



## CCPA Notice for Employees, Prospective Employees and Contractors

The California Consumer Privacy Act (“CCPA”) gives job applicants, employees and contractors that reside in California the right to know the categories of personal information that Holland Partner Group, and its affiliated entities, successors or assigns (collectively known as “Holland”), may collect from them and the purposes for which such information may be used. This notice supplements our Employee Handbook (which has or will be provided to you if you commence employment with us) and notifies you of our information-gathering and disseminating practices during your potential or actual employment or engagement with Holland (“Services”). References in this notice to “we,” “us,” or “our” mean Holland and references to “you” and “your” mean you, the actual or prospective employee or contractor. Nothing in this notice will create a contract for guaranteed or continued employment or term of engagement.

For additional information about Holland’s data privacy practices, please review our [Privacy Policy](#).

**Information We Collect and Use.** We may collect or have collected in the preceding 12 months the following categories of personal information from you over the course of your Services:

- Identifiers. This includes without limitation your real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, telephone number, birthdate, account name, social security number, driver’s license number, passport number or other similar identifiers.
- Categories of personal information described in Section 1798.80(e) of the California Customer Records Act. This includes without limitation copies of your signature, physical characteristics or description, state identification card number, insurance policy number, education, employment, employment history, bank account number or any other financial information, medical information, health insurance information, and other information that identifies, relates to, describes, or is capable of being associated with you. You may need to provide us with information regarding your height, weight and clothing or shoe size to receive the proper uniform (if applicable) to be worn during your Services. We may keep a photo of you for our records and to provide you with a company ID badge.
- Characteristics of protected classifications under California or federal law. This includes without limitation information will be used for our record keeping purposes and reporting requirements and to access and improve our employee policies, operations and outreach.
- Biometric information.
- Internet or other electronic network activity information. This includes without limitation your browsing history, search history and information regarding your interaction with an internet website, application, advertisement or our Wi-fi, and all electronic files, messages, and other digital archives and electronic communications stored on our computers, laptops, tablets, phones, desktops, websites, emails and other equipment and software (collectively, “Technology Resources”).
- Geolocation data. This includes without limitation, information that can be used to identify your location or the physical location or use of our Technology Resources.
- Audio, electronic, visual, thermal, olfactory or similar information. This includes without limitation security video surveillance technology at our properties or workplaces, video recordings and photos of you at Holland



sponsored events or promotional affairs, voice messages left on our voice mailbox(es), phone conversations recorded for quality control, training or customer service purposes, photo of you for Holland records and files, and your body temperature or other similar information in connection with the Holland's illness prevention protocols.

- *Professional or employment-related information.* This category includes, without limitation, information regarding job applications (e.g., application form, interview notes, references, resume), information related to onboarding for payroll and benefits, information needed for evaluating performance, benefits and entitlements data, bonus payments, business unit / division, company / entity, compensation data, contract type - fixed term / temporary / permanent etc., corporate credit or debit card numbers, hours of work, job title / role, line / reporting manager, office location, personnel number, previous work history, qualifications / certifications, reference or background checks, or salary / wage, salary / wage expectation, clients you have worked or currently work with, work schedule, job assignments, portfolio, hours worked, training and development information, disciplinary and counseling information and termination information.
- *Educational information.* This includes without limitation your education level, degrees, honors, GPA, schools attended, indirect maiden name, and other information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act.
- *Inferences drawn from your personal information.* This includes without limitation, information about an individual such as abilities, aptitudes, suitability for position, etc. or information that helps us engage in human capital analytics to help with (e.g. performance management, talent acquisition, employee retention, other).
- *COVID-19 Screening Information* – This includes without limitation, whether you have experienced any symptoms associated with Covid-19, whether you have tested positive for Covid-19, whether you have been in contact with someone who has been recently showing symptoms of Covid-19 or tested positive for Covid-19, your body temperature, your recent travel information, or whether you have received or plan to receive the COVID-19 vaccination.
- *Sensitive Personal Information.* This category includes:
  - Social Security, driver's license, state identification card, or passport number
  - account log-in, financial account, required security or access code and other information that would permit access to an account
  - precise geolocation
  - racial or ethnic origin
  - religious or philosophical beliefs
  - union membership
  - content of mail, email, and text messages (unless Holland is the intended recipient of the communication)
  - biometric information for the purpose of uniquely identifying a consumer for time keeping
  - genetic information
  - health information
  - information regarding sex life or sexual orientation
  - citizenship or immigration status



- Other categories of personal data that relate to or are reasonably capable of being associated with you. This includes without limitation personal information contained in the messages and other content you send us or our agents, staff, third party service providers, websites, social media networks or other interactive pages. We may also collect personal information about members of your household and emergency contact information, vehicle information (e.g., license plate number), and other information that may be reasonably linked, directly or indirectly, with you.

Holland may add to the categories of personal information it collects and the purposes for which it uses personal information. In that case, Holland will inform you.

