

## California Applicant/Employee Privacy Notice

IPG Photonics Corporation (“**IPG**” or “**we**”) is committed to protecting the privacy of personal information of our current and former employees, job applicants, officers and directors (collectively, “**Employees**”), contractors and agents (together with Employees, “**Personnel**”) and their emergency contacts and beneficiaries in connection with its human resources activities.

This California Applicant/Employee Privacy Notice (“**Notice**”) describes the categories of personal information IPG has collected about California Personnel and their emergency contacts and beneficiaries, how it used that personal information, and whether IPG disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months.

### Categories of Personal Information Collected and Disclosed

The CCPA provides California residents with the right to know (1) what categories of personal information IPG has collected about them, during the preceding 12 months; (2) the categories of sources from which the personal information is collected; (3) the business or commercial purposes for collecting, selling or sharing personal information; (4) the categories of third parties to whom personal information is disclosed; (5) the categories of personal information sold or shared for purposes of cross-context behavioral advertising in the preceding 12 months; (6) the categories of personal information disclosed for business purposes in the preceding 12 months; and (7) a description of CPRA rights and how to exercise those rights. California residents can find this information below:

<b>Category of Personal Information Collected by IPG</b>	<b>Category of Third Parties Information is Disclosed to for a Business Purpose</b>
<b>Identifiers and Contact Information</b>  Name, postal address, dates of birth, phone numbers, email address	<ul style="list-style-type: none"><li>• Service providers</li><li>• Government entities</li></ul>
<b>Records identified by state law (including the California Customer Records statute (Cal. Civ. Code § 1798.80(e)))</b>  Bank account information, insurance policy number, health insurance information, pay rate, payroll deduction information.	<ul style="list-style-type: none"><li>• Service providers</li></ul>
<b>Protected classification characteristics under California or federal law</b>  Age (over 40), equality and diversity information, such as minority, veteran and disability status, through voluntary self-disclosure and other means to implement, health and safety information to maintain a safe workplace, information necessary for benefits enrollment and administration purposes.	<ul style="list-style-type: none"><li>• Service providers</li></ul>

<b>Category of Personal Information Collected by IPG</b>	<b>Category of Third Parties Information is Disclosed to for a Business Purpose</b>
<p><b>Commercial information</b></p> <p>Business expenses submitted for reimbursement</p>	<ul style="list-style-type: none"> <li>• Service providers</li> </ul>
<p><b>Internet or other electronic network activity</b></p> <p>Interaction with websites on IPG’s corporate network, including browsing and search history.</p>	<ul style="list-style-type: none"> <li>• Service providers</li> </ul>
<p><b>Sensory data</b></p> <p>Audio, electronic, visual, thermal or similar information of Personnel through photographs and safety and security systems</p>	<ul style="list-style-type: none"> <li>• Service providers</li> </ul>
<p><b>Professional or employment-related information</b></p> <p>Information submitted with employment applications including employment history, employment recommendations; background check and criminal history; work authorization; fitness for duty data and reports, if applicable; travel information and information regarding close contacts; performance and disciplinary records; compensation data; benefit plan enrollment, participation, and claims information; leave of absence information including religious and family obligations.</p>	<ul style="list-style-type: none"> <li>• Service providers</li> </ul>
<p><b>Education information</b> (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</p> <p>Education information such as transcripts and education records.</p>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Public (names and dates of schools attended, awards and honors won, and degrees awarded may be included on IPG’s website and marketing materials)</li> </ul>
<p><b>Personal Data about children under the age of 16</b></p> <p>Personal information about Employees’ dependents</p>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>

**Category of Personal Information Collected by IPG**

**Category of Third Parties Information is Disclosed to for a Business Purpose**

under the age of 16 if Employees voluntarily provide such information in connection with the enrollment and administration of benefits and other human resource purposes that involve such dependents.

**Category of Sensitive Personal Information Collected by IPG**

**Category of Third Parties Information is Disclosed to for a Business Purpose**

**Personal information that reveals Personnel’s social security, driver’s license, state identification card, or passport number**

Social security number, Driver’s license number, passport number or other similar identifiers

- Service providers
- Government entities

**Financial Information**

Bank account number for payroll, other financial information

- Service providers

**Communications**

Contents of email and other communications using IPG’s Internet and telecommunications systems and devices

- Service providers

**Geolocation Information**

GPS location data from IPG-issued mobile devices and, if applicable, IPG-owned vehicles.

- Service Providers

**Health Information**

Symptoms and other indicators of exposure to the

- Service Providers

**Category of Sensitive Personal Information  
Collected by IPG**

**Category of Third Parties Information is  
Disclosed to for a Business Purpose**

coronavirus, COVID-19; physical and mental health data concerning employee and their family members; medical claims information

**Sources From Which Personal Information is Collected**

IPG may collect your personal information from the following sources:

- Directly from you or someone providing personal information on your behalf.
- Automatically through your use of IPG property, equipment, systems, or applications.
- From third-party sources.
- As otherwise permitted by applicable law.

