

Privacy Notice for Third Party Contractors

L1-007-PL3

1. Purpose and Scope

AECOM has issued this Privacy Notice to provide third party contractors working on behalf of the Company and its subsidiaries and affiliates (collectively with AECOM, “AECOM” or the “Company”) with notice about how the Company collects, uses, and processes your Personal Information.

AECOM will only process your Personal Information in accordance with this Privacy Notice unless otherwise required by applicable law. The Company takes steps to ensure the Personal Information collected about you is adequate, relevant, not excessive, and processed for limited purposes.

This Privacy Notice does not cover data rendered anonymous. Data is rendered anonymous if individual persons are no longer identifiable.

2. Privacy Notice

This Privacy Notice describes methods used by AECOM to manage Personal Information received during the course of interactions with its current, prospective, and former consultants, sub-consultants and sub-contractors (“Third Party Contractors”).

The information collected by AECOM about you varies based on the requirements, what is appropriate to evaluate and compensate you in an applicable jurisdiction, and what may be required to adhere to applicable law, to ensure the quality of our products and services, and provide a safe workplace for you.

The following are the general categories and some examples of the categories of personal information collected and maintained by AECOM:

Category	Examples of Personal Information
General Information	Name, address, age, date of birth, gender, contact information, driver’s license and automobile plate number, social security number/national ID number, curriculum vitae, resumes, photograph for identification purposes, civil status, marital status, or personal information you otherwise voluntarily provide us.
Performance Evaluation	Record of performance evaluations and reports.
Remuneration	Bank routing and account numbers
Sensitive or Potentially Sensitive Information	Trade union membership, race/ethnicity, health information, credit card reports, background checks, reference checks, citizenship/immigration information; and bank account numbers.

2.1 How AECOM Collects Personal Information About You

We use different methods to collect data from and about you via:

- **Direct Interactions:** You give us your Personal Information when contacting us in response to job/project opportunities, through questionnaires, proposals or other means. This includes information you provide when you submit your resume and contact details through our website or email.
- **Third Parties or Publicly Available Sources:** AECOM may obtain information about you from publicly available online records, or past or current professional references you supply to the Company.

2.2 Purposes for Processing Personal Information

AECOM 'processes' Personal Information to select suitable Third Party Contractors through the organization's selection process and assessing and confirming a company's suitability for the work to be contracted, manage business operations, payment for services, administration, accounting and auditing, assessing qualifications for a particular job or task, business and safety and security purposes. These principal purposes include:

- **Regulatory and Legal Compliance:** AECOM uses information to comply with applicable legal and regulatory requirements, including compliance with applicable anti-corruption laws such as the U.S. Foreign Corrupt Practices Act, Foreign Ownership, Control or Influence and the U.K. Bribery Act.
- **Business Relationship Management:** AECOM uses information as appropriate to evaluate your performance, complying with applicable legal requirements, sharing data with Company affiliates or clients, and communicating with you and your representative(s).
- **Business Process Execution and Management:** AECOM uses information to run its operations. Some examples are: project management, environmental, safety, quality assurance and proposals.
- **Safety and Security:** AECOM uses information as appropriate to ensure the safety and protection of AECOM employees, resources, and workplaces. Some examples are: protecting occupational health and safety, conducting investigations, and recording and monitoring network activity for the purpose of identifying, predicting, and preventing the entry of malicious activity onto or the release of information from AECOM network and computing resources.
- **Quality:** AECOM uses information as necessary to qualify Third Party Contractors for performing work in accordance with applicable quality standards such as ISO 9001 and NQA-1, including use of individuals who are required to maintain specific qualifications or certifications.

AECOM may need to collect Sensitive Personal Information. Where required under applicable local law, such Personal Information will only be processed with your consent. Where required by applicable local law or the EU-U.S. Privacy Shield, consent to transfers or uses of Sensitive Personal Information will be opt-in.

