

## California Employee Privacy Notice for California Employees

**Effective Date:** July 2024

Arctic Glacier U.S.A., Inc. (“Arctic Glacier”, “we”, “us”, or “our”) provides this California Employee Privacy Notice (“Notice”) to notify you of our privacy practices as required by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (“CPRA”).

Arctic Glacier collects and processes your personal information, including sensitive personal information, for human resources, employment, benefits administration, health and safety, and business-related purposes. We are committed to properly handling the personal information collected or processed in connection with your employment relationship with us.

We may collect personal information, including sensitive personal information, from you in a variety of different situations, including, but not limited to directly from you (e.g., from forms you complete when you apply for employment and during your employment), indirectly from you (e.g., your use of our website, email, and/or over the telephone), and from third parties (e.g., background checks, consumer reporting agencies, references, timekeeping software, internal or third-party tracking of usage of Arctic Glacier’s email and telephone systems and computer networks, public agencies). Arctic Glacier may collect the following categories of personal information:

Personal Information Category	Examples	Disclosed for a Business Purpose?	Categories of Third Parties to Whom the Personal Information is Disclosed
Identifiers	Your name, contact information, gender, date of birth, signature, Social Security number, driver’s license or state identification numbers, and similar information for your dependents and beneficiaries.	Yes	To the extent permitted by applicable law, your personal information may be disclosed to the following categories of third parties: <ul style="list-style-type: none"> <li>• to our affiliates for the purposes described in this Notice</li> <li>• to our third-party service providers who provide services such as payroll and benefits providers</li> <li>• to a third party in the event of any direct or indirect reorganization, including merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in</li> </ul>
California Customer Records employment and personal information	Your name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, current employment, employment history,	Yes	

Personal Information Category	Examples	Disclosed for a Business Purpose?	Categories of Third Parties to Whom the Personal Information is Disclosed
	bank account number, or any other financial, medical or health insurance information.		connection with any bankruptcy or similar proceedings)
Protected classification characteristics under California or federal law	Age (40 years or older), race, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), or military and veteran status.	Yes	<ul style="list-style-type: none"> <li>• to a third party where we either aggregate, anonymize, de-identify or otherwise strip data of all personally identifiable characteristics</li> <li>• to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others</li> </ul>
Internet or other similar network activity information	Activity on the information systems (such as internet browsing history, search history, intranet activity, email communications, stored documents and emails, usernames, and passwords) and all activity on communications systems (such as phone calls, call logs, voicemails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of company-issued devices).	Yes	
Geolocation data	Time and physical location related to use of	Yes	

Personal Information Category	Examples	Disclosed for a Business Purpose?	Categories of Third Parties to Whom the Personal Information is Disclosed
	an internet website, application, or device.		
Professional or employment-related information	Employment application information (work history, academic and professional qualifications, educational records, references, and interview notes, background check, drug testing results, work authorization, performance and disciplinary records, salary, bonus, commission, and other similar compensation data, benefit plan enrollment, participation, and claims information, leave of absence information including religious, military and family obligations, health data concerning employee and their family members.	Yes	
Non-public education information	Education records, degrees and vocational certifications obtained.	Yes	

Sensitive personal information is a subtype of personal information consisting of specific information categories. We may collect or process information that falls with the sensitive personal information categories listed in the table below.

Sensitive Personal Information Category	Examples	Disclosed for a Business Purpose	Categories of Third Parties to Whom the Personal Information is Disclosed
<b>Identifiers</b>	Social security number, driver's license, state identification card, passport and visa information, and immigration status and documentation.	Yes	<p>To the extent permitted by applicable law, your sensitive personal information may be disclosed to the following categories of third parties:</p> <ul style="list-style-type: none"> <li>• to our affiliates for the purposes described in this Notice</li> <li>• to our third-party service providers who provide services such as payroll and benefits providers</li> <li>• to a third party in the event of any direct or indirect reorganization, including merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)</li> <li>• to a third party where we either aggregate, anonymize, de-identify or otherwise strip data of all personally identifiable characteristics</li> <li>• to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and</li> </ul>
Complete account access credentials	Usernames, account numbers, or card numbers combined with required access/security code or password.	Yes	
Precise geolocation	Physical access to an office location, or the location of a delivery, sales, or other employee in the field.	Yes	
Racial or ethnic origin or union membership		Yes	
Citizenship or immigration information		Yes	
Mail, email, or text message contents not directed to Arctic Glacier	Contents of any message that is not sent to Arctic Glacier.	Yes	
Health information	Job restrictions and workplace illness and injury information.	Yes	

