

Privacy Policy for Equans North America

Effective date: October 17, 2023

Equans North America (“Equans North America”, “we”, “us”) is dedicated to safeguarding and honoring your privacy. This Privacy Policy outlines our practices of collecting and handling personal information that we obtain from various sources such as customers, prospective customers, website visitors (“you” or “your”), as well as affiliates, service providers, and other third parties. This Privacy Policy furthermore applies both to our offline and online information practices, including information collected via the website <http://www.equans-na.com>. The term “personal information” in this Privacy Policy refers to any information that can be used to identify you or that identifies you directly.

(A) Personal Information We Collect

As a business, we collect personal information for the purposes of providing services to you and for related business purposes disclosed in this Privacy Policy. The types of personal information relating to you that we may collect, and the purposes for which we process this information, depends on the nature of your interaction with us.

In particular, we may have collected the following categories of personal information within the last twelve (12) months.

1. Visitors to the Website

If you visit our website or interact with us via our website, we may collect the following categories of information about you:

- Identifiers such as your real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- Personal information described in the California Consumer Records Act, Section 1798.80, subdivision (e) such as your name, address, telephone number, and employment.
- Characteristics of protected classifications under California or federal law.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an internet website application, or advertisement.
- Approximate geolocation data. For example, we may receive information about what city and state your device is located in when accessing our website.
- Professional or employment-related information. For example, we may receive information as to which company you are employed by or affiliated with.

2. Customers

While providing services to customers or prospective customers, we may collect and use personal information about individual customers, employees of customers, and business owners; as well as other parties who may have dealings with our customers in the context of

providing services. The sources of this personal information are our customers themselves. Furthermore, we occasionally obtain information about our customers from public websites, social media platforms, and other third-party sources.

The categories of information we may collect regarding our customers or prospective customers (depending on the nature of the services provided) include:

- Identifiers, such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- Personal information described in the California Consumer Records Act, Section 1798.80, subdivision (e), such as name, address, telephone number, and employment.
- Characteristics of protected classifications under California or federal law.
- Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a customer's interaction with an internet website application, or advertisement.
- Approximate geolocation data. For example, we may receive information about what city and state your device is located in when accessing our website.
- Professional or employment-related information. For example, we may receive information as to which company you are employed by or affiliated with.

(B) Categories Of Sources From Which We Collect Personal Information

We may obtain the categories of personal information listed above from the following categories of sources:

- Directly from you or your representatives. For example, information that our customers provide to us related to doing business with us or when contacting us using our Contact Form
- Operating systems and platforms. For example, we collect information about your device's interaction with our website.
- Information available on public websites and social media platforms, such as LinkedIn.
- Our service providers. For example, data analytics companies that provide information that helps us understand how you use our website.
- Our affiliates. For example, we may direct customers' service requests received by any of our affiliates to the Equans affiliate nearest the requested service location.

(C) Purposes For Collecting Personal Information From Consumers

We collect personal information to:

- Provide the information and/or services you request.
- To operate, troubleshoot, and improve our offering of services.
- Respond to your inquiries.
- To understand how people use our services, including by generating and analyzing statistics.
- Operate and improve online services.
- Personalize online and offline content.
- Market, advertise and assess the effectiveness of our promotional campaigns, publications, and services.
- To send you publications, press releases, marketing communications, and other information or materials related to us that may interest you.
- Maintain safety in our offices and combat illegal activities.
- For internal administration, data analysis, billing, and detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.
- Comply with legal obligations and to enforce our rights
- To host, store and otherwise process information needed for business continuity and disaster recovery
- To evaluate or conduct a merger, reorganization, dissolution, or other sale or transfer of some or all of our assets, or similar corporate transaction or proceeding, in which personal information held by us is among the assets transferred.

(D) Disclosure Of Personal Information To Our Service Providers

In order to fulfill the purposes identified in Section C above, we may partner with service providers. For example, we may partner with electronic communication partners to communicate with you and to provide our online services to you. We may disclose your personal information to a service provider for a disclosed business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the service provider to both keep that personal information confidential and not use it for any purpose except performing the contract. Our agreements with our service providers shall impose similar terms with respect to information practices as set forth in this Privacy Policy, and will be not less protective than those imposed on Equans North America.