We do not undertake automated decision making or profiling on Personal Information or Sensitive Personal Information.

2.3 Legal Basis for Processing of Personal Information

For AECOM to process Personal Information we must have a lawful basis for doing so and at least one of the following must apply:

- a. **Consent:** an individual must give clear consent for us to process their personal information and then only for a specific purpose.
- b. **Contract:** the processing is necessary for a contract that AECOM has with an individual, or because we have asked the individual to take specific steps before entering into a contract.
- c. **Legal Obligation:** the processing is necessary for AECOM to comply with the law.
- d. **Vital Interests:** the processing is necessary to protect someone's life.
- e. **Public Task:** the processing is necessary for AECOM to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- f. **Legitimate Interests:** the processing is necessary for the purposes of the legitimate interests pursued by AECOM or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular, where the data subject is a child.

The Company generally relies on legitimate interests and legal basis for processing your Personal Information, unless otherwise required by applicable data protection law.

2.4 Data Sharing and Transfer

- **Affiliates:** AECOM entities share information among AECOM subsidiaries and affiliates for the purposes described in this Privacy Notice where consistent with applicable legal requirements.
- **Third Party Suppliers:** At times, AECOM entities may decide to share Personal Information to selected affiliated or third party suppliers to perform services on their behalf. Third parties may include, but are not limited to: Information Technology Providers, Cloud Providers, Data Hosting Services, and Data Storage.
- **Clients:** AECOM may be required to disclose Personal Information as part of our professional services to our clients, including governmental agencies for the purpose of security clearances or as required by security protocols.
- **International Cooperation and Development:** AECOM may be required to submit your Personal Information to the European Commission Delegations as part of the proposal and tender process.
- **Other Third Parties:** AECOM entities disclose certain Personal Information to other third parties:
 - i. where required by law or legal process (e.g., to tax and social security authorities);
 - ii. where AECOM determines it is lawful and appropriate;
 - iii. to protect AECOM's legal rights (e.g., to defend a litigation suit or pursuant to a government investigation or inquiry) or to protect Company employees, resources, and workplaces; or
 - iv. in an emergency where the health or security of you or other person or entity is at stake.
- **Public Security/Law Enforcement:** AECOM may be required to disclose Personal Information in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

AECOM is a global company, with offices, Clients, and Suppliers located throughout the world. As a result, your Personal Information may be transferred to other AECOM offices, data centers, and servers in Europe, Asia, South America, or the United States for the purposes identified. Any such transfer of Personal Information shall take place only in accordance with applicable law.

AECOM will take steps designed to comply with all applicable local laws when Processing Personal Information, including any local law conditions for and restrictions on the transfer of Personal Information. AECOM may also protect your data through other legally valid methods, including international data transfer agreements or Standard Contractual Clauses that have been recognized by Data Protection Authorities as providing an adequate level of protection to the Personal Information we Process globally.

AECOM will ensure all transfers of Personal Information are subject to appropriate safeguards as defined by the regulation.

AECOM complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. AECOM has certified to the Department of Commerce that it adheres to the Privacy Shield Principles.

AECOM's accountability for Personal Information received under the Privacy Shield and subsequently transferred to a third party is described in the Privacy Shield Principles: <https://www.privacyshield.gov/>.

If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

If you have a Privacy Shield-related (or general privacy-related) question, we encourage you to contact us at privacyquestions@aecom.com. As explained in the Privacy Shield Principles, a binding arbitration option will be made available to you to address residual complaints not resolved by any other means. AECOM is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

2.5 Security and Confidentiality

AECOM will take reasonable and appropriate steps to protect Personal Information against unauthorized access, loss, misuse, disclosure, alteration, destruction and other Processing of Personal Information. These measures account for the sensitivity of the 'processing' operation concerned and of the Personal Information concerned, and the risks involved.

AECOM will restrict access to Personal Information to those employees, agents and contractors of AECOM who have a legitimate business need for such access.

