

PAE CONSULTING ENGINEERS, INC. PRIVACY POLICY

POLICY EFFECTIVE DATE: 23.01.06

OVERVIEW

This policy describes the types of information PAE Consulting Engineers, Inc. and Luma Lighting Design (collectively “PAE”) may collect from you or that you may provide when you visit our websites (www.pae-engineers.com and www.lumald.com, collectively referred to after this as the “Sites”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This policy applies to information we collect:

- On this website
- Through third party service providers
- In email, text, or other electronic messages between you and PAE as it pertains to this website and its functions

Protecting your private information is our priority. By using any of our Sites you consent to the data practices described in this statement.

COLLECTION OF YOUR PERSONAL INFORMATION

INFORMATION YOU PROVIDE DIRECTLY

PAE collects information that you provide to us directly, including when you contact us via email, apply for a job, or work with PAE as a vendor or client. We may collect the information listed below from you as part of this process.

INFORMATION WE COLLECT AUTOMATICALLY

Usage Data is collected automatically when using our Sites. Our Sites automatically log information about your use of and visits to them, including through the use of cookies, web beacons, and similar technologies to help personalize your experience on the Sites and to analyze web traffic.

Usage Data may include information such as your Device’s Internet Protocol Address (e.g. IP Address), mobile device unique ID, browser type or mobile operating system, browser version, the pages of our Sites that you visited, the time and date of your visit, the time spent on those pages, unique device identifiers, and other diagnostic data.

INFORMATION FROM THIRD PARTIES

PAE may receive additional information about you from other publicly and commercially available sources, as permitted by law. We may combine all of the information we collect or receive about you and use or disclose it in the manner set forth in this Privacy Policy.

While using our Sites or engaging with PAE’s offered services, we may ask you to provide us with certain personally identifiable information as described above and below. These data points may include, but are not limited to:

- Name

- Title
- Contact Details (email, phone number, business address, etc.)
- Company name
- Communications (email, text, and voicemails) between PAE and you
- Payment details for any clients or vendors (checking account details, credit card details, wire details, etc.)
- Tax ID number for any clients or vendors
- Voluntary disclosures of race, ethnicity, and veteran status
- Usage data

PRIVACY COMPLIANCE AND LEGAL BASIS FOR PROCESSING

PAE may process personal data as long as one of the following reasons has been met:

- The Data Subject (You) have given consent to the processing.
- Processing is necessary for performance of a contract between PAE and the Data Subject (You).
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary to protect the Data Subject's (Your) vital interests.
- Processing is necessary in order to protect a public interest or exercise official authority.
- Processing is necessary for the purpose of legitimate interests, so long as fundamental rights and freedoms aren't infringed.

For PAE's safety and security, we may use information about you to verify accounts and activity, to monitor suspicious or fraudulent activity, and to identify violations of policies and contracts. Where required by law or where we believe it is necessary to protect our legal rights, interests, and the interests of others, we may use your information in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger, or sale of a business. With your consent, PAE may use information for specific purposes not listed above. For example, PAE may publish testimonials or featured client stories to promote our services with client permission.

USE AND RETENTION OF YOUR PERSONAL DATA

PAE collects and uses personal data to manage your relationship with PAE and our Sites. We may use or disclose the personal data we collect for one or more of the following purposes:

- For internal analysis to help us improve our services
- To send marketing to business contacts regarding our services which may be of interest and to promote PAE as a business and brand
- To perform our obligations or exercise our contractual rights
- It is necessary to comply with applicable laws or regulations
- To administer PAEs websites
- To enable access to our Sites across devices
- To personalize your experiences across PAE Sites
- To provide more customized client service

Where PAE collects and uses information for business purposes, a viable business purpose will only apply when PAE considers that a client's personal interests or personal information rights do not override our legitimate interests.

PAE will retain personal data for no longer than necessary. The length of time we retain it will depend on any legal obligations we have (such as tax recording purposes), the nature of any contracts in place with you, the existence of your consent, or our legitimate interests as a business.

SHARING YOUR INFORMATION

PAE may disclose personal data with third parties as follows:

- To PAE owned or operated companies to process the data for any of the mentioned purposes as outlined in this policy.
- When we have your consent to do so for other purposes.
- To third parties who work on our behalf to service or maintain business contact databases or other IT systems, e.g., suppliers of the IT systems we use to process personal information, or who provide other technical services to PAE.
- To third parties providing services to us or on our behalf who have a need to access the information, e.g., our professional advisors such as auditors and lawyers.
- To comply with applicable federal and state laws, protect PAE's rights, safety and property, and respond to lawful requests from public authorities.
- Subject to applicable law, in the event that PAE is merged, sold, or in the event of a transfer of some or all of PAE's assets (including bankruptcy), or in the event of another corporate change that would require review of such data.