(E) Categories Of Personal Information We May Have Sold Or Shared In The Preceding 12 Months; Categories of Third Parties To Whom Such Information May Have Been Sold Or Shared

While under most circumstances Equans North America’s information practices do not involve sale or sharing of consumer personal information, some consumer privacy laws broadly define these and similar terms. According to California consumer privacy law, a “sale” includes disclosing, making

available or communicating personal information to a third party (except our affiliates, service providers or contractors) in exchange for monetary or other valuable consideration. "Sharing" includes disclosing, making available or communicating personal information to a third party for cross-context behavioral advertising, whether or not for any monetary or valuable consideration.

Under no circumstances does Equans North America sell or share personal information we collect from our customers, prospective customers, and website visitors (other than as disclosed under Cookies below). Equans North America does not sell or share the personal information of known minors under 18 years of age.

Certain of our services to our customers and prospective customers may be deemed a "sale" or "sharing" under applicable law. For example, we utilize web analytics services such as YouTube (Google) to track the performance of our website, to understand our target audiences better and tailor our content strategies accordingly. This data helps us identify areas for improvement and make informed decisions to enhance our digital presence, to analyze traffic sources and measure the effectiveness of marketing channels, allowing us to allocate resources effectively. Furthermore, we can assess the performance of our content, identify popular pages, and create more valuable content for our audience.

In the preceding twelve (12) months, we may have shared with or sold to third parties the following categories of personal information:

1. Categories of Personal Information Sold or Shared
 - a. Internet or other electronic network activity information
2. Categories of Third Parties to Whom the Information Was Sold or Shared
 - a. Consumers have the right to opt out of the sale and sharing of personal information. To exercise this right, please follow following the instructions on our Do Not Sell or Share My Personal Information link.

(F) Information On Consumers Under The Age of Eighteen (18)

We do not knowingly collect any personal information from visitors or users of our website who are under the age of 18. If you have reason to believe that a child under the age of 18 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

(G) Our Use Of Consumers' Sensitive Personal Information

Equans North America does not collect or use "sensitive personal information" within the meaning of the CCPA.

(H) Cookies And Similar Technologies

Cookies are small text files placed on your device to store data that can be recalled by a web server in the domain that placed the cookie. We use cookies and similar technologies for storing and honoring your preferences and settings when accessing and interacting with our website, combating fraud, analyzing how our website performs, customizing advertisements, and fulfilling other legitimate purposes. We also may use "web beacons" to help deliver cookies and gather usage and performance data. Our website may include web beacons, cookies, or similar technologies from third-party service providers.

You have a variety of tools to control the data collected by cookies, web beacons, and similar technologies. For example, you can use controls in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies.

We may allow certain third parties, such as data analytics or online advertising service providers, to collect your browsing activity on our website in a manner that may be deemed to involve a sale of personal information under applicable law.

Through our use of these third party tools, we may have sold to such third parties the following categories of personal information of our website within the last twelve (12) months:

- Internet or other electronic network activity information

Depending on your state of residence, you may have the right to opt out of the sale and sharing of personal information. To exercise this right, please follow the instructions on our Do Not Sell or Share My Personal Information link.

For more information, please see our [Cookie Policy](#).

(I) How Long Your Personal Information Will Be Kept

We will keep your personal information while you have an account with us or while we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf
- To provide services as contracted for by you
- To comply with legal obligations and to enforce our rights
- To show that we treated you fairly
- To keep records required by law

We will not retain your personal information for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of personal information. When it is no longer necessary to retain your personal information, we will delete or anonymize it.

(J) Transfer of Personal Information Outside Of The United States

Equans North America may share personal Information with its affiliates, service providers and other third parties, some of which may be located outside of the United States. Personal information may be transferred to, stored, and maintained on Equans' Group servers, some of which are located outside of the United States. Equans North America and its website are based in North America and are intended for residents of the United States and Canada. If you are accessing our website from outside of the United States, please be aware that information collected may be transferred to, processed, stored, and used in the United States and in other locations other than your location of residence. Data protection laws in other jurisdictions may be different from those of the United States and provide a lower level of protection. Information transferred to the United States may be accessed by government and law enforcement in accordance with the laws of the United States. Your

use of our website, or provision of any information via our website, therefore, constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including personal Information both in and outside the United States as set forth in this Privacy Policy.

