

## **Notice of Data Privacy for Employees and Applicants**

### **Introduction**

We respect your right to privacy and are committed to handling your personal information responsibly and to maintaining the confidentiality and security of your personal information. This privacy notice outlines the categories of personal information that we may collect from or about you for employment-related reasons. This notice also explains our purposes for using that information and describes with whom we may share it. In this notice, “we” or “us” means Kidder Mathews, its predecessors, successors, assigns, divisions, affiliates, parents, and related entities.

### **To Whom This Notice Applies**

This notice applies to anyone residing in the State of California who applies for employment with us or who is currently or formerly employed by us. This notice is required by the limited portions of the California Consumer Privacy Act (CCPA) that apply to covered employers.

### **Categories of Personal Information and Purposes for Which They are Used**

We collect and maintain the categories of personal information outlined below. For each category, we provide some examples as well as an explanation of our employment-related purposes for using the information. In addition to the reasons explained below, we may also use any of the categories of information listed below to comply with our legal obligations; to exercise our legal rights, such as responding to a complaint, governmental audit, or lawsuit; to seek professional advice; to engage in transactions requiring review of employment records, such as evaluating potential mergers and acquisitions or obtaining quotes for insurance; and to take measures and gather information to ensure the safety of our employees, clients, contractors, volunteers, and interns. Additionally, we use many of the categories of information listed below, where permitted by law, to make employment decisions concerning recruitment, pay, discipline, promotions, demotions, or separations from employment.

### **Personal identifiers**

These include items such as your current or former name, legal name, nickname, aliases (if any), postal address, contact information (mailing address, residential address, phone numbers, email addresses, etc.), Social Security number, driver’s license number, signature, photo, documentation of identity and employment authorization, or other similar personal identifiers. We collect this information for employment-related purposes such as to communicate with you as an applicant or employee, to establish your identity and your authorization to work in the U.S., to process payroll and tax forms, to enroll you and your dependents in employee benefit plans, and to contact you in case of emergencies or scheduling changes.

### **Protected classification characteristics under California or federal law**

These include characteristics such as your age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, sex (including gender, gender identity, and gender expression), military service, protected veteran status, disability status, and other protected statuses. If we collect this information, it is for employment-related purposes such as to verify that you meet any minimum age requirements for a position; to comply with governmental

tracking and reporting requirements such as filing an annual EEO-1 Report or complying with affirmative action program requirements for federal contractors; to comply with federal government restrictions on the release of sensitive defense technology to certain foreign nationals; to conduct pay equity or equal pay analyses; to administer leaves of absence due to military service; to comply with our obligations to reasonably accommodate individuals with disabilities; to comply with our obligations to reasonably accommodate sincerely held religious beliefs; and to take any other actions necessary to comply with the company's equal employment opportunity policies and legal obligations.

### **Benefit plans information**

Our employees may be eligible to participate in employee benefit plans (such as health insurance, 401(k) retirement plans, short-term or long-term disability insurance, etc.) sponsored by us. Information related to these employee benefit plans may include items such as your marital status; the names, ages, and addresses of your dependents or beneficiaries; the amount of money a plan paid on behalf of you or your dependents or beneficiaries; insurance policy number and details; your selections of available benefit plans; payroll deductions to pay insurance premiums; contributions from you or us to your 401(k) account; the investment funds and balances in your 401(k) account; applications for benefit plan enrollment; claim forms and evidence of eligibility; and health or exercise data. We collect this information in order to obtain insurance and ensure the proper functioning of the benefit plans, which may include the need to determine eligibility for benefits, enroll you and your dependents or beneficiaries in the plans; administer claims under the plans; evaluate plan design options; participate in wage and benefits surveys; and administer wellness plans.

### **Professional information**

This includes information such as your resume and cover letter, employment application, employment history, dates of employment, promotions and demotions, wages and other compensation, employment contracts and agreements, offer letter, performance history and disciplinary records, workplace complaints and investigations, leaves of absence, sick time, vacation/holiday records, attendance, hours worked, letters of recommendation, and similar information. We use this information to make employment decisions such as hiring, promoting, demoting, transferring, training, disciplining, terminating employment, setting pay, and paying wages (to the extent allowed by law). We also use this information to evaluate compliance with company policies and to comply with our legal obligations. We may also use this information to respond to inquiries from prospective employers about former employees, to the extent permitted by law.

### **Financial information**

This includes information such as bank account details, pay card details, tax information, payroll deductions, wages, retirement account information, corporate credit card number and usage activity, company allowances, and similar information. We use this information to administer payroll, comply with wage withholding orders, manage our business expenses, administer benefit plans in which you are enrolled, participate in wage and benefits surveys, and comply with tax and benefit obligations.

### **Internet, intranet, and other electronic network activity information**

This includes electronic communications sent, received, stored, or accessed on our network, company-supplied devices, company-supplied systems, company databases, or company accounts. We may review your activities or history on any of these platforms. Examples include

login information (such as user ID, password, and Internet Protocol address) for work-related online accounts, building and information system access, unique personal identifiers, online identifiers, sites visited, duration of visits, internet or intranet searches, and similar information. We use this information to ensure compliance with applicable laws and with the company's internal policies as well as to monitor the quality of all communications conducted on our time or while using our property, equipment, or accounts.

