

Job Applicant Privacy Policy

Applicability: American Water Works Co Inc., and its controlled subsidiaries (together “American Water” or the “Company”)

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Executive Sponsor: General Counsel

Policy Owner: Chief Compliance Officer

This Job Applicant Privacy Policy (“**Policy**”) describes the personal information American Water Works Company, Inc. and our subsidiaries and affiliates (collectively, “**American Water**,” “**we**” and/or “**our**”) collect, use, disclose, transfer, and store (collectively, “**process**”) in connection with our recruitment activities. While this Policy is intended to describe the broadest range of our processing activities, these activities may be more limited in some jurisdictions based on local laws. For example, the laws of a particular state may limit the types of personal information we can collect or how we use that information. In those instances, we adjust our internal policies and practices to reflect the requirements of local law.

We may change this Policy from time to time. If we make changes to this Policy, we will notify you by revising the date at the top of this Policy. If we make material changes, we will provide you with additional notice, such as by sending you a notification.

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I. APPLICABILITY OF OTHER POLICIES

This Policy does not cover our processing of personal information collected from you as an American Water customer or visitor of our websites. To learn more about American Water’s privacy practices in those cases, please see our American Water [Privacy Policy](#).

In some cases, you may provide personal information to third parties that we work with, such as a careers website operated by a third party. You understand that the information you provide to third parties is not under our control and is not subject to this Policy. Please refer to the privacy policies of such third parties before providing them with your personal information.

II. INFORMATION WE COLLECT

We collect information in connection with your application to work with us. For example, we may collect:

- **Identifiers**, such as name, postal address, email address, and other similar identifiers;
- **Eligibility to work information**, such as whether you are authorized to work in the United States;

- **Characteristics of protected classifications under state or federal law**, such as gender, race, ethnicity, veteran status, and disability status;
- **Professional and employment-related information**, such as your applications, resumes, curriculum vitae, files you choose to share with us, cover letters, information provided to us during an interview, shared with us by references, interview notes, results of any assessments, employment history, salary expectation, and other work-related documentation, including records, forms, logs, and agreements;
- **Education information**, such as names and degree information;
- **Internet or electronic network activity information**, such as information regarding your interactions with our [careers site](#) and other information collected via cookies, web beacons, and similar technologies (e.g., browser information, device information, IP address, the date, time, length of stay, and specific pages accessed during your visits to our careers site);
- **Information from publicly available sources**, such as your LinkedIn profile or personal website.

Your decision to apply for a position and provide your personal information to us is voluntary. We will tell you if additional information is required to move forward with your application. Providing personal information through the submission of an application, resume, or any other materials does not constitute an offer, promise, or guarantee of employment or any implied or express contract of employment or agreement with American Water. The information submitted will be used for the purposes of evaluating your qualifications for employment. Any decision regarding employment is at the sole discretion of American Water and may be influenced by factors including, but not limited to, business needs, candidate qualifications, and internal policies.

Sensitive Personal Information

In some cases, we may collect sensitive personal information about you, which requires a higher level of protection. Please note that, where permitted by law, we may collect, store, and use sensitive personal information about you, including race, ethnicity, gender, veteran, and disability status. We collect this information for specific purposes, such as to accommodate a disability or illness, comply with legal obligations such as anti-discrimination or diversity regulations (where applicable), protect the health and safety of our employees, and facilitate internal programs relating to diversity, equity, inclusion, and anti-discrimination. You are entirely free to decide whether to provide such information and your application will not be affected either way. Please be assured that we will only use such sensitive personal information for the purposes set out in this Policy, or as otherwise described to you at the time such information is collected, and in accordance with applicable law.

Information About Others

If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing such information to us.

III. HOW WE COLLECT YOUR INFORMATION

Most of the personal information we collect is obtained directly from you, such as when you submit a job application or when we conduct a phone or in-person interview. We may also receive information about you from other sources, such as from your named references, persons who referred you for a position, from background checks (where applicable), recruiting agencies, third-party recruitment sources and websites, and publicly available sources such as your LinkedIn profile.

