

Last Updated and Effective Date: 4/24/2026

CALIFORNIA JOB APPLICANT PRIVACY NOTICE

The purpose of this Privacy Notice (“**Notice**”) provided by Lawson Products Inc. and our subsidiaries and affiliated companies, including Kent Automotive (collectively “**Lawson**,” “**we**,” “**our**,” or “**us**”) is to inform California job applicants (“**Applicant**” or “**you**”) regarding our Personal Information handling practices and their data privacy rights.

For purposes of this Notice, “**Personal Information**” is 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 or household. In addition, “**Sensitive Personal Information**” is Personal Information that requires special handling under applicable law.

Personal Information and Sensitive Personal Information do not include deidentified and aggregated information (which includes data that is not reasonably capable of identifying you or being linked to you) and do not include certain publicly available information. When using deidentified data, we publicly commit to maintain and use the information in that form and not attempt to reidentify the information, unless permitted or required by law.

This Notice applies only to information that we collect about you in connection with your job application and, if an offer of employment is provided, before starting employment on the first day of the job. To learn more about how we process Personal Information in other contexts, please see our website privacy policy at <https://www.lawsonproducts.com/pages/privacy-policy>.

If you have trouble accessing this Notice because of a disability, you can contact us at recruiting@lawsonproducts.com to receive it in an alternative format.

I.	NOTICE AT COLLECTION	1
A.	Collection and Use of Personal Information	1
B.	Collection and Use of Sensitive Personal Information	3
C.	Disclosing Your Personal Information	5
D.	Selling or Sharing of Personal Information	6
II.	SUMMARY OF CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED IN THE PRECEDING 12 MONTHS	6
III.	YOUR PRIVACY RIGHTS	12
IV.	COMMUNICATIONS PREFERENCES	13
V.	CONTACT US	13
VI.	UPDATES	13

I. NOTICE AT COLLECTION

A. Collection and Use of Personal Information

We collect and retain different categories of Personal Information about Applicants. We collect Personal Information you provide directly to us as well as information we obtain from other sources, such as recruiters, your former employers, and information available about you through public sources and widely distributed media. Below, we describe the categories and specific types of Personal Information we may collect during the application stage and the additional types of Personal Information we may collect during the time period between an offer being extended and you starting your first day of work.

1) *Personal Information Collected During the Application Stage*

Category of Personal Information	Retention Period	Purposes for Collection or Use of Personal Information
Identifiers , such as name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers.	We retain your Personal Information during the length of time we are considering you for the position you applied for. If hired, we will also retain your Personal Information during the course of your employment. If you are no longer a candidate for the position or an employee, we will retain your Personal Information as long as necessary for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations and based on our company	• To consider your candidacy for employment • To perform human resources functions • To communicate with you • To determine your eligibility to work and suitability for certain jobs or benefits (to the extent permitted or required by law) • To address our legal obligations • To monitor, assess and ensure compliance with corporate rules and policies • To comply with applicable legal and regulatory requests and obligations (including investigations) • To establish or defend legal claims and allegations • For security purposes, including: ○ to prevent, detect or investigate fraud, suspected or actual illegal activity ○ to investigate security breaches
Any Personal Information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)) , such as name, physical characteristics or description, address, telephone number, education, employment, employment history, or medical information (collected only in connection with voluntary disclosure of disability status).		
Characteristics of protected classifications under California or federal law , such as race, color, sex (including pregnancy, sexual orientation, or gender identity), national origin, citizenship status, disability information, medical condition (collected only in connection with voluntary disclosure of disability status), or military or veteran status.		
Internet or other electronic network activity information , such as browsing history, search history, and information regarding your interaction with us and our systems.		
Geolocation data , such as your postal or business address.		

Category of Personal Information	Retention Period	Purposes for Collection or Use of Personal Information
Audio, electronic, visual, or similar information.	Retention Schedule.	○ to protect our property from theft, vandalism and damage ● To seek advice from lawyers, auditors and other professional advisers ● To ensure your health and safety and to assess your physical, legal, or other eligibility to work, and to provide appropriate workplace adjustments during the application period and candidacy consideration
Professional/employment-related information , such as employment history, references, awards, qualifications, certificates, licenses, professional memberships, and any other information you choose to provide in your resumes and/or applications.		
Education information , such as school name, degree, major, and graduation date.		
References , such as opinions and comments of any previous employers.		
Inferences drawn from any of the information processed.		
Other , such as areas of interest, how you heard about us, whether you would like to receive text messages, eligibility to work in a particular country necessary for the job, sponsorship requirements, and whether you were referred by an employment agency or a Lawson or Kent employee.		

