

Privacy Notice for Partners, Suppliers & Other Third Parties

Effective Date: 15 January 2024

This Privacy Notice (“Notice”) describes how Fluor collects, uses, and discloses personal information about you, as a Fluor business or contracting partner, supplier, or other related third party in the course of our business dealings with you or in the general course of our business.

A reference to “Fluor,” “we,” “us” or “our” is a reference to Fluor or its applicable affiliate, as the case may be, which is involved in the collection, use, disclosure, or other processing of personal information.

Identity of Controller and Contact Details

The company that is primarily responsible for the collection and processing of your personal information will be the local Fluor company with whom you directly transact business. In some cases, Fluor will act as a “joint controller” with that entity, sharing responsibility for collecting and processing your personal information, including sharing responsibility to make sure that your data is handled safely and securely.

In some cases, a specific joint venture or other partnering arrangement may provide a separate privacy policy, in which case that privacy policy will not conflict with this Policy. Please consult the applicable project information manager, or use the contact details listed below, should you have any questions in connection with any such specific arrangement.

The contact details for Fluor, and its local company offices and other locations, may be found through its website, www.fluor.com/about-fluor/locations. If you require further information about privacy and data protection, you may contact us as detailed below.

Categories of Information We Collect About You

Personal information is data that identifies, relates to, describes, can be used to contact, or could reasonably be linked directly or indirectly to you.

We may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfillment of these obligations.

Information We Collect Directly From You. Subject to local law, we may collect the following categories of personal information directly from you, including when you access a Fluor job site/facility or Fluor computing environment:

- **Identifiers:** Such as your name and account credentials.
- **Contact information:** Such as your business/personal address, email address, phone number, etc..
- **Audio, electronic, visual, or similar information:** Such as photographs, photographs taken in the workplace or CCTV footage.
- **Sensitive personal information,** as described below.

Primarily, we collect business contact information, although in some cases we may receive personal contact information, such as a personal address or cell phone number (especially for smaller businesses or if personal contact information is used for business purposes).

We collect the following categories of personal information about you directly from you, which may be considered sensitive in some jurisdictions:

- **Geolocation data:** Such as the precise physical location of your device.
- **Biometric information:** Such as fingerprint or retina scans used for property access and for the purposes of authenticating your identity.

Information We Collect from Third Parties. Subject to local law, we sometimes collect certain information about you from third parties, including your employer, background check providers, government agencies, and other related sources.

We collect the following categories of personal information about you from third parties:

- **Identifiers:** Such as your name.
- **Contact information:** Such as your business/personal address, email address, phone number, etc.
- **Skills and Experience:** For the purposes of client approval of contractor placements on project.

In some cases, Fluor might collect publicly available personal information from a company website, or from social media platforms, such as LinkedIn.

Information We Collect Automatically. Subject to local law, we automatically collect personal information when you access Fluor websites, including our OneFluor site and other collaboration tools, using cookies, pixel tags, or similar technologies. Please review our *Cookie Policy* and *Privacy policy for OneFluor site and Collaboration tools* for additional information regarding the use of cookies.

We collect the following categories of personal information about you automatically through our websites:

- **Identifiers:** Such as your IP address, usernames and passwords.
- **Internet and other electronic network activity:** Internet or other electronic network activity information, including browser type and operating system; browsing history, clickstream data, search history, and information regarding your interaction with an internet website, application, including access logs and other activity information related to your use of the Fluor website; the length of time you visit the Fluor website; and the referring URL, or the website that led you to the Fluor website.

How We Use Your Information and The Basis on Which We Use It

Subject to local law, we use the categories of personal information described above for the following business purposes:

- **For business administration purposes,** including for routine or special business transactions with you, such as contract pursuit or administration, the general conduct of our business, and the pursuit or mutual pursuit and/or carrying out of business opportunities with you; to comply with our record-keeping obligations, audit, etc.; and to arrange systems and building access.

