

CALIFORNIA EMPLOYEE & JOB APPLICANT PRIVACY NOTICE AND NOTICE OF COLLECTION

Effective Date: January 1, 2024

Summary

This California Privacy Notice is provided pursuant to the California Consumer Privacy Act, as amended (the “CCPA”). It applies to California residents who are job applicants, employees, potential contractors, or contractors of AssuranceSD, Inc., its subsidiaries, and its affiliates (collectively, the “Company”). All usages of “you,” “yours,” etc. are references to such California residents.

Notice

Categories of Data Collected, and Associated Purposes

We collect personal information when you provide it directly to the Company through email, telephone calls, text messages, documents and other files, website forms, and other electronic and offline communications methods. We also collect personal information automatically when you access and use the Company websites, devices, systems, and online services. Further, we may collect personal information from third parties, such as background check providers and your current and former employers. We use this information for typical business management, operational and commercial purposes (including to maintain or service accounts, perform employee- and contractor-related activities, process or fulfill requests, verify employee or contractor information, process payments, perform analytics, store data, internal research, to verify and maintain the quality or safety of products and services, audit the use of the Company websites, devices, systems, and online services, defend and protect us and others from harm or legal claims, as required by applicable law, and as further described below. The Company does not “sell” or “share” personal information for third-party targeted advertising as those terms are defined by the CCPA.

- A. **Generally.** The Company collects and uses personal information concerning you in furtherance of your potential or actual employment or engagement for services, our administrative and business operations, and to meet legal requirements. We collect information from and about you as relevant to those purposes. In some cases, we collect personal information about you from third parties, such as background check and driving record information providers, from third parties that you instruct or authorize to send information to us, and from publicly available sources.
- B. **More Specifically.** The categories of personal information we may collect and process (but only to the extent and in a manner that is consistent with applicable law), and associated purposes, are as follows:
 - a. *Personal identifiers and personal details.* The Company collects personal identifiers (such as your contact information, Social Security number, driver’s license number, or passport number) and relevant personal details (such as your date of birth). In some instances, we may also create a personal identifier for you, such as an employee number. We use this information to process payroll, maintain employment or contractor records, report and pay taxes and other withholdings and garnishments for employees, manage benefits for employees, facilitate business travel, contact for emergency or other purposes, administer benefits, interact with unions (if applicable), carry out performance reviews and evaluations, perform risk management activities (including background checks), implement and track safety efforts, maintain security and safety of premises and systems, respond to workers compensation claims, comply with our legal and contractual

obligations, and otherwise as part of typical employment- and contractor-related activities.

- b. *Online identifiers.* The Company may collect your IP address and other online identifiers when you use the Company devices, systems, networks, websites, and other tools and services. This information may be collected using cookies, pixels, and similar technology. We may also collect log-in credentials used to access the Company devices, systems, networks, websites, and other tools and services. We use this information for identity verification and authentication, security, fraud detection and prevention, device and network management, acceptable use of the Company's technology resources, and otherwise as part of typical employment- and contractor-related activities.
- c. *Financial information.* The Company may collect financial information (such as your bank account number or payment card number) to make payroll and other payments to you.
- d. *Compensation, benefits, withholdings, and garnishment information.* With respect to employees, the Company may collect and create information associated with your benefits (including beneficiaries), withholdings, garnishments, legal orders, loan repayments, compensation, pensions and stock option information, vacation and time/off balances, expense reimbursement, employee and dependent benefit plan participation details, and similar information. We use this information to process payroll, report and pay taxes and other withholdings and garnishments, manage benefits, interact with unions (if applicable), and otherwise as part of typical employment-related activities.
- e. *Work performance information.* The Company may collect and create information associated with your work performance (such as your timecards, performance appraisals, feedback, safety records, drug and alcohol test records, and disciplinary and grievance actions, letters of appreciation and commendation, and date of and reason for resignation or termination) to carry out performance reviews and evaluations, develop and monitor training, perform risk management activities, administer employee recognition programs, implement and track safety efforts, comply with our legal and contractual obligations, and otherwise as part of typical employment- and contractor-related activities.
- f. *Protected class information.* The Company may collect protected class information as defined by applicable law (such as race, gender, copies of citizenship and right to work information, and military veteran status) as required by law, to report to regulators and to measure the Company's performance against diversity goals.
- g. *Physical characteristics.* The Company may collect information about your characteristics (e.g., height, weight, and physical limitations) for safety-related purposes, as part of the interactive or accommodation process, or otherwise as part of typical employment- and contractor-related activities.
- h. *Biometric information.* The Company may collect and use your biometric information (such as your fingerprints) for the purpose of controlling access to the Company computer systems, computing devices, and Company or other job-site locations. Biometric information may be used for identity verification and authentication, security, and fraud detection and prevention.
- i. *Geo-location information, including precise geo-location.* The Company may automatically monitor your location information electronically when you are working on-site or are in a vehicle owned or leased by the Company. For example, the Company may

track badge access to its facilities and worker locations or electronic visit verification (EVV) when they are on duty. We collect this information for safety and security purposes, and otherwise for typical workplace and facilities monitoring.

