

California Consumer Privacy Act Employee and Applicant Disclosure

Respecting the privacy of our employees is an essential part of our privacy program. We are committed to the proper handling of the Personal Information collected or processed in connection with your employment relationship with us. This disclosure describes categories of Personal Information we collect, the purposes for which we process that information, and our retention and disclosure of that information, in accordance with section 1798.100 (b) of the California Consumer Privacy Act. The CCPA defines Personal Information as categories of information that identify, relate to, describe or are reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household.

For additional information about our data privacy practices, please review our privacy policy at <https://www.axinn.com/privacy.html>.

Categories of Personal Information Collected	
Category A	Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers
Category B	Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history financial information, medical information and health information ¹
Category C	Characteristics of protected classifications under California or federal law, ² such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and marital status
Category E. ³	Biometric information, such as facial recognition and fingerprints
Category F. ^{3,4}	Internet or network activity information, such as browsing history and interactions with our website, applications or systems
Category G. ^{3,4}	Geolocation data, such as device location

¹ This includes name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

² This include sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), age (40 and over), race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave.

³ Only applicable where employer has selected to receive time keeping services from ADP.

⁴ Only applicable where employer has selected to receive screening and selection services from ADP.

Category H. ⁴	Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities;
Category I.	Professional or employment-related information, such as work history and prior employer, human resources data and data necessary for benefits and related administrative services
Category J. ⁴	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records
Category K.	Inferences drawn from any of the Personal Information listed above to create a profile or summary above, for example, an individual's preferences, abilities, aptitudes and characteristics
Category L	Sensitive Personal Information, including: <ul style="list-style-type: none"> • social security, driver's license, state identification card, and/or passport number • financial account information that allows access to an account, including log-in credentials, financial account numbers, passwords, etc. • precise geolocation • racial or ethnic origin • content of mail, email, and text messages (unless the Firm is the intended recipient of the communication) • health information • information concerning sexual orientation

Personal Information is collected for the following purposes:

1. To comply with state and federal law and regulations;
2. To process payroll;
3. To track time and attendance;
4. To manage workers' compensation claims;
5. To administer and maintain benefits, including group health insurance;
6. To administer and maintain retirement service;
7. To manage employee performance of their job duties, including promotions, discipline, and/or termination;
8. To conduct workplace investigations;
9. To evaluate job applicants and candidates for employment;
10. To obtain and verify background checks;
11. To grant and monitor employees' access to secure company facilities;
12. To implement, monitor, and manage electronic security measures on devices that are used to access networks and systems (e.g., incident management);
13. To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company;
14. To maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance;
15. To perform workforce analytics, data analytics, and benchmarking;
16. To perform call monitoring and surveillance (e.g., CCTV); and
17. To provide, validate, or communicate services offered by ADP directly to individuals.

Retention. We retain your personal information for as long as is necessary to process your application for employment, process your payroll, administer your benefits, etc. and in accordance with our data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal information does *not* include certain categories of information, such as publicly available information from government records, personal information you make available to the public, and deidentified or aggregated information.

Disclosure. To carry out the purposes outlined above, we may disclose personal information to service providers or other third parties, such as background check vendors, third-party staffing vendors, information technology vendors, outside legal counsel, and state or federal governmental agencies. We do not not sell or share, as those terms are defined under applicable law, the above categories of personal information. We may add to the categories of personal information we collect and the purposes for which we use that information. We will inform you in the event we do so.

If you have any questions about the collection and processing of your Personal Information or about the security of your Personal Information, please visit our [website](#) or contact Human Resources.