2) Personal Information Collected After an Offer Is Extended and First Day of Work

Category of Personal Information	Retention Period	Purposes for Collection or Use of Personal Information
Identifiers , such as date of birth, Social Security number, driver's license number, passport number, or other similar identifiers.	We retain your Personal Information during the length of time we are considering you for the position you applied for. If hired, we will also retain your Personal	● To consider whether you can start your first day of employment ● To perform human resources functions ● To communicate with you ● To determine your eligibility to work and suitability for certain jobs or benefits (to the extent permitted or required by law)
Any Personal Information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)) , such as signature, Social Security number, passport number, driver's license or state identification card number, or insurance policy number.		

Category of Personal Information	Retention Period	Purposes for Collection or Use of Personal Information
Characteristics of protected classifications under California or federal law , such as age (40 or older) or marital status.	Information during the course of your employment. If you are no longer a candidate for the position or an employee, we will retain your Personal Information as long as necessary for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations and based on our company Retention Schedule.	• To address our legal obligations • To monitor, assess and ensure compliance with corporate rules and policies • To comply with applicable legal and regulatory requests and obligations (including investigations) • To establish or defend legal claims and allegations • For security purposes, including: ○ to prevent, detect or investigate fraud, suspected or actual illegal activity ○ to investigate security breaches ○ to protect our property from theft, vandalism and damage • To seek advice from lawyers, auditors and other professional advisers • To ensure your health and safety and to assess your physical, legal, or other eligibility to work, and to provide appropriate workplace adjustments
Results of Background Checks and Screening , such as education verification, criminal records, driving license checks, and credit checks.		
References , such as opinions and comments of any previous employers.		
Inferences drawn from any of the information processed.		

B. Collection and Use of Sensitive Personal Information

We may collect the following types of information in connection with your candidacy for employment, which may be considered Sensitive Personal Information. We collect Sensitive Personal Information you provide directly to us as well as information we obtain from other sources, such as recruiters, background check providers, your former employers, and information available about you through public sources and widely distributed media. We may collect and use Sensitive Personal Information for the limited purposes identified below. Because we use your Sensitive Personal Information for these limited purposes (i.e., to consider your candidacy for employment and to perform our human resources functions), there is no need for us to provide a Limit Use and Disclosure of Sensitive Personal Information right under California law. Below, we describe the

categories of Sensitive Personal Information we collect during the application stage and the additional types of Sensitive Personal Information we may collect during the time period between an offer being extended and you starting your first day of work.

1) Sensitive Personal Information Collected During the Application Stage

Types of Sensitive Personal Information	Retention Period	Purposes for Collection or Use of Sensitive Personal Information
● Account log-in ● Racial or ethnic origin ● Citizenship or immigration status ● Personal Information collected and analyzed concerning health (collected only in connection with voluntary disclosure of disability status)	We retain your Personal Information during the length of time we are considering you for the position you applied for. If hired, we will also retain your Personal Information during the course of your employment. If you are no longer a candidate for the position or an employee, we will retain your Personal Information as long as necessary for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations and based on our company Retention Schedule.	● To perform and provide services related to your job application and candidacy consideration ● To perform human resources functions ● To detect and prevent security incidents, and provide access to our systems and facilities during the job application process ● To ensure your physical safety, such as to address our legal obligations in relation to health and safety in the workplace

2) Sensitive Personal Information Collected After an Offer Is Extended

Types of Sensitive Personal Information	Retention Period	Purposes for Collection or Use of Sensitive Personal Information
• Social Security number, driver's license, state identification card, or passport number • Union membership	We retain your Personal Information during the length of time we are considering you for the position you applied for. If hired, we will also retain your Personal Information during the course of your employment. If you are no longer a candidate for the position or an employee, we will retain your Personal Information as long as necessary for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations and based on our company Retention Schedule.	• To perform and provide services related to your job application and candidacy consideration • To perform human resources functions • To detect and prevent security incidents, and provide access to our systems and facilities during the job application process • To ensure your physical safety, such as to address our legal obligations in relation to health and safety in the workplace

C. Disclosing Your Personal Information

We may disclose your Personal Information for the purposes set out in this Notice, as explicitly consented to by you, or as legally justified. We may disclose your Personal Information to the categories of recipients below.