When you visit our [careers site](#), we collect certain information automatically. To collect this information, we may use tracking technologies, such as cookies and web beacons. A “cookie” is a small text file stored on your hard drive or in device memory that help us improve our websites and your experience. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that we use on our websites and in our emails to help deliver cookies, count visits, and understand usage. For more information about how we use cookies, please review the cookies options.

IV. HOW WE USE YOUR INFORMATION

We use your personal information to evaluate a potential employment relationship with you and for other business purposes, including managing our business, keeping our systems secure, and complying with specific legal obligations. Such uses include:

- **To manage our hiring and recruiting activities**, such as to assess your skills, qualifications, and suitability for a particular role or opportunity, communicate with you about the recruitment and hiring process, respond to your requests, inquiries, and comments, verify your information, complete your reference and/or background checks (where applicable) if we offer you a position or other opportunity with us, and improve our recruitment and hiring process more generally;
- **To administer our applications, software, and systems**, including to ensure the security of our workforce, guests, property, and assets, and to monitor and audit network traffic and information in such applications, software, and systems;
- **For legal and compliance purposes**, such as to implement internal policies, detect, investigate, and respond to suspected fraud, security incidents, or other activity that is illegal or violates our policies, exercise a legal claim, cooperate with law enforcement investigations, and comply with applicable laws, regulations, legal processes, or governmental requests;
- **To protect the health, safety, and vital interests** of American Water, applicants, or of another natural person, such as to prevent physical harm or financial loss;
- **To comply with our legal obligations and internal policies** relating to diversity, inclusion, and anti-discrimination;
- **As necessary and appropriate** to provide reasonable accommodations; and
- **To enable solely internal uses in a lawful manner** that are reasonably aligned with your expectations based on our interactions with you and that are compatible with the context in which the information was provided to us.

If we hire you, information we collect in connection with your application will become part of your employment record and be used during the onboarding process and for other employment-related purposes in accordance with our internal personnel privacy policy.

The table describes the categories of personal information we collect and to whom we disclose such information for a business purpose now and over the past 12 months.

<i>Category of Personal Information</i>	<i>Categories of Recipients</i>
Identifiers, such as your name, mailing address, and email address	Hire Right, our third-party vendor.
Characteristics of protected classifications under California or U.S. federal law, such as your gender and race	Third-party vendors who process the Company’s Affirmative Action Plans receive sensitive personal information about applicants.
Internet or electronic network activity information, such as your use of our careers site	Cloud storage service providers; internal review of analytics.

Audio or visual information, such as video recordings from security videos	Fraud detection and security service providers, if necessary to protect the Company or our employees.
Professional and employment-related information, such as your resume and employment application	If you are not hired, your resume and related information is maintained in an internal database. Records are maintained for three years in accordance with our Record Retention Policy.
Sensitive personal information, such as your race and ethnicity	Third-party vendors who process the Company’s Affirmative Action Plans receive sensitive personal information about applicants.

V. HOW WE DISCLOSE YOUR INFORMATION

Within American Water: We may disclose your personal information to American Water personnel and affiliates who need to know the information, including personnel in the recruiting, and human resources in the department responsible for the position for which you are applying.

Service Providers and Contractors: We disclose personal information to service providers and contractors that need access to such information to perform services on our behalf. For example, we disclose certain information to service providers who facilitate our applicant tracking system, travel booking and expenses, relocation support, reporting and analytics, and verification/background checking services. We may also disclose information about you to third-party recruiting agencies.

Professional Advisors: We disclose information about you to our professional advisors, including accountants, auditors, and lawyers. We only permit these advisors to process your personal information for specified purposes and, as appropriate, in accordance with our instructions and the provisions of this Policy and applicable law.

Other Third Parties: In certain limited circumstance, we disclose your personal information to other third parties, including (a) to comply with our obligations, to protect the rights and property of American Water, our customers and the public, to cooperate with law enforcement investigations and to detect and respond to suspected illegal activity and threats to the health or safety of any person or of our systems or services, (b) in connection with, or during negotiations of, any merger, joint venture, sale of company assets, financing, or acquisition of all or a portion of our business, assets or stock by another company (including in connection with any bankruptcy or similar proceedings), and (c) with your consent and at your direction.