- To **communicate with you** and to respond to your inquiries, including sending periodic updates.
- **For identification and authentication purposes.** For example, when you access a Fluor job site, we may use your biometric information to verify your identity; and if you enter your login ID and password to enter one of our login portals, we use your credentials and password for authentication purposes.
- To **comply with our legal obligations** or exercise or defend our rights or the rights of a third party, including complying with law enforcement or government authority requests and participating in compliance audits.
- Where we believe necessary, to investigate, prevent or take action regarding **suspected or actual illegal activities**, fraud, situations involving potential threats to the safety of any person or to otherwise enforce this Policy.
- **Deidentified data.** We may also deidentify or anonymize your data in such a way that you may not reasonably be re-identified by us or another party, and we may use this deidentified data for any purpose. To the extent we deidentify any data originally based on personal information, we will maintain and use such data in deidentified form and will not attempt to reidentify the data.

Our legal bases for processing your information are as follows:

- **Performance of a contract:** We process personal information where necessary for the performance of our contractual obligations to you, where we have a contract or prospective contract with you.
- **Compliance with legal obligations:** We process personal information where necessary to comply with the legal obligations to which Fluor is subject, for example, to cooperate with public and government authorities, courts or regulators in accordance with our legal obligations, to the extent this requires the processing or disclosure of personal information to protect our rights.
- **Legitimate Interests:** We process your personal information where necessary to serve our legitimate business interests, for example, to ensure that we can effectively manage and communicate regarding our business operations and activities, to assure site safety and security, to perform investigations or compliance audits, to improve our services, to exercise or defend our rights, and for business administration purposes. When we use personal information to meet our legitimate interests, we take steps to ensure that your rights are not infringed. You can contact us using the details in the “Contact Us” section below for more information about the steps we take to ensure these rights are not infringed.
- **Consent:** Where required by applicable law, we process personal information on the basis of your consent, for example, to send you direct marketing communications. To the extent we obtain your consent to process your personal information, you may have the right to withdraw your consent under applicable local law. To exercise this right, please contact us using the details in the “Contact Us” section of this Policy.

How We Disclose the Information We Collect

We may disclose each of the categories of personal information described above for our business purposes as follows:

- **Affiliates.** We may disclose the personal information we collect about you to our subsidiaries, affiliated entities, or joint venture or consortium partners, and their use and disclosure of your personal information will be subject to this Notice.
- **Service Providers.** We disclose the personal information we collect about you to service providers, contractors, and agents who perform functions and business operations on our

behalf or directly to you, for the purposes set out above. For example, we may engage IT service providers or business contact information management service providers, or vendors to help us manage our relationship with you.

- **Business Transfers.** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected about you to the other company. As part of the business transfer process, we may disclose certain of your information with lenders, auditors, and third party advisors, including attorneys and consultants.
- **In Response to Legal Process.** We may disclose your personal information to comply with the law, a judicial or administrative proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We disclose your personal information where we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Service or this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and De-Identified Information.** We may disclose aggregate, anonymized, or de-identified information about you for any purpose permitted under applicable local law.
- **Clients.** For the purpose of manpower management, site administration and project staffing, information may be disclosed to better assign and manage resources on projects.
- **Consent.** We may also disclose your personal information with your consent.

In the preceding twelve (12) months, Fluor has disclosed personal information for the business purposes described above to the following categories of recipients:

Category of Personal Information	Disclosure of Personal Information
Identifiers: Such as your name and account credentials for access to systems and services.	Affiliates, Clients, Service Providers
Contact information: Such as your business/personal address, email address, phone number and similar contact details for performing business transactions.	Affiliates, Clients, Service Providers
Audio, electronic, visual, or similar information: Such as professional photographs, photographs taken in the workplace or CCTV footage for site access.	Affiliates, Clients, Service Providers
Information regarding precise geolocation: When used for Health and Safety purposes on project sites.	Affiliates, Clients, Service Providers
Biometric information: Such as fingerprint or retina scans used for property access and for the purposes of authenticating your identity.	Affiliates, Clients, Service Providers