(K) Websites Operated By Affiliates, Service Providers, And Third Parties

Equans Noram's website may include hyperlinks to websites or applications operated by third parties, service providers and affiliates. These separately operated websites may use their own cookies, web beacons, and other tracking technologies to independently collect information about you and may also solicit personal information from you. For example, a service provider operates Equans Group's job postings and application website, and visitors to that website who apply for a job may be asked to provide personal information such as job and educational history, citizenship, disability information, gender, and ethnicity, etc. Additionally, our affiliates operate their own websites, and may collect personal information for additional business purposes, for example, completing financial transactions related to services performed by an affiliate. Equans North America is not responsible for the privacy policies and practices, nor the content of websites or applications operated by affiliates, service providers, and third parties, each of which has their own privacy policies. We encourage you to read them. You agree that Equans North America shall not be held liable for any function or content of such websites or applications operated by affiliates, service providers, and third parties.

(L) Your Privacy Rights

Depending on your state of residence, you have certain rights with respect to your personal information that we collect and use. These may include:

Right to Know: the right to know what personal information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer.

You may also have the right to request that we transfer information about you to a third party. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- o sales, identifying the personal information categories that each category of recipient purchased; and

- o disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

- If requested by you, we will provide you with a copy of the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party.

Right to Delete: the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a product or service that your employer requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your or your employer's relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you or your employer provided it.

Right to Correct: the right to request that we update any information about you that is inaccurate or incomplete. Once we receive and confirm your verifiable consumer request, we will update (and direct our service providers to update) your personal information in our records. You also have the right to require us to restrict processing of your personal information in certain circumstances, e.g. if you contest the accuracy of the personal information.

Right to Opt-Out of the Sale or Sharing of Personal Information: the right to opt-out of the sale or sharing of your personal information by us. Once we receive and confirm your verifiable consumer request, we will no longer sell or share your personal information.

Right to Limit the Use or Disclosure of Sensitive Personal Information: the right to request that we limit our use of your sensitive personal information to that which is necessary to perform the services or provide the goods that you reasonably expect of us, with some narrowly tailored exceptions.

Right to Non-Discrimination:

We will not discriminate or retaliate against you for exercising any of your privacy rights. In that regard, we will not take the following actions in response to your exercising of your privacy rights, unless permitted by the applicable laws:

- Deny you services.
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of services.
- Suggest that you may receive a different price or rate for services or a different level or quality of services.

Exercising Your Rights:

To exercise the rights described above, please submit a verifiable consumer request to us by either:

Email:

communications.equansna@equans.com

Postal Address:

Equans North America

52 Vanderbilt Ave.

Floor 7

New York, NY 10017

You may be limited in the number of verifiable consumer requests for access or data portability in any given 12-month period (for example, twice per 12-month period for California residents). The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or a legally authorized representative.

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- Before responding to your privacy rights request, we must verify your identity. We will do so by matching at least two reliable data points from your request to the information that we maintain about you. For certain more sensitive personal information, we may require further verification, including obtaining the consumer's signed declaration under penalty of perjury to further confirm that the requestor is the consumer. Once you contact us to exercise your rights, we will further guide you as to our verification process.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Authorized Agents:

Only you or a person that you or your employer authorize to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may use an authorized agent to submit a privacy rights request on your behalf if you provide the authorized agent a written permission signed by you. We may also require you to do either of the following:

- Verify your own identity directly with us.
- Directly confirm with us that you provided the authorized agent permission to submit the request.

We may deny a request from an authorized agent if the agent does not provide to us your signed permission demonstrating that they have been authorized by you to act on your behalf, or if you do not confirm to us that you provided the authorized agent permission to submit the request.

The requirement to obtain and provide written permission from the consumer does not apply to requests made by an opt-out preference signal.

Response Timing and Format:

We will acknowledge your request no later than ten (10) business days after receiving your request to delete, request to correct, or request to know and provide information about how we will process the request. The information provided shall describe in general our verification process and when you should expect a response, except in instances where we have already granted or denied the request.