Additionally, PAE may share personal data if we anonymize and/or aggregate it as, in these circumstances, the information ceases to be identified as personal.

In the event of testing PAE information or data with a current or potential vendor, information must be approved for release by the CFO and CIO and a data privacy and non-disclosure agreement must be completed.

SALE OF PERSONAL INFORMATION

At present, PAE does not sell, rent, or lease personal information for any purposes.

INTERNATIONAL TRANSFERS

Your information, including Personal Data, is processed at PAE's operating offices and in any other places where the parties involved in the processing are located. If you are accessing this website from within the European Economic Area (EEA) this will involve transferring your data outside the EEA.

Similarly, while PAE is not a global company, on occasion, PAE does pursue work in foreign countries for US based clients. These clients may require us to transfer personal information to parties outside the US.

PAE will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfers of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information. In the event that, PAE needs to transfer data we have collected to a third party located in a country outside of the EEA or the United States, PAE will continue to comply with the storage and usage of personal data as outlined in this Privacy Policy. Please be aware that countries outside of the EEA, may not have the same level of data protection that PAE maintains. By using our Sites or working with PAE, you consent to the transfer of your personal data within the limits set forth herein.

PROTECTION OF INFORMATION

As part of our personal data collection and storage, we have implemented administrative, technical, and physical security measures to help prevent unauthorized access. Despite these measures, no data transmission over Internet servers can be considered entirely secure, and therefore we cannot guarantee or warrant the security of any information transmitted between you and PAE via our Sites, communications, or applications.

Please note, it is your responsibility for maintaining the security of credentials used to access any PAE service, account, or PAE owned equipment. Additionally, it is your responsibility to report suspected unauthorized activity to us.

PAE makes reasonable efforts to restrict access to information to only those employees, agents, and contractors who need such access in order to operate, develop, improve, or deliver our programs, products, and services.

LIMITATION OF LIABILITY

PAE will not be liable to any third party with respect to any of the materials contained in this website, nor any use of or reliance on such materials by any third party. Furthermore, PAE will not be liable for any damages (including special or consequential damages) or injury caused by any failure to perform, any error, omission, interruption, defect, delay in operation of transmission, computer virus, communication line failure, theft or destruction, or unauthorized access to or alteration of, this website, or the materials in it. The foregoing limitation of liability is subject to applicable law.

COPYRIGHT

In using PAE's Sites, you agree that the content hereof (including graphics, photos, images, and written material) is provided by PAE, and that as between PAE and you, PAE owns the content of PAE's Sites. The content on our Sites is protected by copyrights, trademark, and other proprietary rights. By using our Sites, you acknowledge that these rights are valid, and that your use of the content on our Sites is governed by applicable copyright, trademark, and other intellectual property laws. All material and images may not be reproduced without written permission of the Sites' owners.

RECORDED COMMUNICATIONS WITH PAE

PAE frequently maintains written communications for internal business purposes. Examples of written communications that may be maintained are:

- Emails regarding project startups
- Communications between staff and clients
- Emails regarding vendor terms, negotiations, or billing

PAE may ask to record calls or meetings for record keeping training or research purposes. All recordings will be treated as confidential. If you do not wish to have a meeting or call recorded, you will be given a chance to opt out. If the call is already in progress, you may ask PAE to turn off the recording at the start of the call or meeting.

YOUR RIGHTS AND CHOICES

Applicable law may provide you with specific rights regarding your personal data. This section describes those potentially applicable rights as defined if you reside in the EEA, California, Nevada, Colorado, Virginia, or Utah.

OPT OUT DISCLOSURE

You may choose to opt out of having certain personal data collected or stored by submitting a written request to privacy@pae-engineers.com. In certain circumstances, if personal information is not provided, PAE will be not be able to perform its contractual obligations or provide you with services. When this is the case, PAE will make it clear.

RIGHT TO KNOW AND DATA PORTABILITY

You may have the right to request that PAE disclose certain information to you about our collection and use of your personal data over the past twelve (12) months (the “right to know”). Once we receive your request and confirm your identity, we will disclose to you:

- The categories of personal data we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or disclosing that personal information.
- The categories of third parties with whom we share that personal data.
- The specific pieces of personal information we collected about you.
- If we disclosed your information for a business purpose, we will also disclose to you the categories of personal information that were disclosed.