- Service providers, contractors or other like parties who provide services to us, such as

recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services.

- Internal staff, including members of the human resources team and IT staff, if necessary for the performance of their roles.
- Between and among Lawson and our current or future parents, affiliates, and subsidiaries and other companies under common control and ownership if any.
- Lawson designated first responders, if necessary to assist in the event of an emergency.
- A newly formed or acquiring organization if Lawson is involved in a merger, sale or a transfer of some or all of its business.
- Our business advisors, such as legal advisors, insurers, accountants and auditors, to the extent this is necessary for them to provide us with their professional services.
- Any recipient, if required to comply with the law or for a legitimate purpose such as to protect the rights and property of Lawson, our clients, and the public, and to detect and respond to suspected illegal activity and threats to the safety of any person or of our systems or services.
- With your consent and at your direction, as permitted by law.

D. Selling or Sharing of Personal Information

We do not sell Personal Information or share Personal Information with third parties for cross-context behavioral advertising and have not done so in the prior 12 months. We also do not knowingly share or sell the Personal Information of children under the age of 16, and have not done so in the prior 12 months.

II. SUMMARY OF CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED IN THE PRECEDING 12 MONTHS

In the preceding 12 months, we have collected the categories of Personal Information set forth in the table below. For details about the precise data points we collect, the categories of sources of such collection and the business and commercial purposes for the collection, please see **Collection and Use of Personal Information** and **Collection and Use of Sensitive Personal Information** in Sections I.A and I.B above. In the preceding 12 months, we have disclosed the following categories of Personal Information for business purposes to the following categories of recipients, which we also describe in greater detail in **Disclosing Your Personal Information** in Section I.C above:

Category of Personal Information	Business Purpose for Disclosure	Category of Recipients
Identifiers, such as name, postal address, unique personal identifier, online identifier, Internet Protocol address, date of birth, email address, Social Security number, driver's license number, passport number, or other similar identifiers.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Any Personal Information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)), such as name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, or medical information (collected only in connection with voluntary disclosure of disability status).	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Characteristics of protected classifications under California or federal law, such as race, color, sex (including pregnancy, sexual	We disclose this category of Personal Information to assist us in considering your	We may have disclosed this category of Personal Information with our service providers or contractors who provide services

Category of Personal Information	Business Purpose for Disclosure	Category of Recipients
orientation, or gender identity), national origin, citizenship status, age (40 or older), marital status, disability information, medical condition (collected only in connection with voluntary disclosure of disability status), or military or veteran status.	candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Internet or other electronic network activity information , such as browsing history, search history, and information regarding your interaction with us and our systems.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Geolocation data , such as your postal or business address.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection</u>	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf

Category of Personal Information	Business Purpose for Disclosure	Category of Recipients
	<u>and Use of Personal Information</u> in Section I.A above.	(including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Audio, electronic, visual, or similar information.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Professional or employment-related information , such as employment history, references, awards, qualifications, certificates, licenses, professional memberships, and any other information you choose to provide in your resumes and/or applications.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform,

Category of Personal Information	Business Purpose for Disclosure	Category of Recipients
		background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Education information , such as school name, degree, major and graduation date.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Sensitive Personal Information , such as account log-in; Social Security number, driver's license, state identification card, or passport number; racial or ethnic origin; citizenship or immigration status; union membership; or Personal Information collected and analyzed concerning health (collected only in connection with voluntary disclosure of disability status).	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> and <u>Collection and Use of Sensitive Personal Information</u> in Sections I.A and I.B. above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other

