

Photronics Global Applicant Privacy Notice

Effective Date: October 9th 2026

1. Scope and Overview

The Photronics entity to which you apply and, where applicable, Photronics, Inc. are the controller(s) responsible for the processing described in this Notice (collectively, “Photronics,” “we,” “us,” or “our”). The relevant employing entity will be identified in the job posting, application portal, or other recruitment communication respect the privacy of job applicants and candidates. This Global Applicant Privacy Notice and Messaging Terms (“Notice”) explains how Photronics collects, uses, discloses, transfers, retains, and protects personal data and personal information during recruitment and hiring. It also governs optional recruiting text messages sent by or on behalf of Photronics.

This Notice applies to individuals who apply for employment with Photronics or otherwise participate in a Photronics recruitment process. Certain provisions apply only where required by the laws of the jurisdiction in which you reside, work, or apply. References to “personal data” include “personal information” where applicable.

We process personal data in accordance with applicable law and take reasonable steps to ensure that personal data is adequate, relevant, limited to what is necessary, accurate where required, and used for specified purposes.

2. Purposes for Collecting and Using Applicant Data

- Receiving, reviewing, and processing employment applications.
- Evaluating qualifications, skills, experience, and suitability for employment.
- Communicating with candidates through email, telephone, text messaging, applicant-tracking systems, and other recruiting channels, and scheduling interviews.
- Conducting interviews, assessments, reference checks, credential verification, and other selection activities.
- Maintaining records of recruiting and hiring decisions.
- Considering candidates for current or future employment opportunities, where permitted by law and, where required, with consent.
- Preparing employment offers and completing pre-employment and onboarding activities.
- Verifying identity, employment eligibility, work authorization, and immigration or sponsorship requirements.
- Conducting background checks, drug screenings, medical assessments, or other pre-employment screenings where relevant, authorized, and permitted by law.
- Providing reasonable accommodations during the application and interview process.

- Supporting equal employment opportunity, affirmative action, diversity, and legally required reporting.
- Arranging or reimbursing candidate travel and related expenses.
- Protecting Photronics personnel, systems, facilities, assets, confidential information, and business operations.
- Preventing fraud and maintaining network and information security.
- Complying with legal, regulatory, reporting, audit, and recordkeeping obligations.
- Establishing, exercising, or defending legal claims.

3. Categories of Applicant Data

- Contact and identification information, such as name, address, telephone number, email address, signature, date of birth, and other identifiers.
- Application and professional information, such as resumes, cover letters, employment history, job titles, responsibilities, compensation expectations, references, professional memberships, and work samples.
- Education and qualification information, such as degrees, schools attended, training, technical skills, professional licenses, certifications, and language capabilities.
- Recruitment and assessment information, such as interview notes, recruiter and interviewer evaluations, assessment results, candidate preferences, hiring recommendations, relocation preferences, and skill-testing results.
- Work authorization and immigration information, including right-to-work, visa, passport, residency, and sponsorship information where relevant.
- Internet or electronic activity associated with Photronics careers sites, applicant-tracking systems, recruiting communications, and related systems.
- Audio or visual information, such as information provided during video interviews or recorded assessments, and security information such as CCTV footage where used and permitted by law.
- Travel and expense information, including itinerary, accommodation, insurance, reimbursement, and related information.
- Financial information when required for recruitment, reimbursement, offer, or onboarding purposes.
- Demographic and equal employment opportunity information, where voluntarily provided or required or permitted by law.
- Accommodation, disability, or health information when relevant and lawfully collected.
- Background-screening information, including employment, education, criminal-record, motor-vehicle, or other screening information where lawful.
- Other information that you voluntarily provide or that Photronics otherwise lawfully obtains in connection with recruitment.

Please do not provide medical, genetic, financial account, Social Security number, governmental identification, or other highly sensitive information unless Photronics specifically requests it for a lawful recruitment, screening, or onboarding purpose.

4. Sources of Applicant Data

- Directly from you.
- Recruiters, staffing agencies, recruitment consultants, and executive-search firms.
- References, former employers, educational institutions, and credential-verification sources.
- Professional networking sites, job boards, and publicly available sources.
- Photronics careers sites, applicant-tracking systems, HR systems, assessments, and recruiting platforms.
- Photronics employees who refer candidates.
- Background-screening, drug-screening, identity-verification, and other service providers, where permitted by law.

