

PRIVACY POLICY

Effective Date

This Privacy Policy ("Policy") is effective as of, and was last updated on, 8/27/2026.

Scope

This Privacy Policy describes Innoconn Construction Management, LLC's ("Innoconn," "our," "us," or "we") policies regarding the treatment of Personal Information we collect, receive, process, or store about you when you (1) visit our website at www.innoconn.com (the "Site"), (2) apply for employment with Innoconn (California applicants only), or (3) otherwise engage with us (collectively, the "Services"), including after we no longer provide those Services to you. "Personal Information" is non-public information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to, an individual.

This Privacy Policy does not apply to information we collect from you in connection with your actual or prospective employment with Innoconn, other than as set forth in the "Collection of Applicant Personal Information" and "Disclosure of Applicant Personal Information" sections below.

When you use our Services, you agree to our collection, use, and disclosure of Personal Information about you as described in this Privacy Policy. If you do not provide us with Personal Information we request, we may not be able to provide you with our Services or your experience with those Services may be impaired.

Collection and Disclosure of Personal Information

This section describes the Personal Information we collect and disclose in connection with (1) actual or prospective clients ("Clients"; each a "Client") and (2) employment applications submitted by California residents ("Applicants"; each an "Applicant"). Each is addressed separately below.

Collection of Client Personal Information

The Personal Information we collect from Clients generally includes: (1) Personal Information about you that is needed to provide our Services; and (2) Personal Information that assists us in improving our Services. Below you will find a chart that describes the categories of Personal Information we, or service providers or contractors on our behalf, collect, where that Personal Information comes from, and our purpose for collecting that Personal Information, all within the last 12 months. We did not necessarily collect all of the specific pieces of Personal Information listed for any given individual. For purposes of the below chart, "operational functions" include things like auditing our Services, understanding how our Site is used, improving our Services, security, preventing fraud, and for legal compliance purposes.

Personal Information We May Collect	Where We Get It	Why We Collect It
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Identifiers and contact information, such as name, phone number, postal address, email address, and IP address.	• Directly from you • From your interactions with our Site	• To provide our Services (e.g., to respond to inquiries) • To assist with operational functions
Business and professional information, such as job title, business contact information, industry, and company size.	• Directly from you	• To provide our Services • To assist with operational functions
Any categories of Personal Information described in Cal. Civ. Code § 1798.80(e), such as identifiers, contact information, and signature.	• Directly from you	• To provide our Services • To assist with operational functions
Geolocation data.	• Directly from you • From your device when using our Services	• To assist with operational functions • Data analytics
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet website, application, or advertisement.	• From your interactions with our Site	• To assist with operational functions • Data analytics

For purposes of the above chart, when we collect Personal Information directly from you, this includes, for example, when you input the information into a webform or upload documents containing the information to us or our service providers.

Disclosure of Client Personal Information

Below you will find a chart that generally describes the categories of Personal Information we disclose, to whom we disclose it, and the purpose for the disclosure of that Personal Information, all regarding Personal Information we have collected from Clients within the last 12 months.

Personal Information We Disclose	To Whom We Disclose It	Why We Disclose It
Identifiers and contact information, such as name, phone number, postal address, email address, and IP address.	Service providers (e.g., information technology and website hosting providers)	• To provide our Services • To assist with operational functions

Business and professional information, such as job title, business contact information, industry, and company size.	Service providers (e.g., information technology providers)	• To provide our Services • To assist with operational functions
Any categories of Personal Information described in Cal. Civ. Code § 1798.80(e), such as identifiers, contact information, and signature.	Service providers (e.g., information technology providers)	• To provide our Services - To assist with operational functions
Geolocation data.	Service providers (e.g., data analytics providers)	• To assist with operational functions • Data analytics
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet website, application, or advertisement.	Data analytics providers (e.g., Google Analytics)	• To assist with operational functions • Data analytics

In addition to the above, in certain circumstances, as permitted by law, we might disclose some Personal Information without an explicit authorization from you. For example, we may disclose your Personal Information to law enforcement and similar authorities to comply with applicable law or legal process, protect our interests, or prevent or prosecute fraud. Your Personal Information may also be transferred in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction.