**Purposes Personal Information of California Personnel is Used**

- Collecting and processing employment applications, including confirming eligibility for employment, background and related checks, checks regarding fitness for duty, onboarding, and related recruiting efforts
- Processing payroll and employee benefit plan, including bonuses and long-term incentive administration, stock plan administration, compensation analysis, program design and administration, such as enrollment and claims handling, leave of absence administration, overtime and compliance with labor laws, and company recognition programs
- Maintaining personnel records and record retention requirements
- Communicating with employees and/or employees' emergency contacts and plan beneficiaries
- Complying with applicable state and federal health, labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations
- Preventing unauthorized access to, use, or disclosure/removal of IPG's property, including IPG's information systems, electronic devices, network, and data
- Ensuring and enhancing employee productivity and compliance with IPG's policies
- Investigating complaints, grievances, and suspected violations of IPG policy
- Measuring IPG's progress toward IPG's diversity and inclusion goals
- Facilitating the efficient and secure use of IPG's information systems
- Ensuring compliance with IPG information systems policies and procedures
- Improving safety of employees, customers and the public with regard to use of IPG property and equipment
- Improving efficiency, logistics, and supply chain management

- Improving accuracy of time management systems
- Evaluating an individual's appropriateness for a new position at IPG, or promotion to a new position
- Engaging customers and other legitimate business purposes
- Managing workflow, including assigning, managing and administering projects
- Planning for organizational development and succession
- Internal or external audits
- Litigation evaluation, prosecution, and defense
- Diversity and inclusion initiatives
- Restructuring, relocation, acquisitions, divestitures, and integrations
- Otherwise, as you agree or consent, in accordance with the law

### **Disclosure of Personal Information**

IPG may share personal information, as described in this Notice or with your permission, to carry out the purposes outlined above. IPG may share information with third parties, such as background check vendors, third-party human resources and information technology vendors, outside legal counsel, and state or federal governmental agencies. IPG may add to the categories of personal information it collects and the purposes it uses personal information and will notify you of material changes to this Notice. The categories of third parties with whom we may share your personal information includes:

Vendors and Service Providers. We may share personal information with vendors and service providers.

Customers and Business Partners. Personal information may be shared with IPG's customers and business partners in order to facilitate the development, operation, and maintenance of IPG's business.

Building Management and Security. In some cases, we are required to share personal information with building management and/or security at IPG properties to facilitate your access to the building.

Affiliates. IPG may share personal information with our affiliates.

Disclosures to Other Personnel. In certain cases, your personal information may be shared with or otherwise made available to other Personnel. For example, when you post content to intra- IPG applications (e.g., Jabber, Teams or similar services), other Personnel may be able to see some information about you, such as your name and/or picture in addition to the content you post.

Disclosures to Protect Us or Others. We may access, preserve, and disclose your personal information if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal processes, such as court orders or subpoenas; (ii) protect your, our, or others' rights, property, or safety; (iii) enforce our policies or contracts; (iv) collect amounts owed to us; or (v) assist with an investigation or prosecution of suspected or actual illegal activity.

Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of IPG assets, or transition of service to another entity, then your personal information may be transferred as part of such a transaction as permitted by law and/or contract.

### **Your Privacy Rights**

Under the CCPA, California residents have the right to:

- Know Whether IPG is Processing personal information About Them (Right to Know);
- Request Access to and Portability of personal information, including: (i) obtaining access to or a copy of your personal

information; and (ii) obtaining an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the “right of data portability”);

- Request Correction of personal information; and
- Request Deletion of personal information.

IPG takes reasonable steps to ensure that your Personal Information is accurate, complete and current. IPG reserves the right to maintain any personal information that it is required to keep or maintain for compliance purposes or to protect itself or preserve its legal rights under pending, threatened or potential legal action. IPG Personnel may review and correct his or her data in ADP at any time. All Personnel are asked to inform the Human Resources department, or his or her manager, immediately in the event of changes in personal information.

If you would like to exercise any of your rights under the CCPA, please contact us as set forth below. We will process such requests in accordance with applicable laws.

### **Retention**

IPG retains the personal information only for as long as it serves the purpose of the processing or as required or permitted under applicable laws. To determine the appropriate retention period for personal information, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means.

**Disclosure Regarding Sensitive Personal Information.** IPG only uses and discloses [sensitive personal information](#) for the following purposes:

- To perform the HR functions set forth in this Notice.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at IPG and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- To verify or maintain the quality or safety of IPG products, services, or devices, and to improve, upgrade, or enhance IPG’s services or devices.
- For purposes that do not infer characteristics about individuals.

**Non-Discrimination.** California residents have the right not to receive discriminatory treatment by IPG for the exercise of their rights conferred by the CCPA.

**Verification.** To protect your privacy, we will take steps to reasonably verify your identity before fulfilling requests submitted under the CCPA. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Examples of our verification process may include asking you to provide the email and postal addresses we have associated with you, asking you to verify various types of information you provided to us or other reasonable means of ensuring your identity.

**Authorized Agent.** Only you, or someone legally authorized 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. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth below for additional instructions.

**Disclosure Regarding Opt-Out Preference Signals.** IPG does not “sell” personal information or “share” personal information for “cross-context behavioral advertising” so it does not respond to opt-out preference signals.

**Contact For Questions**

If you have any questions or concerns regarding this Notice or if you would like to exercise any of your rights under the CCPA, please contact:

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50 Old Webster Road  
Oxford, MA 01540

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1-833-500-1423