Skills and Experience: For the purposes of client approval of Contractor placements on project.	Affiliates, Clients
Website & Collaboration Tools: <ul style="list-style-type: none"> • Identifiers: Such as your IP address. • Internet and other electronic network activity: Internet or other electronic network activity information, including browser type and operating system; browsing history, clickstream data, search history, and information regarding your interaction with an internet website, application, including access logs and other activity information related to your use of the Fluor website; the length of time you visit the Fluor website; and the referring URL, or the website that led you to the Fluor website 	Service Providers. We disclose the personal information we collect about you to service providers, contractors, and agents who perform functions and business operations on our behalf, and in the administration of our websites.

Please note that we may also disclose any or all of the categories of information listed above in the event of a sale or transfer of all or part of our business, in response to legal process, or in the interests of protecting rights or safety, as described in more detail above.

Your Choices and Rights

You may have certain rights regarding our processing of your personal information under applicable local law. Depending on the jurisdiction in which you live, these may include rights to:

- request information about our processing of your information.
- request a copy of your personal information.
- rectify, correct, or update the information we hold about you.
- request deletion of your information.
- opt out of “sales” of personal information or “sharing” of personal information for cross-context behavioral advertising purposes (as these terms are defined under applicable law).
- opt out of certain profiling activities.
- restrict or limit our use of your information.
- object to our use of your information.
- ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances (referred to as data portability).
- where you have provided consent, withdraw such consent to our processing of your personal information at any time.
- not be unlawfully discriminated against for exercising your rights.
- lodge a complaint with your local data protection authority.

These rights may be limited or denied in some circumstances. For example, we may retain your personal information where required or permitted by applicable law. We do not “sell” or “share” the personal information described in this Notice (as those terms are defined under applicable local law).

We do not use or disclose your sensitive personal information for purposes other than permitted under applicable law.

Where legally required and pursuant to company policy the company will respond to data subject rights requests. To exercise your data subject rights under applicable local law you may contact us at 1-833-443-5687 or using the contact details provided in the “Contact Us” section below. We may request that you or your authorized agent provide information such as your email address, name, date of submission, relationship to us, and the nature of your request so that we can verify your identity. Authorized agents may also be required to provide a copy of the consumer’s signed permission authorizing the agent to submit requests on the consumer’s behalf. We will not discriminate against you if you choose to exercise your privacy rights.

Retention

Your personal information will be held for only so long as it is needed for Fluor’s business purposes as described above, and in accordance with applicable law and corporate document retention schedules. These schedules are designed to comply with applicable data privacy and other legislation, and to assist Fluor in maintaining business records which it may need to conduct its business and to respond to lawful requests for information in connection with legal claims or disputes. If you require any information about the periods for which Fluor will hold your personal information please contact us as detailed below.

Security of My Information

We implement physical, technical, and organizational security measures designed to safeguard personal information. These measures are aimed to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

International Transfers

Your personal information may be transferred to, stored or otherwise processed in servers and databases located outside of the jurisdiction in which you reside and where the privacy laws may not be as protective as your jurisdiction of residence. Where legally required, we have put in place appropriate safeguards, including the [Fluor Data Protection Binding Corporate Rules Policies \(EU and UK\)](#) and contractual commitments (as applicable) to protect your personal information.

For more information on the appropriate safeguards in place or to obtain a copy of these safeguards, please contact us through the information provided in the “Contact Us” section below.

Contact Us

Fluor is the controller of your personal information. If you have questions in connection with this Policy or would like to make a complaint, please contact our Privacy Office at:

Privacy Office
6700 Las Colinas Blvd.

Irving, TX 75039 USA
469-398-7000
chief.privacy.officer@fluor.com.

Changes to this Policy

This policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our website. If we make any changes to this Policy that materially affect our practices with regard to the information we have previously collected about you, we will endeavor to provide you with notice in advance of such change and/or by highlighting the change on our website.