

CALIFORNIA EMPLOYEE PRIVACY POLICY

FLAD & ASSOCIATES, INC.

Please take notice that Flad collects certain information about you. For more information on Flad's policies for employees, please refer to Flad's Employee Record Protection section in the Flad Employee Handbook.

California's California Consumer Privacy Act ("CCPA") provides California residents (including job applicants, employees, owners, directors, officers, and contractors of Flad who are acting in such a capacity ("employment position") and emergency contacts and beneficiaries) with certain rights. This policy describes the personal information we collect, use, and disclose outside of Flad. It also describes your rights under the CCPA and how to exercise those rights.

1. HOW WE OBTAIN YOUR PERSONAL INFORMATION

Flad collects information about you from the following sources: 1) you; 2) references, prior employers, recruiters, job-related social media platforms; 3) third-party sources of demographic information; 4) third-party companies, such as background check companies, drug testing facilities, and 5) claim administrators and investigators. Depending on your interactions with Flad, we may or may not collect all of the information identified about you.

2. PERSONAL INFORMATION WE COLLECT

Flad collects the following categories of personal information:

- "Sensitive Personal Information" such as Social Security Numbers (SSN), Driver's license, financial account or card numbers, precise geolocation, racial and ethnic characteristics, contents of mail, email and text messages, biometric data.
- "Identifiers" such as name, government-issued identifier (e.g., SSN), and unique identifiers (e.g., employee ID).
- "Other Personal Information" such as real name, signature, SSN, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, passport number, federal identification authorizing work in the United States, access and/or passcodes, insurance policy number, education, employment, employment history, bank account number, other financial information, medical information, or health insurance information. (Some personal information included in this category may overlap with other categories).
- "Protected Characteristics" such as age, marital status, gender, sex, race, color, disability, citizenship, primary language, immigration status, military/veteran status, request for leave, and medical conditions.
- "Commercial Information" such as transaction information and purchase history (e.g., in connection with travel or other reimbursements).
- "Internet or Network Activity" such as browsing history and interactions with our online systems and websites and any personal information that you provide while accessing Flad's computer systems, such as personal credit card information and passwords.
- "Geolocation Data" such as device location from usage of Flad's devices.
- "Biometric Information" related to access to Flad's or its clients' secured access points.
- "Sensory Data" such as audio, electronic, visual, and similar information.

- “Professional or Employment-Related Information” such as work history and prior employer.
- “Non-Public Education Information” such as transcripts.
- “Inferences” drawn from any of the Personal and Sensitive Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.

3. HOW WE USE YOUR PERSONAL INFORMATION

We may use or disclose your personal information for one or more of the following purposes:

- To operate, manage, and maintain our business.
- For hiring, retention, and employment purposes.
- To otherwise accomplish our business purposes and objectives, including, for example:
 - Emergency services.
 - Conducting research, analytics, and data analysis.
 - Maintaining our facilities and infrastructure.
 - Quality and safety assurance measures.
 - Conducting risk and security controls and monitoring.
 - Protecting confidential and trade secret information.
 - Detecting and preventing fraud.
 - Performing identity verification.
 - Performing accounting, audit, and other internal functions, such as internal investigations.
 - Complying with the law, legal process, and internal policies.
 - Maintaining records.
 - Claims processing.
 - Responding to legal requests for information and subpoenas; and
 - Exercising and defending legal claims.
- Any other purposes authorized by the California Privacy Protection Agency, California or Federal law.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information to a service provider, contractor, or third party.

When we disclose personal information to a service provider or contractor, we enter into a contract that describes the purpose and requires the receiving entity to keep personal information confidential and not use it for any purpose except performing the services described in the contract or as allowed under the CCPA. Examples of third parties we disclose information to:

- Affiliates
- Background search and employment eligibility companies
- Word processing applications, signing vendors, and communication platforms
- Advisors such as attorneys, banks, credit card companies, accountants, financial advisors, consultants, and insurance providers
- Insurance and benefits providers
- Education providers
- Building access and security services
- Job posting platforms and employment recruiters
- Network monitoring, analytics, and incident response vendors

- Regulatory and governmental agencies

5. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

Flad retains the information it receives about you only for as long as necessary for purposes set out in this Privacy Policy and to the extent necessary to comply with applicable laws and legal obligations. The retention clock generally starts when our relationship ends.

6. YOUR RIGHTS UNDER THE CCPA

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights, if applicable:

6.1. Right to Know

You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your personal information (“Right to Know”).

6.2. Right to Delete

You have the right to request that we delete any of your personal information that we collected and retained (“Right to Delete”). Once we receive and verify your request, we will delete, de-identify, or aggregate your personal information, unless an exemption or exception applies.

6.3. Right to Correct

You have the right to request that we correct your personal information if it is inaccurate (“Right to Correct”). Once we verify your identity and confirm that your personal information is inaccurate, we will correct your personal information.

6.4. Right to Limit the Use of Sensitive Personal Information

You have the right to direct us to limit the use of your sensitive personal information to uses which are necessary to perform the services or provide the goods reasonably expected. However, we only use Sensitive Personal Information in an employment context and as reasonably expected by a consumer.

6.5. Right to Opt Out

If applicable, you have the right to opt out of the 1) sale of personal information, 2) sharing of your personal information, and 3) use of personal information in automated decision-making technology in connection with decisions about the consumer’s work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

We do not sell your personal information. Further, we do not sell the personal information of minors under 16 years of age.

We do not share your personal information. Further, we do not share the personal information of minors under 16 years of age. (“Sharing” means the disclosure of personal information for cross-contextual behavioral advertising.)

We do not process your personal information with automated decision-making.

6.6. Right to Non-Discrimination

You have the right to not be discriminated against for exercising your rights under the CCPA.

7. SUBMITTING A REQUEST

7.1. How to Submit a Request Yourself

To make a Request to Know, Request to Delete, or Request to Correct, please contact us by either method below:

- Call us at (877) 709-1092, ask to be transferred to human resources
- Email us at HumanResources@flad.com

A Request to Know, Request to Delete, or Request to Correct must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. The employer will match identifying information you provide with the information already maintained by Flad.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Only (1) you or (2) a person authorized by you to act on your behalf, may make a Request related to your personal information.

7.2. Authorized Agents

Before we can respond to a Request to Know, Request to Delete, or Request to Correct submitted by an authorized agent, we need to verify not only that person or entity's authority to act on your behalf but also verify the identity of the authorized agent.

If you are authorized to submit a request on behalf of a California resident, please email us at HumanResources@flad.com or call (877) 709-1092 (ask to be transferred to human resources).

7.3. Response Timing and Delivery Method

We will acknowledge receipt of a Request to Know, Request to Delete, or Request to Correct within 10 business days of its receipt. We will respond to a request within 45 days of its receipt. If we require more time (up to 45 additional days for a total of 90 days from receipt of the request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

8. CHANGES TO THIS CALIFORNIA EMPLOYEE PRIVACY POLICY

We reserve the right to amend this California Employee Privacy Policy at our discretion and at any time. If we make changes to this California Employee Privacy Policy, we will notify you by email or post an updated version on our intranet and on www.flad.com.

9. HOW TO CONTACT US

If you have any questions or comments about this California Employee Privacy Policy, please do not hesitate to contact us at:

Privacy Support E-Mail:	HumanResources@flad.com
Postal Address:	Flad & Associates, Inc. Attn: HR Privacy 644 Science Drive Madison, WI 53711

Effective Date 12/01/2023