

Supplemental Notice for the Processing of Personal Data Related to Coronavirus (COVID-19) Pandemic

With respect to Employees of Fluor Corporation and its Subsidiaries, this notice supplements the [“Notice to \(and as applicable, Consent By\) Employees of Fluor Corporation and its Subsidiaries for the Processing of Personal Data”](#) posted internally in OneFluor/Career & Life/HR Toolkit/Practices/Information Privacy & Security.

With respect to contractors and subcontractors, clients, suppliers, business partners and other third parties under contract with Fluor, this notice supplements the “Notice for the Processing of Personal Data to Fluor Corporation Business or Contracting Partners, Suppliers, or Other Third Parties” found at the privacy policy link at the bottom of the home page of Fluor, www.fluor.com.

This notice provides for the additional data processing related to the Coronavirus (COVID-19) pandemic. While Fluor’s original notices may cover these activities, in the interest of greater fairness and transparency, Fluor wishes to supplement those notices to explain in greater detail the applicable legal bases for processing your personal data, what personal data is held, where it is held, to what third parties it is transferred, for what purposes it may be used, to what categories of recipients it is transferred, and for what periods it is held.

Identity of Information Controller and Contact Details

The company that is primarily responsible for the collection and processing of your personal data will be the local company by which you are employed or with whom you directly transact business and may be referred to in data protection law as a 'controller' or legally recognized equivalent. In some cases, if a client or other third party is directly collecting your personal data and/or making decisions relating to the processing of such data, such client or other third party will be the controller or co-controller and will have responsibility to manage and protect your personal data. Fluor will use reasonable efforts to identify, or have identified, the applicable controller at the point such personal data, in this case health information, is collected.

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

Purposes for Which Fluor Uses Your Personal Data and Categories of Data Processed

The coronavirus pandemic requires Fluor to process this personal data, for general purposes of Corporate Security / Health, Safety & Environmental, HR Compliance and Legal and Compliance; secondary purposes Personnel Administration / Master Data, Project Staffing, Mobility, Analytics, Benefits Administration, and Legal and Compliance related to legal contracts.

More specifically, Fluor uses this personal data for the purposes of (1) protection of company employees when on the company's physical property or on a project site, (2) compliance with HR

policies and procedures relating to the health and safety of employees, contractors and other third parties, including any audits or spots checks of such compliance, and (3) complying with legal obligations to cooperate with regulatory bodies to which Fluor is subject; (4) support of the company's administrative and organizational activities, including employee administration relating to terms and conditions of employment, (5) acquiring skilled labor for the staffing of projects, including but not limited to project pursuit, project planning, and project execution, (6) management of employees and contractors on both global and domestic assignments, (7) making decisions, and creating a strategy for improving, company performance and growth, and (8) with respect to employees only, administration of employee health and other benefits.

The personal data collected and maintained may include, but is not limited to: data about specific health conditions, such as COVID-19, vaccination status for COVID-19, test results relating to COVID-19, and related personal data, including screening questions relating to you, your contacts and other members of your household (including travel plans) to support contact tracing for COVID-19, all only as necessary for lawful and legitimate purposes, such as to provide a safe working environment. All efforts will be made to collect the minimal data required to meet the purposes for collection. See below for more information about the legal basis for processing your personal health information.

Legal Bases for Processing of Your Personal Data

In some countries, your consent will be required to process health-related data, and Fluor (or the applicable controller) shall use all reasonable efforts to obtain such consent at the time of the collection of such data, e.g. through a signature at the end of a COVID-19 related survey or input form. Where we do not rely upon your consent to the processing of health-related data and if and to the extent permitted by local law, we will rely on the following legal basis:

- 1) If the processing is necessary for reasons of public interest in the area of public health, such as to protect the health and safety of workers onsite at an office or project location or while traveling.
- 2) If the processing is necessary to protect the vital interest of the data subject or another natural person, such as in the case of a health emergency.
- 3) If the processing is necessary to comply with a statutory obligation or for the establishment, exercise, or defense of a legal claim, such as to confirm whether Fluor undertook steps necessary to provide a safe working environment. If the processing of such health-related data is required by law, Fluor (or the applicable controller) shall use all reasonable efforts to identify such regulation and the impact upon the data subject for non-compliance at the time of collection.

Where Your Personal Data is Held

To the extent possible and practicable during this pandemic, Fluor is centralizing the processing and storage of your personal data on standard tools (including third party hosted tools) that meet applicable requirements for the implementation of technical and organizational controls having regard to the level of sensitivity of the data, pursuant to Fluor standard procedures. In certain cases, clients may require access to personal health data to provide a safe working environment, and in so doing, to the extent such clients collect such data, Fluor will endeavor to obtain reasonable assurances that such data will

be kept secure. In such event and where the client is the data controller, the client may provide its own notice at the time of or prior to collection, which client notice shall apply in lieu of this supplemental notice.

If Fluor transfers your personal information outside of the country where it was collected, we will take steps to ensure your information is adequately protected in accordance with applicable privacy and personal information protection laws. For any questions regarding where your personal data may be held, please contact us as detailed below.

This notice, along with the above referenced prior notices and the security practices and procedures implemented by Fluor to protect your personal data, constitute Reasonable Security Practices and Procedures under Section 43A of India's Information Technology Act, 2000.

Categories of Recipients of Personal Data and Retention Periods

The personal data held by Fluor either in manual form or in the personnel records databases may be disclosed for the purposes listed above, to: authorized personnel within Fluor, including Fluor human resource management and benefits administration staff, business managers, team leaders and other staff in the appropriate Fluor offices; certain other Fluor employees who may, from time to time, incidentally handle your personal data but only for legitimate business purposes and after receiving any appropriate training and certain IT or IT security personnel, but only for purposes of administering the Fluor network or its security and integrity; business partners and clients and their service providers if and to the extent necessary to provide a safe working environment for the applicable project to which you are assigned; third parties such as governmental agencies or where Fluor is under a legal obligation to provide your personal data; and third parties which provide a service to Fluor (e.g. a health or service provider engaged to intake health records or a data hosting provider engaged to maintain health records), where such third parties agree to protect the confidentiality of the personal data and to process it only in accordance with the original purposes for which it was collected.

Your personal data will be held for only so long as it is needed for Fluor's business purposes, and in accordance with applicable corporate document retention schedules and local law or regulation. 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 data, please contact us as detailed below.

Your rights in relation to your personal data

The same rights that you have in relation to the other personal data Fluor processes about you also apply to the personal data covered by this supplemental notice. For more information, please refer to the applicable notice referenced above.

In accordance with local jurisdiction laws regarding applicable data subject rights for the erasure of your personal data that is deemed by the Company to be irrelevant, you can always submit a request to Fluor via the contact information below to remove your personal data retained by Fluor.

Contact Information

You may contact Fluor if you have any questions or concerns regarding any of the matters described in this notice, by contacting your local HR representative. You may in the alternative contact HR Data Privacy, HR.Data.Privacy@fluor.com or the Chief Privacy Officer at chief.privacy.officer@fluor.com, or by telephone at (469) 398-7000.

Chief Privacy Officer: chief.privacy.officer@fluor.com

HR Data Privacy: hr.data.privacy@fluor.com