5. Legal Bases for Processing

- Where applicable data-protection law requires a lawful basis, Photronics processes applicant data only where a permitted basis applies. The applicable legal basis depends on the specific purpose and processing activity. Photronics relies on the bases described below:
- Steps taken at your request before entering into an employment contract, and processing necessary to enter into or perform an employment contract, including processing your application, assessing your qualifications and taking steps necessary to enter into an employment contract.
- Compliance with a legal obligation applicable to Photronics, including complying with applicable employment and equality laws, and meeting other legal or regulatory requirements relating to the recruitment process.
- Photronics' or a third party's legitimate interests, in particular identifying and assessing suitable candidates, administering and improving recruitment, protecting systems and premises, preventing fraud, and establishing or defending legal claims, where those interests are not overridden by your interests, rights, or freedoms.
- Consent, where required or otherwise appropriate under applicable law; for the specific processing activity identified to you at the time your consent is requested. You may withdraw consent as described below.
- Vital interests, substantial public interest, or other lawful bases recognized by applicable law, where relevant.

Photronics will process personal data for the purposes for which it was collected or for compatible purposes. If Photronics proposes to use personal data for a materially different or incompatible purpose, it will provide additional notice and obtain consent where required by law.

6. Special Categories and Criminal-Offence Data

Certain jurisdictions provide heightened protection for data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for identification, health, sex life or sexual orientation, and criminal convictions or offences.

Photronics will process such data only where permitted by applicable law and where an applicable condition is satisfied. Photronics will not rely on ordinary legitimate interests alone as the legal basis for processing special-category data where Article 9 of the GDPR or equivalent law applies. Demographic or equal-employment information is generally maintained separately from ordinary hiring decision materials and is not used to make employment decisions except where permitted or required by law.

7. Automated Decision-Making and Profiling

Photronics does not make hiring decisions based solely on automated processing, including profiling, where the decision would produce legal effects or similarly significant effects on an applicant, unless permitted by applicable law and appropriate safeguards and notice are provided. If Photronics introduces such processing, it will provide any additional information and rights required by applicable law.

8. Disclosure and Service Providers

- Photronics subsidiaries, affiliates, and related entities where necessary for recruitment, HR administration, business operations, or legal compliance.
- Talent Acquisition personnel, HR representatives, hiring managers, interviewers, and other employees involved in recruitment.
- Service providers supporting applicant tracking, HR systems, hosting, communications, assessments, interviews, travel, immigration, background screening, drug screening, identity verification, and related recruitment activities.
- Professional advisers, auditors, insurers, and legal counsel.
- Government agencies, regulators, courts, law-enforcement authorities, emergency services, or other parties where required or permitted by law.
- Parties involved in a merger, acquisition, restructuring, financing, sale of assets, or similar corporate transaction, subject to appropriate safeguards.

Photronics requires service providers that process applicant data on its behalf to protect the information through appropriate contractual, technical, and organizational safeguards and to

process it only for authorized purposes and in accordance with Photonics' instructions, except where applicable law provides otherwise.

Photonics does not sell applicant personal information for monetary consideration and does not use or disclose sensitive applicant information for purposes unrelated to recruitment, employment, legal compliance, security, or other purposes permitted by applicable law.

9. Systems and International Data Transfers

Applicant data may be stored or processed through Photonics' applicant-tracking, HR, communications, and related systems, including iCIMS, Darwinbox, Twilio, and other service providers used for recruitment.

Because Photonics operates globally, applicant data may be accessed by or transferred to Photonics entities and service providers in countries other than the country in which you reside or applied for employment, including the United States. Some destination countries may not provide the same level of data protection as your home jurisdiction.

Where required, depending on the destination and recipient, Photonics relies on an adequacy decision, the EU Standard Contractual Clauses, the UK International Data Transfer Agreement or UK Addendum, the EU-U.S. Data Privacy Framework and, where applicable, the UK Extension, or another lawful transfer mechanism. For information or a copy regarding Photonics' commitments and safeguards for transfers from the European Economic Area and United Kingdom to the United States, review the Photonics EU-U.S. Data Privacy Framework Policy at <https://photronicsinc.gcs-web.com/static-files/90c23c00-bbe3-49ed-8f87-af718f8b3368>. You may also contact privacy@photronics.com regarding safeguards applicable to a particular transfer.