We may also disclose aggregated or de-identified information, which cannot reasonably be used to identify you. American Water processes, maintains, and uses this information only in a de-identified fashion and will not attempt to re-identify such information except as permitted by law.

We do not “sell” or “share” your data as defined under California law.

VI. DATA RETENTION

If your application for employment is unsuccessful (or you withdraw from the process or decline our offer), we will retain your information for a reasonable period of time beyond the end of the application process for the purposes described above, including complying with our legal obligations, resolving disputes, and as necessary for our legitimate interests,

such as to consider you for other current and future employment opportunities at American Water. If you do not want us to contact you regarding other roles, please contact us at privacy@amwater.com. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations and our internal data retention policies.

If your application for employment is successful, personal information gathered during the recruitment process will be retained during your employment in accordance with our internal personnel privacy policy and data retention policies.

VII. YOUR PRIVACY RIGHTS

You have the right to (1) request to know more about and access your personal information, including in a portable format, (2) request deletion of your personal information, and (3) request correction of inaccurate personal information. To request access, correction, or deletion of your personal information, please contact us at privacy@amwater.com. We may verify your request by asking you to provide certain information. Any request to exercise one of these rights will be assessed by American Water on a case-by-case basis. There may be circumstances in which we are not legally required to comply with your request, such as a legal exemption under applicable law.

You can designate an authorized agent to submit a privacy rights request on your behalf. We may ask authorized agents to submit proof of their authority to make a request, such as a valid power of attorney or proof that they have signed permission from the consumer who is the subject of the request. In some cases, we may be required to contact the individual who is the subject of the request to verify his or her own identity or confirm the authorized agent has permission to submit the request. If you are an authorized agent seeking to make a request, please contact us at privacy@amwater.com.

We will not discriminate or retaliate against you for exercising your privacy rights.

VIII. APPLICANTS RESIDING OUTSIDE OF THE UNITED STATES

Cross-Border Data Transfers

American Water is based in the U.S., and we process and store personal information on servers located in the U.S. We also use service providers to process personal information, and they may be located in, or have servers in, the U.S. and other countries. Where required by law, we provide adequate protection for the transfer of personal information in accordance with applicable law, such as by obtaining your consent, relying on the European Commission's adequacy decisions, executing Standard Contractual Clauses, or complying with another approved data transfer mechanism.

Additional Disclosures for Canada

If you reside in Canada, this section applies to you. You may exercise your rights to access and correct the personal information we hold about you by emailing us at privacy@amwater.com. By submitting personal information to us or our service providers, you consent to the collection, use, disclosure, and transfer of your personal information in accordance with this Policy and as permitted or required by law. You may withdraw your consent at any time by emailing us at privacy@amwater.com. If you withdraw your consent (or if you decide not to provide certain personal information), you acknowledge that we may not be able to move forward with your application.

Additional Disclosures for Europe

If you are located in the European Economic Area ("EEA"), United Kingdom ("UK"), or Switzerland, this section applies to you.

When we process your personal information, we do so based on the following legal grounds:

- Processing is necessary to take steps at your request (e.g., to process your application for employment).

- We have a legitimate interest in processing your personal information (e.g., our interests in considering candidates for current and future employment opportunities and in managing and improving our recruitment and hiring process).
- Processing is necessary to comply with our legal obligations.
- Processing is necessary to protect your vital interests or those of others.
- We have your consent to process your personal information. When your consent is the legal basis for our processing, you may withdraw such consent at any time by emailing us at privacy@amwater.com.

You have the right to (1) request to know more about and access your personal information, including in a portable format, (2) request deletion of your personal information, (3) request correction of inaccurate personal information, (4) request restriction of processing of your personal information, and (5) object to the processing of your personal information for certain purposes. To exercise any of these rights, please email privacy@amwater.com. Any request to exercise one of these rights will be assessed by American Water on a case-by-case basis. There may be circumstances in which we are not legally required to comply with your request, such as a legal exemption under applicable law.

If you have a concern about our processing of personal information that we are not able to resolve, you have the right to lodge a complaint with the relevant data protection authority by emailing privacy@amwater.com.

IX. CONTACTING US

If you have any questions regarding this Policy, please contact us at privacy@amwater.com.