RIGHT TO DELETION

You may have the right to request the deletion of your personal data, subject to certain exceptions (the “right to delete”). Once we receive and confirm your request and identity, we will review your request to see if an exception allows us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which PAE collected your personal information, provide you with a service that was requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activities, or prosecute those responsible for such activities
- Debug products to identify and repair errors that impair existing intended functionality
- Exercise free speech, ensure the right of another client to exercise their free speech rights, or exercise another right provided by law
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. Seq)
- Comply with any other local, state, or federal laws
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us

- Comply with an existing legal obligation

RIGHT OF NON-DISCRIMINATION

You have the right to not be discriminated against for exercising any of your consumer rights. This includes discrimination in the form of:

- Denying goods or services to you.
- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties.
- Providing or suggesting the provision of a different level or quality of service to you.

EXERCISING YOUR RIGHTS

In order to exercise any of your rights as listed above, you may contact us by email at privacy@pae-engineers.com.

LINKS TO OTHER WEBSITES AND THIRD PARTIES

PAE's Sites or provided materials may contain links or references to third-party owned or operated websites or online services. PAE is not responsible for the collection of personal data or the security or privacy of any such information as it is shared or used by such third-party provides or their services. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

Likewise, PAE is not responsible for the collection, use, and disclosure policies and practices (including the data security practices) of any other developer, app provider, social media platform, operating system provider, wireless service provider or device manufacturers, including with respect to any personal data you disclose to such other organizations through or in connection with PAE's Sites, social media pages, applications, widgets, or any mobile features.

COOKIES, WEB BEACONS, AND SIMILAR TECHNOLOGY

A Cookie is a small text file which includes a unique identifier that is sent by a web server to the browser on your computer, mobile device, or any other internet enabled device when you visit our Sites. Cookies and similar technologies are used to make our Sites work efficiently and to collect information about your online preferences.

Certain sections of our Sites and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, tags, or pixels) that allow us count the number of users who have visited our Sites and their pages.

PAE also includes web beacons in our email messages or newsletters to track whether you've opened the message and to count number of readers. We use this information to help improve and customize our services and to measure the overall effectiveness of our content and Sites.

DO NOT TRACK SIGNAL

PAE's Sites do not respond to Do Not Track signals. Some web browsers may transmit Do Not Track signals to the websites with which the user communicates. At present, PAE's Sites do not respond to Do Not Track signals and we do not currently take any action in response to such signals. If an industry

standard on responding to such signals is established and accepted, we may reassess how we respond to these signals in the future.

YOUR STATE SPECIFIC PRIVACY RIGHTS

If you are a California, Nevada, Colorado, Virginia, or Utah resident, your state's laws may provide you with additional rights regarding our use of your personal information.

Nevada residents have the right to opt-out of the sale of the personal information under Nevada Revised Statutes Chapter 603A. However, please know we DO NOT sell data triggering that statute's opt-out requirements.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. However, please know we DO NOT disclose personal information to third parties for their direct marketing purposes.

California law provides additional rights for California residents. If you are a California resident, please see our CCPA Notice available at <https://www.pae-engineers.com/content/ccpa-notice>.

Colorado, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please email us at privacy@pae-engineers.com.

CHILDREN'S INFORMATION

PAE's Sites are intended to be used by adults and corporate entities interested in PAE. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on the Sites or through any of their features, register on the Sites, make any purchases through the Sites, use any of the interactive or public comment features of this Sites, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a person under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 18, please contact us at privacy@pae-engineers.com.

CHANGES TO THIS PRIVACY POLICY

Due to changes in technology, legal requirements, and our Sites, PAE may revise our Privacy Policy from time to time. We will notify you of changes by posting changes here and updating the policy revised date, or by other appropriate means. If we make material changes to how we treat your personal data, we will notify you through a notice on the Sites' home pages. We suggest that you check this page periodically to see if any changes have been made. Changes to this Privacy Policy are effective when they are posted on this page.

QUESTIONS AND COMPLAINTS

PAE takes all reasonable precautions to protect personal information in its possession from loss, unauthorized use, misuse, disclosure, alteration, or destruction. PAE may conduct compliance audits of its relevant Privacy Practices to verify adherence to this Privacy Policy. PAE will investigate and attempt to resolve any complaints or disputes regarding use and disclosure of personal information in accordance with the principles listed in this policy.

For any questions about our policy, please contact:

Phone: 503-226-2921

Email: privacy@pae-engineers.com

Mail:

PAE Consulting Engineers, Inc
Attn: Data Privacy
151 SW 1st Ave Suite 300
Portland, OR 97204

If you feel that PAE is not complying with its Privacy Policy or with the applicable Data Privacy Laws, you may lodge a complaint with PAE's CFO. If the complaint is not resolved to your satisfaction, you may make a written request to the appropriate national, provincial, state, or federal privacy or data protection officials or regulator asking them to investigate.