Sensitive Personal Information Category	Examples	Disclosed for a Business Purpose	Categories of Third Parties to Whom the Personal Information is Disclosed
			property or protect the rights, property or safety of others

Arctic Glacier does not use or disclose the above sensitive personal information for any purpose other than those permitted under the CPRA.

Arctic Glacier retains each category of personal information, including sensitive personal information, listed above only for as long as necessary to fulfill the business purpose for which it was collected or as required by law. Once it is no longer useful for the business purpose or applicable law, it is either anonymized or deleted. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, and whether we can achieve those purposes through other means, and the applicable legal requirements.

Arctic Glacier may use the personal information, including the sensitive personal information, listed above for business purposes related to your employment or application for employment. Those purposes may include:

- to meet the purpose for which you provided the information
- to contact you
- to evaluate your qualifications and suitability for employment
- to administer pre-employment and post-employment tests and training activity
- to complete the onboarding process
- to conduct criminal and other background checks on applicants and employees
- to manage the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence and maintenance of emergency contact information
- to process work related claims (e.g., insurance claims)
- to prepare and maintain legally required records, such as I-9 forms, EEO-1 forms and affirmative action plans
- to manage employee timekeeping
- to monitor employees use of Arctic Glacier’s information and communication systems, including to help ensure compliance with our IT policies
- to maintain information regarding training, disciplinary action, injuries and other employment history
- to administer benefits
- to process requests
- to provide support
- to ensure a safe working environment

- to meet tax obligations
- to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity
- to comply with company policies and applicable law or regulations.

## **CPRA Rights**

As a California resident, you have the following rights under the CPRA:

*Right to Know:* You have the right to request that we disclose certain information to you about our collection and use of certain personal information, including sensitive personal information, about you as described below:

- The specific pieces of personal information collected;
- The categories of personal information collected;
- The categories of sources from whom the personal information is collected;
- The purpose for collecting, selling or sharing the personal information;
- The categories of third parties with whom we have disclosed the personal information;
- The categories of personal information that we have sold or shared, and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each third party to whom the personal information was sold or shared;
- The categories of personal information that we disclosed for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

*Right to Delete:* You have the right to request that we delete your personal information, subject to certain exceptions.

*Right to Correct Inaccurate Personal Information:* You have the right to request that we correct inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

*Right to Opt-Out of Sale or Sharing:* We do not sell or share (as such terms are defined under the CPRA) your personal information. Arctic Glacier does not have actual knowledge that it sells or shares such information of children under the age of sixteen.

*Right to Limit the Use and Disclosure of Sensitive Personal Information for Certain Purposes:* As stated above, we do not use or disclose your sensitive personal information for any purpose other than those permitted under the CPRA.

*Freedom from Discrimination:* You have the right not to receive discriminatory treatment for exercising your rights above, including not to be retaliated against for exercising such rights. To exercise the rights above, you must submit a verifiable request to us by calling us at 1-800-580-8480 or submitting a request online at <https://arcticglacier.com/arctic-glacier-employee-privacy-policy/>

We may need you to provide additional information to verify your request, such as providing certain data elements so that we can confirm they match the personal information already maintained by us. We will not use this additional information for anything other than handling your request. You may designate an authorized agent to make a request in certain circumstances on your behalf by providing the agent with signed permission to do so. We endeavor to respond to all such requests within forty-five (45) days, although there may be a brief delay in processing a request while we verify that the request is valid and originates from you as opposed to an unauthorized third party. If we require more time, we will inform you of the reason and extension period in writing.

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact [HRAdmin@arcticglacier.com](mailto:HRAdmin@arcticglacier.com).

The Effective Date of this Notice is set forth at the top of this page. We may change this Notice from time to time in our discretion. Changes will be posted to this page. We encourage you to return to this page frequently so that you are aware of our current Notice.