- j. *Claims and medical reports information.* The Company may collect and create information associated with claims (such as, with respect to employees, workers compensation claims and unemployment claims), including related medical reports. We collect this information to process and respond to such claims, administer the workers compensation program, perform risk management activities, implement and track safety efforts, develop training, provide required information to unions (if applicable), and comply with our legal and contractual obligations.
- k. *Health information.* The Company may receive health-related information when you are involved in an accident or when you provide it to us (such as, with respect to employees, in connection with a request for sick leave, provide us with information about restrictions or accommodations, or through health screening or certifications). The Company uses health-related information to implement and track safety efforts, maintain sickness records, maintain occupational health programs, assign staffing, assess restriction or accommodation requests, and otherwise as part of typical employment- and contractor-related activities. Note that any health information generated in connection with our employee health benefit plan is maintained separately and is subject to policies and procedures designed to comply with the federal Health Insurance Portability and Accountability Act.
- l. *Professional, employment, and education information.* The Company may maintain personal information that you submitted in connection with a job application or otherwise provided by you to the Company. Such information includes professional and employment-related information (such as title, resume/CV, compensation information, skills, and background check results) and education information (such as academic transcripts, professional certifications, language capabilities, and confirmations of attendance at an educational institution). We may use this information to assess your qualifications for certain jobs and positions, develop or recommend training programs, provide required information to unions (if applicable), comply with legal and contractual obligations, and otherwise as part of typical employment-related activities.
- m. *Audio and visual information.* The Company may monitor and collect activity and communications made through the Company devices and communications systems (such as our telephone and email systems) and monitor and record video taken by security cameras. The Company may also monitor and record video of online meetings and presentations. We use such information for training, quality assurance, information and system security, fraud and other potential criminal activity detection and prevention, and for protecting the safety and rights of the Company, you, and others. Audio and video recordings of trainer and participant involvement in online training may be recorded and used for subsequent training sessions.
- n. *Survey responses.* We may send surveys and otherwise solicit information from you and other employees to help us improve our business, including our processes, culture, and operations.
- o. *Content of Communications.* The Company may monitor and retain the content of emails, text messages, and other messages that you send using a Company computer system. We

collect this information for ordinary business purposes, as well as for identity verification and authentication, information and system security, fraud and other potential criminal activity detection and prevention, performance monitoring, and as part of typical employment- and contractor-related activities.

- p. *Internet or other electronic network activity information.* The Company may monitor and collect Internet and other network activity information (such as Internet, application, and file use) of the Company computer systems and computing devices, and the online communications and online cloud services that are used to conduct the Company business. This information may be collected using cookies, pixels, and similar technology. We collect this information for identity verification and authentication, information and system security, fraud and other potential criminal activity detection and prevention, performance monitoring, and as part of typical employment- and contractor-related activities.
 - q. *Agreement Records.* We may collect records associated with your acknowledgment and agreement to our policies and procedures, contracts, and other employment and legal documents.
 - r. *Signature Data.* The Company collects your signature and related authentication details in connection with any documents you electronically or physically sign and provide to the Company. This information may be used to maintain the integrity of our processes, enforce rights, prevent fraud, and validate your identity.
 - s. *Sensitive Personal Information.* The Company collects information that may constitute “sensitive personal information” under the CCPA. As described above, the Company may collect social security, driver’s license, state identification card, and passport numbers, account log-in credentials, financial account information, precise geolocation information, health information, racial or ethnic origin, union membership (if applicable), and the contents of email and text messages sent using the Company devices, systems, and accounts. The purposes for collecting this information are described more specifically above, and we do not use or disclose sensitive personal information for purposes other than those specified in CCPA Regulations, §7027(m). We do not “sell” or “share” sensitive personal information for third-party targeted advertising (as those terms may be defined by the CCPA). We do not draw inferences from sensitive personal information we receive, as defined by the CCPA.
- C. **De-identified and Aggregated Data.** We de-identify and/or aggregate data we receive and may use and disclose it for any business, operational, or commercial purpose. Once de-identified, we will maintain the data in de-identified form and not attempt to re-identify it.

