information (see below for more details about Sensitive Personal Information).

4. Categories of Personal Information Collected

Ontic may collect the following categories of Personal Information from you in connection with your interaction with Ontic (which may be as a result of but is not limited to your purchase of goods or services from Ontic, a recruitment process with Ontic or your employment/engagement by Ontic):

Identifiers:	This may include, but is not limited to, name, address, email address, social security number, and driver's license number
Personal Records	This may include, but is not limited to, telephone number, education and employment history, medical information, address, CVs, application forms or other information you provide in the recruitment process, bank account number, credit card number, and debit card number.
Personal Characteristics and Traits:	This may include, but is not limited to, sex, marital status, veteran status, familial status, race, disability, and gender identity/expression.
Commercial Information:	This may include, but is not limited to, benefits records and records of reimbursements of expenses, and personal spending.
Biometric Information:	This may include, but is not limited to, physiological, biological, or behavior characteristics.
Internet Usage Information:	This may include, but is not limited to, browsing history and search history



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Geolocation Data:	This may include, but is not limited to, precise physical location or movements and travel patterns such as tracking equipment on vehicles or company issued devices.
Sensory Data:	This may include, but is not limited to, audio and/or visual recordings such as security cameras in the workplace.
Professional or Employment Information:	This may include, but is not limited to, audio and/or visual recordings such as security cameras in the workplace.
Non-public Education Records:	This may include, but is not limited to, educational institution transcripts, student financial aid, educational achievements, and student disciplinary records.
Inferences from Personal Information Collected:	This may include, but is not limited to, profiles reflecting abilities and aptitudes, aptitude testing results, predispositions, behavior, and personal preferences.
Sensitive Personal Information:	This includes, but is not limited to, age, social security numbers, driver`s license, state identification card, passport number, precise geolocation, racial or ethnic origin, national origin, religious or philosophical beliefs, physical or mental disability, military status, union membership, sex/gender identification/gender expression, mailing address, email address, marital status, etc.

5. Purpose of collecting your Personal Information

We collect the information above:

- (a) to comply with applicable law;
- (b) to facilitate your purchase of goods or services from Ontic; process Your transactions (where Ontic must collect data such as your name, purchase, and payment information);
- (c) to communicate with you about your transactions or account, provide other relevant information, or request information or feedback. From time to time, we may use your personal data to send important notices, such as communications about purchases, changes to our terms, conditions, and policies;



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(d) for use during the job recruitment process to verify your identity; verify your skill sets and professional qualifications; assess your ability to meet the job requirements; to verify references; and to perform, when necessary, background checks and/or drug screening.

- (e) to perform operations and provide employee benefits, which may include payroll and other human resources functions/ activities related to compliance with applicable laws and processing and providing benefits;
- (f) to process interactions, which may include managing employee job duties; payroll processing; administering and maintaining group health insurance benefits; and evaluating performance; and
- (g) to ensure your safety and security while visiting or performing your duties at an Ontic site.

Selling or Sharing Personal Information. Ontic does **NOT**:

- 1) disclose your Personal Information to any third party for monetary or other valuable consideration; or
- 2) disclose your Personal Information to any third party for cross-context behavioural advertising whether or not for monetary or valuable consideration.

6. Categories of Sources used to Collect Personal Information

Ontic generally sources/collects the categories of Personal Information directly from you (for instance, when you provide information as part of a recruitment process or order goods or services from Ontic). In addition, Ontic may source/collect Personal Information from third parties about you where necessary (e.g. in connection with confirming your identity or information provided by you and in connection with the prevention of fraud).

7. Categories of Third Parties to whom we disclose Personal Information

Subject to appropriate privacy and security requirements and for the business purposes described above, Ontic may disclose your Personal Information, including Sensitive Personal Information, to:

- 1) Third party service providers that perform data processing activities on behalf of Ontic;
- 2) Third party service providers that perform security and/or background checks or drug screening services;
- 3) Government and other authorities as required by law;
- 4) Potential purchasers and other parties in connection with the sale, purchase, or merger of a business; and



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5) Others to the extent necessary to comply with applicable law and as otherwise permitted under CCPA.

8. Your Rights Under the CCPA

Subject to certain exemptions set forth in the CCPA, as a California resident you have the following rights:

- 1) The right to receive this Ontic Privacy Policy/Notice at or before the collection of Personal Information.
- 2) Right to Know you have the right to know what Personal Information Ontic has collected.
- 3) Right to Delete you have the right to require that Ontic delete Personal Information that you provided Ontic.
- 4) Right to Correct you have the right to have your objective Personal Information corrected.
- 5) Right to Non-Discrimination you have the right to not be discriminated against should you choose to exercise your rights under the CCPA.