10. Data Retention

Photonics retains applicant data only for as long as reasonably necessary for the purposes for which it was collected, including to complete recruitment, consider candidates for current or future opportunities where permitted, comply with legal and recordkeeping obligations, resolve disputes, enforce agreements, and establish or defend legal claims.

Retention periods may vary by jurisdiction and category of data. In the United States, unless a longer period is required because of litigation, an investigation, a legal hold, an audit, or another legal obligation, Photonics generally retains unsuccessful candidate records for three years following the later of the application date or final recruiting activity.

For applicants in other jurisdictions, Photonics determines the applicable retention period taking into account the purpose for which the data was collected, the status and outcome of the application, whether the applicant is being considered for future opportunities, applicable legal and recordkeeping requirements, and relevant limitation periods. Applicant data may be retained

for longer where necessary for a legal hold, investigation, audit, statutory obligation, or the establishment, exercise, or defence of legal claims.

Information concerning individuals who become employees may be transferred to and retained as part of the employee's personnel or HR records. When Photronics no longer has a lawful purpose to retain identifiable applicant data, it will delete or anonymize the information in accordance with applicable law and Photronics' retention requirements.

11. Security

Photronics maintains reasonable administrative, technical, organizational, and physical safeguards designed to protect applicant data against unauthorized access, acquisition, disclosure, alteration, loss, misuse, or destruction. Access is limited to persons with an appropriate business or legal need. No information system or transmission method can be guaranteed to be completely secure.

12. Applicant Privacy Rights

- Request information about the personal data Photronics collects, uses, discloses, or transfers about you.
- Request access to or a copy of your personal data.
- Request correction of inaccurate or incomplete personal data.
- Request deletion or erasure of personal data.
- Request restriction of processing or object to certain processing.
- Request portability of personal data where applicable.
- Withdraw consent where processing is based on consent, without affecting the lawfulness of processing before withdrawal.
- Object to certain processing based on legitimate interests where applicable.
- Exercise applicable privacy rights without unlawful discrimination or retaliation.
- Lodge a complaint with the competent data-protection or supervisory authority where applicable.

These rights are subject to applicable legal limitations and exceptions. Photronics may retain information necessary to comply with legal obligations, establish or defend legal claims, maintain security, or fulfill another lawful purpose. Photronics may need to verify your identity and, where applicable, the authority of an agent acting on your behalf before completing a request.

To exercise applicable rights or ask questions about applicant privacy, contact privacy@photronics.com or the Photronics Corporate Legal Department at the address below.

13. U.S. Background Checks and Employment Records

If Photronics obtains a background report from a third-party consumer reporting agency in the United States, Photronics will provide any disclosures and obtain any authorizations required under the federal Fair Credit Reporting Act and applicable state or local law. Any required FCRA disclosure and authorization will be provided separately and is not incorporated into this Notice.

14. Personal Data About Other Individuals

If you provide personal data about a reference, referral, emergency contact, family member, or another individual, you should provide that information only where you are authorized to do so. Where required by law, you are responsible for informing the individual that Photronics may collect and use the information for recruitment or employment-related purposes.

15. Voluntary Provision of Information

You may choose whether to provide personal data to Photronics. However, certain information is necessary to evaluate your qualifications, process your application, comply with legal obligations, or complete required pre-employment activities. If you do not provide required information, Photronics may be unable to process your application or consider you for employment.

17. Changes to This Notice

Photronics may update this Notice periodically to reflect changes in its recruitment practices, messaging program, systems, legal obligations, or applicable privacy requirements. Updated terms will be posted on a publicly accessible webpage with a revised effective date. Material changes to the messaging terms will be communicated through an appropriate channel and, where required by applicable law, will be subject to any additional notice or acceptance requirements. If Photronics intends to use previously collected personal data for a materially different or incompatible purpose, it will provide additional notice and obtain consent where required by law.

18. Contact Information

If you have questions about this Notice, wish to exercise your privacy rights, or would like additional information regarding the processing of your personal data, please contact Photronics using the details below.

Photronics, Inc.

Attention: Corporate Legal Department

15 Secor Road

Brookfield, Connecticut 06804

United States

Email: privacy@photronics.com

Telephone: (203) 740-5601