We do not "sell" or "share" your Personal Information, as those terms are defined under applicable state privacy laws, for monetary or other valuable consideration. We also do not collect, use, or sell Personal Information for the purpose of training large language models or other artificial intelligence technologies.

Collection of Applicant Personal Information

This section describes the collection, use, and disclosure of Personal Information of Applicants within the scope of the application relationship. For information regarding our other data practices (e.g., the practices that apply when you visit the Site), see the sections above.

We do not "sell" or "share" Personal Information we obtain from Applicants. We only use sensitive Personal Information as necessary to process an Applicant's application and evaluate their candidacy (e.g., to verify eligibility to work, conduct background checks, and comply with legal requirements), or as otherwise permitted by law. If an Applicant does not provide us with certain Personal Information when requested, we may not be able to perform certain functions, such as considering the Applicant's application for employment.

Below you will find a chart that generally describes the categories of Personal Information we might collect from Applicants, where that Personal Information comes from, the purpose for collecting it, to whom we might disclose it, and the purpose for that disclosure, all within the last 12 months. We did not necessarily collect or disclose all of the specific pieces of Personal Information listed for any given Applicant.

Personal Information We May Collect	Where We Get It	Why We Collect It
Identifiers, such as name, address, email address, phone number, and government-issued identification number.	• The Applicant • Entities and people to whom the Applicant refers us • Background check providers	• To evaluate employment applications (including confirming eligibility and performing background checks) - Communicating with Applicants - Legal compliance
Professional or employment-related information, such as employment history, resumes, cover letters, references, and job title(s) sought.	• The Applicant • Entities and people to whom the Applicant refers us • Background check providers	• To evaluate employment applications
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).	• The Applicant	• To evaluate employment applications
Characteristics of protected classifications under California or federal law (e.g., gender, race, veteran status), where voluntarily provided.	• The Applicant • Background check providers	• To evaluate employment applications
Any categories of Personal Information described in Cal. Civ. Code § 1798.80(e), such as	• The Applicant • Entities and people to whom the Applicant refers us	• To evaluate employment applications

identifiers, contact information, and signature.	• Background check providers	
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For purposes of the above chart, when we collect Personal Information from the Applicant, this includes, for example, when you input the information into an employment application or upload documents containing the information to us or our service providers.

Disclosure of Applicant Personal Information

Below you will find a chart that generally describes the categories of Personal Information we disclose, to whom we disclose it, and the purpose for the disclosure of that Personal Information, all regarding Personal Information we have collected from Applicants within the last 12 months.

Personal Information We Disclose	To Whom We Disclose It	Why We Disclose It
Identifiers and contact information, such as name, phone number, postal address, email address, and IP address.	Service providers (e.g., background check providers)	To evaluate employment applications
Any categories of Personal Information described in Cal. Civ. Code § 1798.80(e), such as identifiers, contact information, and signature.	Service providers (e.g., background check providers)	To evaluate employment applications

We do not "sell" or "share" Applicants' Personal Information, as those terms are defined under California law. California Applicants have the same rights described in the "Your Rights and Abilities" section above, subject to certain exceptions. Applicants may exercise these rights using the contact information in the "How to Exercise Your Rights" section below.

How Long We Retain Your Personal Information

We retain each category of Personal Information for as long as needed to fulfill the purposes for which we collected it. The criteria we use to determine our retention period includes:

- how long the Personal Information is needed to provide our Services to you;
- the type of Personal Information collected;
- how recently you engaged with us and the nature of that engagement;
- whether we are legally or contractually required to maintain your information for a certain period of time;
- the nature of your relationship with us; and
- other legal considerations (e.g., statutes of limitations).

Digital Technologies

We use digital tracking technology to gather information about your interactions with the Site. Certain information about your use of the Site may be collected automatically through the use of digital tracking technology, including, but not limited to:

- details of your visits to and information generated in the course of your use of the Site (including the timing, frequency, and pattern of service use) including, but not limited to, traffic data, location data, weblogs and other communication data, the resources that you access, and how you reached our Site; and
- details regarding the device you use to access our Services, including but not limited to your operating system and browser type.

We do not currently use marketing or advertising technologies on the Site, and we do not sell or share your Personal Information for cross-context behavioral advertising. We use Google Analytics to help us understand how visitors use the Site, such as to analyze traffic and improve the Site's performance. You can learn more about Google Analytics by visiting "How Google uses information from sites or apps that use our services," located at <https://policies.google.com/technologies/partner-sites>. You may install a Google Analytics Opt-out Browser Add-on by visiting <https://tools.google.com/dlpage/gaoptout>.