### **Educational information**

This includes courses, trainings, and seminars you attended; transcript information; educational degrees; grade point average (GPA); professional licenses and certifications; membership in professional organizations; test scores and other test results; and similar information. We use this information to determine whether you meet relevant educational criteria for a position with us; whether you are meeting continuing education requirements (if applicable); whether your test scores or other test results relevant to a skill or position were satisfactory; whether to retain your position in the event of a downsizing; whether you are eligible for promotions or transfers; and whether you are qualified to operate certain machinery or to perform certain work-related tasks.

### **Biometric information**

This includes fingerprint images collected (with consent); data collected by biometric time clocks or other workplace access devices; faceprints; voiceprints, iris or retina scans; or other physical patterns. We use this information to verify your identity so you may obtain a position with us, access secure areas of our facilities, or access secure electronic databases or other electronic systems. We may also use this information to verify the times and locations at which you enter our facilities or access our systems, for purposes of administering payroll, verifying compliance with security protocols, and monitoring compliance with our attendance policies.

### **Medical information**

This includes medical exams, injury reports, medical certifications, applications for disability benefits, requests for accommodation of a disability, doctors' notes, leave of absence requests, medical and exposure records, health insurance information, reasonable suspicion observations and documentation for purposes of drug and alcohol testing, drug and alcohol test results, and similar information. This information is collected for employment-related purposes such as to administer the following: workers' compensation claims; leave required under federal, state, or local law for your own medical condition or that of a covered family member; reasonable accommodation requests under the Americans with Disabilities Act (ADA) or the California Fair Employment and Housing Act (FEHA); fitness-for-duty exams; post-offer medical exams of applicants; employee benefit plans; drug and alcohol testing policies; and short-term and long-term disability plans. We may also use the information to obtain commercial insurance, such as general liability insurance, workers' compensation insurance, or disability insurance.

### **Geolocation data**

This includes information collected by any tracking apps or devices to track your location or movement. We may use this information to verify that you are following prescribed travel routes; that you are complying with speed limits; that you are driving safely and operating your vehicle properly; that you are complying with legal requirements concerning meal and rest periods and payments for hours worked; and that you are working in areas where your presence is authorized.

### **Audio, electronic, visual, thermal, or similar information**

This includes audio recordings, video recordings, thermal images, and photographs of you. We use this information to conduct job interviews and allow others who were not present to review the interviews; for customer service quality control; for internal and external training; for security badges; to verify your location at work; for professional bios of our employees which are shared with the public; and for marketing purposes.

### **With Whom We May Share Your Personal Information**

We will only share your personal data with those who have a legitimate need for it. This includes our employees, contractors, consultants, and other parties who have a business need for this information in order to help us establish, manage, or terminate our employment relationship with you; to comply with our legal obligations under local, state, and federal law; or to provide you with various benefits. Those parties include:

- Insurance companies that offer employee benefit plans for which our employees are or may be eligible. They may use the information collected to establish coverage, enroll participants, administer claims, and provide quotes for benefit plans.
- Third-party administrators of our employee benefit plans. They may use the information collected to establish coverage, enroll participants, and administer claims.
- Associations, consultants, academic institutions, or government agencies that request data on employee wages or benefits in order to compile or report data for surveys. The data in any such survey results is sufficiently aggregated that there is no way to identify any particular individual's data.
- Federal, state, and local government agencies. We provide information to them to comply with legal requirements and to exercise our rights as an employer. These government agencies use the information we provide them to enforce the laws of their respective jurisdictions, assess taxes, allocate mandatory tax payments, collect Census data, investigate workplace complaints, verify equal employment opportunity compliance, administer benefit payments, establish and enforce wage withholding orders for child support, and take similar actions.
- Third-party payroll providers. They use the information we provide to administer our payroll, including activities such as paying wages, adjusting paid leave banks as you use paid leave, reimbursing you for business expenses, reimbursing you from benefit plans, complying with your directions for payment of your wages, issuing pay stubs, and maintaining payroll records and reports in accordance with legal requirements.
- Financial institutions. They use the information we provide to receive direct deposits of payments from us to you, based on your payment directions. They may also use the information we provide to set up an employee or corporate account, or to give you access to certain corporate accounts or assets.
- Co-employers (other companies who have a shared employment responsibility), such as a temporary employment agency. Their reasons for using the information we provide are the same as those described above for our own uses.

- Successors (companies that may take over our place in the employment relationship), such as a company that purchases us. Their reasons for using the information we provide are the same as those described above for our own uses.
- Parties who have or who acquire the right to such information (such as parties who subpoena the information or are otherwise legally entitled to receive it, or parties with whom you request us to share the information).

#### **Personal Information Does Not Include:**

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the scope of the CCPA, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; or personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

#### **Disability Accommodation**

If you are an individual with a disability who needs to access this notice in an alternative format, please contact Human Resources at 206-248-732 or [jen.schomer@kidder.com](mailto:jen.schomer@kidder.com).

#### **Questions and Comments**

If you have any other questions or comments about this notice and how it applies to your personal information, please contact Human Resources at 206-248-732 or [jen.schomer@kidder.com](mailto:jen.schomer@kidder.com).