

# CALIFORNIA EMPLOYEE PRIVACY NOTICE

**Effective date: Jan 1, 2023**

This California Employee Privacy Notice (the “**CA Employee Notice**”) explains how the Transform Holdco LLC family of companies (“**Transformco**,” “**our**,” “**we**,” or “**us**”) Collects, uses, and discloses the Personal Information of California employees and others who work for us (collectively, “**Associates**”).<sup>1</sup> In this CA Employee Notice, we use the word “**you**” or “**your**” to refer to anyone within the scope of this CA Employee Notice.

As used in this CA Employee Notice, the term “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual or household. Personal Information does not include information that is publicly available, deidentified, or aggregated.

Unless otherwise noted, the disclosures contained within this CA Employee Notice cover our activities in the prior 12 months from the effective date, as well as our current practices.

## **1. How and Why We Collect Your Personal Information**

### **General Personal Information**

We Collect, use and disclose Personal Information about our Associates as follows (whether we Collected a specific category of Personal Information depends on the nature of your interaction with us):

<b>Category of Personal Information</b>	<b>Purposes for Collection, Use, and Disclosure</b>
<b>Identifiers</b> including real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers	<ul style="list-style-type: none"><li>• To communicate with you</li><li>• To open and maintain employee records</li><li>• To assess your eligibility for employment</li><li>• To onboard and enroll you as an employee</li><li>• To provide compensation and benefits</li><li>• To comply with applicable laws and regulations</li><li>• To manage the security of our premises and systems</li></ul>
<b>Personal Information described in Cal. Civ. Code § 1798.80(e)</b> , including your Identifiers listed above, signature, social security number, passport number, driver’s	<ul style="list-style-type: none"><li>• To communicate with you</li><li>• To assess your eligibility for employment</li><li>• To open and maintain employee records</li></ul>

<sup>1</sup> Capitalized terms defined in the CCPA that are used in this California Notice shall have the same meaning as in the CCPA.

<p>license or state identification card number, and financial information</p>	<ul style="list-style-type: none"> <li>• To onboard and enroll you as an employee</li> <li>• To provide compensation and benefits</li> <li>• To comply with applicable laws and regulations</li> <li>• To manage the security of our premises and systems</li> </ul>
<p><b>Characteristics of protected classifications</b> under California or federal law, including age and date of birth, marital status, race, ethnic origin, sex, gender, sexual orientation, gender identity, military or veteran status, and disability</p>	<ul style="list-style-type: none"> <li>• To comply with applicable laws and regulations</li> <li>• To comply with U.S. Equal Employment Opportunity Commission (“EEOC”) and California Civil Rights Agency (“CCRA”) requirements, and other equal opportunity initiatives</li> </ul>
<p><b>Commercial information</b>, including products or services purchased</p>	<ul style="list-style-type: none"> <li>• To reimburse you if you have job-related expenses and seek reimbursement</li> </ul>
<p><b>Internet or other electronic network activity information</b>, including browsing history, search history, and information regarding your interactions with our websites, systems, and applications</p>	<ul style="list-style-type: none"> <li>• To manage corporate information technology</li> <li>• To monitor your compliance with our internal policies and procedures</li> <li>• For business improvement, management, and planning</li> <li>• To investigate security breaches and misuse of computer equipment and systems</li> <li>• To manage the security of our premises and systems</li> <li>• To detect and prevent fraud against you and/or us</li> </ul>
<p><b>Geolocation data</b>, including access-control data based on employee badge swipes and location data inferred from your device IP address</p>	<ul style="list-style-type: none"> <li>• To manage corporate information technology</li> <li>• To manage the security of our premises and systems</li> </ul>
<p><b>Audio, electronic, visual, or similar sensory information</b>, including closed-circuit images, photographs and video or audio recordings of you (for example if you answer phone calls on a recorded line)</p>	<ul style="list-style-type: none"> <li>• To manage job duties, evaluate performance, and operate our business</li> <li>• To authenticate your identity</li> <li>• To manage the security of our premises and systems</li> </ul>

<p><b>Professional or employment-related information</b>, including:</p> <p>Recruitment information (such as skills, qualifications, references, recommendations, languages spoken, and other information included in a resume, application form, or cover letter)</p> <p>Background information commonly used for onboarding and security screenings, including citizenship, immigration, visa status, and work authorization information; and criminal records information</p> <p>Motor vehicle checks and drug screening</p>	<ul style="list-style-type: none"> <li>• To manage job duties, evaluate performance, and operate our business</li> <li>• To provide compensation and benefits</li> <li>• To comply with applicable laws and regulations</li> <li>• To assess your eligibility for employment</li> </ul>
<p><b>Non-Public education information</b>, including grades, transcripts, records of attendance, disciplinary records, and other information relating to your secondary and post-secondary education</p>	<ul style="list-style-type: none"> <li>• To review your qualifications and credentials</li> </ul>

**Sensitive Personal Information**

Sensitive Personal Information is a type of Personal Information. We Collect the following categories of Sensitive Personal Information about our Associates (whether we Collected a specific category of information depends on the nature of your interaction with us):

- Precise geolocation to determine your location and movements while you are in a service vehicle in order to ensure the safety and security of our services.