Security procedures are maintained at AECOM facilities to manage access. In many instances, AECOM uses security surveillance cameras in parking lots and other areas of our workplaces to safeguard you. Additionally, access may be monitored and only personnel with appropriate authorization permitted within areas of AECOM facilities.

Communications and network security controls have been put in place requiring authentication to access computer systems, networks, and other resources. Safeguards are in place to alert AECOM when actual or suspected unauthorized access takes place.

2.6 Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or contractual reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Information, we consider our statutory obligations, the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes we process your Personal Information for, and whether we can achieve those purposes through other means.

Under some circumstances we may anonymize your Personal Information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer providing services to us, we will retain and securely destroy your personal data in accordance with our policies and applicable laws and regulations.

2.7 Your Rights

Where permitted by applicable law, you have rights with respect to the collection and processing of your Personal Information, further described below. You may submit a request to exercise these rights to the AECOM Privacy Office at privacyquestions@aecom.com.

- a. You will be provided access to your own Personal Information. AECOM may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.
- b. You have a responsibility to assist AECOM in keeping the Personal Information AECOM maintains about you accurate, complete and current. If any Personal Information is inaccurate or incomplete, you may request that the Personal Information be corrected or completed. AECOM will correct or delete Personal Information as required by applicable law. You may also request to correct, amend, or delete Personal Information that has been processed in violation of the EU-U.S. Privacy Shield Principles or applicable data protection law.
- c. Where you have provided your consent to the collection, processing, or transfer of your Personal Information, you may have the legal right to withdraw your consent. Where we have processed your Personal Information with consent, you can withdraw that consent at any time. Note that withdrawing your consent will not affect the

lawfulness of any processing we conducted prior to your withdrawal nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

- d. You have the right to receive your Personal Information provided by you to us and have the right to send the data to another organization (or ask us to do so if technically feasible) where our lawful basis for processing the Personal Information is consent or necessity for the performance of our contract with you and the processing is carried out by automated means.
- e. You have the right to request to object or restrict processing of your Personal Information.

2.8 Other Important Information

- a. Privacy laws and guidelines are part of a constantly changing environment. AECOM reserves the right, at its discretion, to change, modify, add, or remove portions of this Privacy Notice or any supplemental privacy notice at any time. Any material change to this Privacy Notice will be made available to you.
- b. AECOM is generally a data controller for the Personal Information processed; however, AECOM may provide some services to clients as a data processor (in which case the client is the data controller).
- c. AECOM has designated JAMS, an alternative dispute resolution provider, to address complaints and provide appropriate recourse free of charge to individuals with respect to the Privacy Shield. Individuals may contact JAMS at <https://www.jamsadr.com/eu-us-privacy-shield>. As explained in the Privacy Shield Principles, a binding arbitration option will be made available to you in order to address residual complaints not resolved by any other means. AECOM is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.
- d. If you consider that your rights have not been adequately addressed, you have the right to submit a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred.

2.9 Contacting AECOM Privacy Office

Any questions regarding this Privacy Notice, Privacy Shield or general privacy-related question concerning your information should be addressed to the AECOM Privacy Office at privacyquestions@aecom.com.

3. Terms and Definitions

- a. **Personal Information** any information relating to an identified, or an identifiable, natural person.
- b. **Process or Processing** any operation or set of operations that are performed upon Personal Information, whether by automatic means or otherwise. This includes the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, disclosure by transmission, dissemination or making available in any other form, linking, alignment or combination, blocking, erasure or destruction of Personal Information.
- c. **Sensitive Personal Information** is defined by local law and may include Personal Information relating to an individual's racial or ethnic origin, political opinions, religious or political beliefs, sexual orientation, trade-union membership, information specifying health or medical conditions, sex life, social security number, or criminal records.

4. Change Log

Rev #	Change Date	Description of Change	Location of Change
0	20-May-2019	Initial Release as L1-007-PL3.	