9. Exercising your rights to Know, Delete, and Correct

If you are a California resident and wish to request the exercise of these rights as detailed above or have questions regarding the Personal Information collected or disclosed with third parties, please see the email address in the "Contact Us" section below or call us toll free at 1-888-516-6842. When submitting your email request, please include the specific nature of your request as well as referencing "My California Privacy Rights". As part of your request, Ontic is required to verify you identify. Thus, please provide your first and last name, your mailing address including your zip code, and the last 4 digits of your social security number. If Ontic is unable to verify your request, per the CCPA as a means of protecting your Personal Information, Ontic is not allowed to fulfil your request. If we are unable to verify your identity, Ontic will provide notice to you that it was not able to verify your identity.

1) Request to Know - you are allowed to request all specific pieces of Personal Information that we have collected about you. If you are requesting information with respect to the categories of Personal Information we collect; the purpose of such collection; the categories of sources from which we collect Personal Information; or, the categories of third parties to whom we disclose your Personal Information, please refer to this Privacy Policy/Notice above for such information. If you wish to see your personnel file, you may submit your request in accordance with this Privacy Policy/Notice; or, you may want to consider requesting such Personal Information in accordance with §1198.5 of the California Labor Code. PLEASE NOTE, PER THE CCPA AND FOR YOUR PROTECTION, ONTIC IS NOT ALLOWED TO DISCLOSE SOCIAL SECURITY NUMBERS, DRIVER`S LICENSE NUMBERS, OTHER GOVERNMENT ISSUED ID



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NUMBERS INCLUDING PASSPORTS, FINANCIAL ACCOUNT NUMBERS, HEALTH OR MEDICAL ID NUMBERS, PASSWORDS, SECURITY QUESTIONS, OR UNIQUE BIOMETRIC DATA.

- 2) Request to Delete please note, pursuant to the CCPA, Ontic is ONLY required to delete Personal Information that you provided Ontic. Ontic is not required to delete Personal Information that is collected from other categories of sources. Furthermore, pursuant to the CCPA, Ontic is NOT required to delete Personal Information that is needed for a business purpose such as administering employee benefits. If you make a request to delete information that includes Personal Information that Ontic still needs and Personal Information that Ontic no longer needs, Ontic will retain the Personal Information needed and delete the Personal Information no longer needed. Lastly, Ontic may be required to retain Personal Information for other legal reasons including Personal Information Ontic is required to provide to governmental agencies or that may be needed for ongoing or potential litigation. If you file a Request to Delete, Ontic per the CCPA is required maintain a record of such request for 24 months following the request. If data is archived or on a backup system, Ontic is only required to delete that Personal Information when those systems are next accessed.
- 3) Request to Correct Ontic is only required to correct objective data. Ontic is not required to correct subjective data, performance reviews for example.

10. Responding to your Request.

Ontic will acknowledge receipt of your request and will advise you how long we expect it will take to respond. Ontic will fulfil requests within 45 days of receiving a verifiable request. Nevertheless, there may be situations requiring Ontic to extend the response time by another 45 days in which case Ontic will notify you of the time extension. Please note, per the CCPA Ontic has the right to deny any request that is "manifestly unfounded or excessive".

Ontic also has the right to deny any Request to Know

- 1) If the requested Personal Information was collected prior to January 1, 2022;
- 2) If the request is the third or more such request in any 12-month period.
- 3) If you are asking for Personal Information collected prior to the previous 12 months of the date of your request and responding to such request proves impossible or involves a disproportionate effort; or
- 4) If Ontic no longer has your Personal Information.
 - If Ontic denies or is unable to fulfil your request, Ontic will inform you of the reason(s).

Authorized Agents. To the extent that you elect to designate an authorized agent to make a request on your behalf, they must provide appropriate documentation including written signed permission from you, proof of your identity, and verification



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of their identity; or a valid, designated power of attorney as defined under the California Probate Code.

Contact Us.

When contacting us, either via phone or email, please include:

- 1) Whether you are a current, former, or temporary worker or whether you were a job applicant
- 2) which department you work in or worked in, as applicable
- 3) the specific nature of your request as well as referencing "My California Privacy Rights" and
- 4) your first and last name, your mailing address including your zip code, and the last 4 digits of your social security number.

Address: 20400 Plummer Street, Chatsworth, 91311, USA.

Phone: 1-888-516-6842

Email: privacy@ontic.com



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Annex 1 – Ontic Group companies that this policy applies to

Territory	Ontic Group Company
US	Ontic Engineering & Manufacturing Inc
	Centroid, Inc.
	Firstmark Aerospace Corp.
	Aircraft Belts, Inc.
	Twin Commander Aircraft, LLC