We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

**2. Sources of Personal Information**

We Collected the Personal Information identified above from the following sources (whether we Collected information from a specific source depends on the nature of your interaction with us):

- **Directly from you.** We Collected information from you during the onboarding process and throughout your interactions with us as Associates, including through our information technology systems, company forms and processes where Associates submit information to us (e.g., expense reports, pre-employment forms, and surveys.)
- **Automatically when using our systems.** We Collected information about you when you used our information technology services and when you accessed our facilities (e.g., video surveillance information).

- **Created by us.** We Collected information about you that we created, such as credentials for access to our information technology systems.
- **Service Providers.** We Collected information about you from certain Service Providers that provide information to help us run our business.
- **Affiliates.** We disclose Personal Information among the companies within the Transformco family of companies and affiliates. We receive information to enable us to manage our business and workforce.
- **Other parties.** We may have received information about you from other parties when necessary to manage or operate our business or to offer benefits to you.
- **Parties to corporate transactions.** As permitted by law, we may receive Personal Information as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of a business or assets.

### **3. Disclosures of California Employee Personal Information**

We have not Sold or Shared for cross-context behavioral advertising the Personal Information of California Associates that we Collect in the context of your work with us. If you also interact with us as a Consumer, please review our California Consumer Privacy Notice ([https://transformco.com/privacy#California\\_Residents](https://transformco.com/privacy#California_Residents)) for more information about our practices in that context.

We disclosed the Personal Information described in this CA Employee Notice to Service Providers that help us run our business, manage and administer benefits, and manage our human resources activities.

We have also disclosed, or may disclose in the future, the Personal Information described in this CA Employee Notice in other circumstances when required to or permitted by law. These circumstances include:

- disclosures among the companies within the Transformco family of companies and affiliates, when permitted by law, to manage employee relationships, benefits, pay and compensation, and other human resources services across the Transformco family of companies and affiliates;
- disclosures to provide products or services requested by Associates;
- disclosures required or permitted by law to defend against legal claims;
- to law enforcement agencies, courts, regulatory agencies and others when the disclosure is required or permitted by law, including to comply with valid legal process; and
- as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of our business or assets.

#### **4. How Long We Keep Your Personal Information**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information (which includes the categories of Personal Information set forth in the charts and sections above) for as long as necessary to fulfill the purposes we Collected it for, as required to satisfy any legal, obligations, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Information, we consider applicable legal requirements, 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 we process your Personal Information for, and whether we can achieve those purposes through other means. For certain types of Personal Information we will only maintain it for a limited duration. Where Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

#### **5. Submitting Requests Relating to Your Personal Information**

If you are a current employee you may access or correct certain Personal Information by logging into MPI and accessing your profile or account settings. You may also contact your HR representative to request access to your Associates file.

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request by calling us at 1 888-527-6415 or by email at HRCMPY@tranformco.com. Please note that, if you submit a request to know, request to delete or request to correct, you will be asked to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you may still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the toll-free number or email listed above.

**Right to Know.** You have the right to know what Personal Information we have Collected about you, which includes:

- (1) The categories of Personal Information we have Collected about you, including
  - a. The categories of sources from which the Personal Information was Collected
  - b. Our Business Purposes for Collecting Personal Information
  - c. The categories of Personal Information that we disclosed for a Business Purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information
- (2) The specific pieces of Personal Information we have Collected about you

**Right to Delete Your Personal Information.** You have the right to request that we delete certain Personal Information we Collected from you, subject to certain exceptions.

**Right to Correct Inaccurate Information.** If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

**Right to Opt Out of Sales and Sharing of Personal Information.** We do not Sell or Share Associates Personal Information and, therefore, we do not offer a way for you to submit such a request.

**Right to Limit Use and Disclosure of Sensitive Personal Information.** We do not use Sensitive Personal Information for the purpose of inferring characteristics about you, or for any other reasons besides the permitted Business Purposes. For this reason, we do not treat the Sensitive Personal Information we Collect as subject to a limit use of Sensitive Personal Information request and, therefore, we do not offer a way for you to submit such a request.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** We will not discriminate against you if you choose to exercise any of the privacy rights described above.

#### **6. How to Contact Us**

If you have any questions about how we handle your Personal Information or if you need to access this CA Employee Notice in an alternative format, please contact: HR Policy & Compliance, [hrcp@transformco.com](mailto:hrcp@transformco.com)

This CA Employee Notice is not a contract of employment and does not provide contractual rights or obligations.