Category of Personal Information	Business Purpose for Disclosure	Category of Recipients
		communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Inferences drawn from any of the information processed.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.
Other , such as background check information, area of interest, how you heard about us, whether you would like to receive text messages, eligibility to work in the country of the job, sponsorship requirements, and whether you were referred by an employment agency or a Lawson or Kent employee.	We disclose this category of Personal Information to assist us in considering your candidacy and for human resources functions, including as described in <u>Collection and Use of Personal Information</u> in Section I.A above.	We may have disclosed this category of Personal Information with our service providers or contractors who provide services to us in relation to our human resources and business operations and process Personal Information on our behalf (including service providers for recruitment and talent management platform, business networking platform, background check services, compliance software, cloud storage, video and audio conferencing, email and other communications, and other IT

Category of Personal Information	Business Purpose for Disclosure	Category of Recipients
		and technical services) and other parties described in <u>Disclosing Your Personal Information</u> in Section I.C above.

Our prior 12-month practices are consistent with our current Personal Information handling practices described in **NOTICE AT COLLECTION** in Section I.

III. **YOUR PRIVACY RIGHTS**

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”), affords California residents certain rights with respect to their Personal Information, subject to certain exceptions. Subject to certain limitations you have the following rights:

- **(1) Right to Delete.** You have the right to request us to delete the Personal Information we have collected about you.
- **(2) Right to Correct.** You have the right to request us to correct inaccurate Personal Information we maintain about you.
- **(3) Right to Know and Access.** You have the right to know and access the Personal Information we have collected about you, 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 Personal Information and service providers, contractors and third parties to whom we disclosed Personal Information, and the specific pieces of Personal Information we have collected about you.
- **(4) Right to Data Portability.** You have the right to receive the information under right (3) in a format, to the extent technically feasible, that is portable, usable, and allows you to transmit the Personal Information to a person without impediment.
- **(5) Rights Related to Sharing for Cross-Context Behavioral Advertising or Sale.** We do not share your Personal Information for cross-context behavioral advertising or sell your Personal Information, within the context of your job application. As such, there is no need to exercise your opt out of sale or sharing right in connection with your job application. As we do not sell or share your personal information, we do not process opt-out preference signals.
- **(6) Rights Related to Sensitive Personal Information.** As described in **Collection and Use of Sensitive Personal Information** in Section I.B above, we only use your sensitive Personal Information for permitted purposes. As such, there is no need to exercise your right to limit the use or disclosure of sensitive Personal Information.
- **(7) Rights Related to Automated Decisionmaking Technology (“ADMT”).** Lawson does not use ADMT to make decisions that result in the provision or denial of financial or lending services, housing, education enrollment or opportunities, employment or independent contracting opportunities or compensation, or healthcare services. As such, there is no need to exercise opt-out and other rights related to ADMT.
- **(8) Right to No Discrimination.** You have the right not to be discriminated against for exercising any of your privacy rights. This includes us not: (a) denying you goods or services;

(b) charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (c) providing you a different level or quality of goods or services; (d) suggesting to you that you will receive a different price or rate for goods or services or a different level or quality of goods or services; and (e) retaliating against you for exercising your privacy rights.

You may exercise your privacy rights by calling 1-800-241-1381 or emailing us at recruiting@lawsonproducts.com. In some instances, we will need to verify your identity before honoring your privacy right request. We will verify your identity by asking you to provide Personal Information related to your recent interactions with us (e.g., the information you provided when applying for a position). We will honor your privacy rights request within 45 calendar days of receipt, unless we request an extension as permitted under the CCPA.

You may exercise your privacy rights through an authorized agent. If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, you may call us at 1-800-241-1381 or email us at recruiting@lawsonproducts.com.

IV. COMMUNICATIONS PREFERENCES

You may opt out of receiving text messages or promotional emails from Lawson by following the instructions in those communications. If you opt out, we may still send you non-promotional emails.

V. CONTACT US

If you have any questions about this Notice, or to request this Notice in another format, please contact recruiting@lawsonproducts.com.

VI. UPDATES

We may update this Notice from time to time. If we make changes, we will notify you by revising the date at the top of this policy. We may also provide you with an additional notice (such as by sending you a notification), in connection with making material changes to this Notice. We encourage you to review this Notice regularly to stay informed about our information practices and the choices available to you.