We shall respond to a verifiable consumer request within forty-five (45) calendar days of its receipt. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide

your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. For example, in cases where requests from a consumer are distinctly unsubstantiated or excessive, in particular because of their repetitive character, we may either charge a reasonable fee, in our discretion, taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request altogether.

(M) Global Opt Out Preference Signal

Global Opt-Out Preference Signal or Global Privacy Control (GPC) is a feature available in some web browsers that allows users to communicate their preference for not being tracked across websites. Currently, only certain internet browsers (DuckDuckGo, Brave, Mozilla Firefox) or a separately installed plug-in enable universal opt-out signals. While the Global Privacy Control and universal opt-out signals are still developing, we are monitoring the status of implementation and are consistently configuring our website to honor consumer's opt-out signals.

Processing this signal typically involves several steps, including:

Receipt and verification of the signal: When we first receive the opt-out preference signal from the consumer, we will verify that it is authentic and valid. This may involve confirming the identity of the consumer, ensuring that the signal was sent from a valid email or other contact address, or using other methods to ensure that the signal is legitimate.

Updating data systems: Once the opt-out preference signal has been verified, we will update our data systems to reflect the consumer's preferences. This may involve adding your name and contact information to a "do not contact" list or other database, or marking your existing record in a customer relationship management (CRM) system as opted-out.

Communicating changes to relevant parties: If your opt-out preference signal affects other parties who have access to your personal information, such as third-party service providers or partners, we will communicate the changes to those parties and ensure that they also update their data systems accordingly.

Compliance monitoring: We will monitor our data systems and processes to ensure ongoing compliance with your opt-out preference signal. This may involve periodically reviewing our data systems to ensure that your preferences are being respected, and taking corrective action if necessary.

If you want to turn on Global Privacy Control on your browser, you can follow these steps:

1. Open your web browser and go to the settings or preferences menu. The location of this menu may vary depending on the browser you are using.
2. Look for the "Privacy" or "Security" section in the settings or preferences menu.
3. Scroll down to find the option for "Global Privacy Control" or "Do Not Track."

4. Toggle the switch to turn on Global Privacy Control. In some browsers, you may need to check a box or select a radio button to enable this feature.

5. Once Global Privacy Control is turned on, your browser will send a signal to websites that you do not want to be tracked. However, it's important to note that not all websites may honor this signal, and some may continue to track your activity.

6. To verify that Global Privacy Control is working, you can visit the website <https://globalprivacycontrol.org/> and check if it displays a message indicating that your browser is sending the "Do Not Track" signal.

By turning on Global Privacy Control on your browser, you can have greater control over your online privacy and limit the amount of information that websites and advertisers can collect about you.

(N) Keeping Your Personal Information Secure

Equans North America has reasonable technical, physical and administrative security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. These measures offer an appropriate reasonable security level, taking into account the state of the technology, the implementation costs and also the nature, the scale, the context and the processing purposes. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. The measures are also intended to prevent unnecessary collection and further processing of personal information. The personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

(O) Disclaimer/Limitation Of Liability For Data Input Errors

Equans North America is not responsible for any errors that are made by you in inputting data, nor for data entered by someone using your credentials. **PLEASE SECURE YOUR CREDENTIALS AND DO NOT DISCLOSE THEM TO ANYONE ELSE.** If your credentials are compromised, please notify us at communications.equansna@equans.com.

Under no circumstances shall Equans North America be liable to you for, without limitation, the website not being available for use, for lost or corrupted data, for errors in the information provided to you, if any, or for the failure of data archiving. Except to the extent required by law, if any, Equans North America will not be liable for any consequential, special, indirect, or punitive damages, even if advised of the possibility of such damages, or for any claim by any third party.

(P) Changes To Our Privacy Policy

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will notify you by email or through a notice on our website's homepage. You will also be able to determine the date that our current Policy has become effective, by viewing the Effective Date at the beginning of this Policy.

(Q) Contact Information

If you have any questions or comments about this Policy, the ways in which we collect and use your personal information, your choices and rights regarding such collection and use, or you wish to exercise your rights under this Policy, please do not hesitate to contact us at:

Email:

communications.equansna@equans.com

Postal Address:

Equans North America

52 Vanderbilt Ave.

Floor 7

New York, NY 10017