Retention

We use the following criteria to determine the length of time for which we retain personal information, including sensitive personal information, subject to this Notice:

- A. the business purposes for which the personal information is used, and the length of time for which such information is required to achieve those purposes, including for system of record and litigation hold purposes;
- B. whether we are required to retain the category of personal information in order to: (a) comply with legal or contractual obligations; (b) assert or defend against potential legal claims or as necessary

to investigate theft, fraud, or other activities that are potentially (i) in violation of our policies and procedures applicable to you or (ii) a violation of the law; (c) ensure a secure online and/or working environment; and/or (d) protect health and safety;

- C. the privacy impact on the individual of ongoing retention; and
- D. the manner in which the personal information is maintained and flows through our systems and how best to manage the lifecycle of such information in light of the volume and complexity of the systems in our infrastructure and the need to maintain high integrity and availability within our systems.

In addition, we delete personal information if you appropriately invoke the right to delete as to such personal information and California law requires its deletion when requested.

Information Sharing

We may share and have shared in the last 12 months the categories of personal information listed above for our typical business management, operational and commercial purposes (including to maintain or service accounts, perform employee- and contractor-related activities, process or fulfill requests, verify employee or contractor information, process payments, perform analytics, store data, internal research, to verify and maintain the quality or safety of products and services, audit the use of the Company websites, devices, systems, and online services, defend and protect us and others from harm or legal claims, as required by applicable law, and as further described below.

- A. **Affiliates.** We share information, including personal information, with our affiliates in the Company family of companies, and any successors thereto in the normal course of our business operations, for business purposes such as to communicate with you, to maintain employment or contractor records, report and pay taxes, and otherwise as part of typical employment- and contractor-related activities. In this regard, personal information may be shared with one of our affiliates for use in providing a service to us.
- B. **Vendors and service providers.** We share information, including personal information, with vendors and service providers that process such information to perform services for us in connection with our business operations.
- C. **Government, legal, and similar disclosures.** We may share personal information with law enforcement, the courts, our advisors, attorneys, and others who participate in the legal process, if we believe doing so is required or appropriate to: comply with legal requirements and law enforcement requests (such as a court order or subpoena); comply with legal process (such as discovery); or protect your, our, or others' rights, property, or safety.
- D. **Merger, sale, or other asset transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your personal information may be shared with the other parties and advisors involved under an obligation of confidentiality in connection with the negotiation of such transaction, and your personal information may be transferred as part of such a transaction.

Privacy Rights Requests

- A. **You may have other rights.** The CCPA includes specific rights to make privacy-related requests described in this Notice below. You may have other rights under California or other applicable law,

and the information provided below is not intended to suggest that these are the only rights you may have.

- B. **List of CCPA Rights.** You have the following rights under the CCPA with respect to personal information, to request: additional information about our data collection, use, disclosure, and sales practices in connection with your personal information; the specific personal information collected about you during the previous 12 months; the correction or deletion of the personal information we have about you; and the restriction of certain processing of personal information. You also have a right to know the categories of personal information collected, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about you. You have the right to not be discriminated against for exercising your privacy rights.
- C. **Authorized Agent.** Under the CCPA, you may use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of your written permission (for example, a power of attorney) that demonstrates authorization to submit a request for you. An authorized agent must follow the process described below to make a request, and we will also (a) require the authorized agent to verify the agent's own identity and (b) confirm the agent's authority with you.
- D. **Request Process.** To make a request, you may email us at privacy@assurancesd.com or call us at 949.301.9950 Ext. 1401. In most cases, you will be required to provide your name, employee or contractor identifiers, and other contact information so that we can verify your request, and in some cases additional information may be required. Where possible, we will attempt to match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it. If we cannot verify your request, we may ask you for additional information to help us do so.
- E. **Response.** We will respond to your request within 45 days of your request, unless we notify you that we need to extend our response time for an additional 45 days. We may not always be able or required to comply with your request, in whole or in part, and we will notify you in that event.

Changes to this Notice

We reserve the right to revise this Notice at any time. When we do, we will give you notice of the revised Policy by posting it with an updated "Effective Date" at the top of the Notice. If we make any material changes, we will let you know by email or other communication. You are responsible for regularly reviewing the current Notice.

Contact Information

AssuranceSD, Inc.
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