You can learn more about cookies, see what cookies have been set on your computing device, and learn how to manage and delete them by visiting <http://allaboutcookies.org>.

While we recommend that you leave digital tracking technologies enabled, as they allow you to take advantage of some of the features of the Site, you have the ability to control our cookies. Specifically, you can configure your browser settings to (i) receive notifications when you are receiving new cookies, (ii) disable cookies, or (iii) delete cookies. Please refer to your Web browser's help section for information on how to do this. If you elect not to allow cookies to be placed, you may not be able to use or to enjoy all of the features of the Site. Your browser or device may include "Do Not Track" functionality. At this time, we do not alter our Site's data collection and use practices in response to Do Not Track signals. Because we do not engage in the "selling" or "sharing" of Personal Information or engage in cross-context behavioral advertising, we do not process opt-out preference signals.

Your Rights and Abilities

If you are a resident of California, Connecticut, Louisiana, Texas, or Utah, and subject to certain exceptions, we provide the right to:

- know and access the Personal Information we have collected about you, including obtaining a copy of your Personal Information in a portable, readily usable format;
- correct inaccurate Personal Information that we maintain about you;
- delete your Personal Information, again subject to certain exceptions;
- not receive discriminatory treatment for exercising your privacy rights; and

- opt-out of the sale or sharing of your Personal Information, including for purposes of targeted advertising, if we were selling or sharing your Personal Information.

Additionally, if you are a resident of Connecticut, you have the right to obtain a list of the third parties to which we have sold your Personal Information, if we were to sell Personal Information.

If you are a resident of Connecticut, Louisiana, or Texas and do not agree with our decision regarding your privacy request, you may submit a request to appeal our decision by emailing us at info@innconn.com.

How to Exercise Your Rights

If you are entitled to make a request, or an authorized agent of someone who is (an "Agent"), you can email your request to info@innconn.com, call us at 1-860-519-5804 or complete the webform. If you are an Agent, please indicate that when submitting your request. Agents must generally provide a signed authorization evidencing their authority to act on behalf of another individual.

Following your request, we will take reasonable steps to verify your identity, including asking you to provide us with information to confirm your identity (e.g., your name, email address, or phone number). Once we have verified your request, we will make good faith efforts to evaluate and act on your request, but there may be circumstances in which we might not grant your request. If we deny your request, we will tell you why unless we are prohibited from doing so by law.

Children's Information

Our Site and Services are intended for users age 16 and over. We do not knowingly collect Personal Information from children under 16 and therefore, we do not sell or share such Personal Information. If you are under 16, do not use or provide any Personal Information on the Site. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that Personal Information. If you have reason to believe that your child has provided us with their Personal Information, please email us at info@innconn.com. We do not knowingly solicit or accept Personal Information from individuals under 13 years old.

Safeguarding the Personal Information We Collect

Although no website, app, platform, or business is 100 percent secure, the security and confidentiality of your Personal Information is important to us, so we take administrative, technical, and physical measures to protect the Personal Information you provide to us.

Links to Third-Party Websites

The Site may contain links to other websites not operated or controlled by us (the "Third-Party Sites"). The policies and procedures set forth herein do not apply to any Third-Party Sites. The owners and operators of all Third-Party Sites are responsible for all Personal Information provided, collected, maintained, stored, or otherwise disclosed on those sites, if any. The links on the Site do

not imply that we endorse or have reviewed the Third-Party Sites, including their privacy policies, if any. We strongly encourage contacting those sites directly for information on their privacy policies.

Policy Updates

We may amend this Privacy Policy at any time in our sole discretion. Please re-visit this page periodically to stay aware of any changes. If we modify this Privacy Policy, we will post the updated privacy policy to our Site and update the effective date at the top of this Privacy Policy. Your continued use of our Site after a revised privacy policy becomes effective indicates that you have read, understood, and agreed to the revised privacy policy.

Contact Us

If you have any questions or concerns related to our Privacy Policy and procedures, please contact us by phone at 1-860-519-5804 or by email at info@innconn.com.