**Purposes For Which We Use Your Information.** We may use all or some of the above categories of personal information in:

- Collecting and processing employment applications, including confirming eligibility for employment or work, background and related checks, drug tests, references, employment verification, onboarding, and related recruiting efforts.
- Communicating with applicants about a current application, future job opportunities or current and past employment.
- Maintaining physician records and occupational health programs.
- Maintaining records and satisfying record retention requirements.
- Submitting relevant information to prospective employers.
- Submitting relevant information for payment of wages and bonuses.
- Complying with applicable state and federal health, labor, employment, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations.
- Assessing whether to promote you or expand your responsibilities as an employee or independent contractor of Holland, or in connection to performance reviews.
- Assessing and improving our policies, operations and outreach, and ensuring our policies are not violated.
- Preventing unauthorized access to, use, or disclosure/removal of Holland's property, including Holland's facilities, information systems, electronic devices, network, and data.
- Processing payroll, other forms of compensation, and employee benefit plan and program design and administration including enrollment and claims handling and leave of absence administration.
- Communicating with employees and/or employees' emergency contacts and plan beneficiaries.
- Ensuring and enhancing employee productivity and adherence to Holland's policies.
- Improving accuracy of time management systems, attendance, including vacations, sick leave and other absence monitoring.
- Providing training and development opportunities.
- Investigating complaints, grievances, and suspected violations of Company policy.
- Designing, implementing, and promoting Holland's diversity and inclusion and ESG programs.
- Facilitating the efficient and secure use of Holland's information systems.
- Ensuring compliance with Holland information systems policies and procedures.
- Ensuring the safety of our properties, residents, applicants, employees, contractors, clients and the public with regard to use of Company property and equipment.
- Protecting the legal rights, privacy, safety or property of Company or its employees, agents, contractors, customers or the public including conducting investigations.
- Protecting against fraud or other illegal activity or for risk management purposes.
- Responding to and managing legal claims against Holland and/or its personnel, including civil discovery in litigation.



- Responding to a court, state or federal order, when we believe we must do so by law and/or whenever we deem it appropriate or necessary to inform law enforcement authorities and exercise our rights under applicable law.
- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, merger, acquisition or financing activities, and maintenance of licenses, permits and authorization applicable to Company operations.
- Providing you with uniforms, ID badges,
- Contacting you when necessary regarding the Services, your obligations, work assignments, work schedules, office hours, Holland-sponsored events, information about Holland, its products or services, and other work-related notices.
- Sharing your information, as necessary, with our human resources service providers, payroll processors, benefits vendors, insurance providers, accountants, legal counsel and other third parties in connection to the general operations of Holland and our contractual and statutory obligations as your potential or actual employer.
- Incorporating in our promotional, marketing and outreach material.
- Implementing measures to reduce the spread of Covid-19 or other infectious diseases.
- Screening for Covid-19 and other highly infectious diseases to reduce the risk of spreading the disease in and through our properties or events, to protect our employees, contractors, residents and visitors from exposure to Covid-19, to permit contact tracing related to any potential exposure, and to communicate with employees, residents and visitors regarding potential exposure to Covid-19 so others may take precautionary measures and help prevent further spread of the virus, and obtain treatment, if necessary.

### **Sources of Personal Information**

We may collect your personal information from the following sources:

*You.* We may collect personal information directly from you or your device, such as through your use of our website, facilities or electronic systems, when you send us an email, contact us by phone, or otherwise communicate or interact with us. We collect information when you are an applicant for employment with us or employed by us.

*Related Entities and Affiliates.* We may collect information about you from related parties and affiliates.

*Social media and related services.* We may collect information about you through your social media services consistent with your settings on such services.

*Third parties.* We may collect information about you from third parties such through references, referrals, background check vendors, staffing agencies, clients, or other third-party sources that are lawfully entitled to share your data with us. This may include service providers or contractors who collect or process your personal information on our behalf.

**Retention.** Holland will retain your information for as long as is necessary for the purposes set out in this notice, or to operate its business and comply with our legal obligations, resolve disputes, enforce our agreements and our written policies, including without limitation our Employee Handbook.

In general, 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.



### **Update to this Notice.**

Holland may update this notice from time to time, and at Holland’s sole discretion. When we make changes, we will revise the “Effective Date” of this notice and will post a link to the updated policy on our careers page. Employees will also be able to access the most current policy on our intranet.

### **Disclosing your Personal Information.**

To carry out the purposes outlined above, we may disclose your personal information to our affiliates, service providers and contractors (e.g., background check vendors, benefit vendors, third-party staffing vendors, payroll processors, and information technology vendors), outside legal counsel and government entities.

We may also disclose your personal information to third parties, if necessary, to: (1) comply with federal, state, or local laws; (2) comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; (3) cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local laws; or (4) exercise or defend legal claims.

We may collect and share personal information about you from and with our third-party service providers. We use UKG to process paychecks and job applications. You acknowledge that your use of our third-party service provider’s software and websites are not governed by this notice. If you are asked to provide information on our third-party service provider’s websites, we encourage you to carefully review their privacy policy before sharing your information. For your convenience, below are links to some of the main websites that Holland uses for the data referenced in this notice:

- [Privacy and Data Protection; Security; Compliance | UKG](#)

Lastly, we may transfer personal information to a third party as part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control or acquires all or part of the assets of our business.

We may disclose or have disclosed in the preceding 12 months the following personal information:

<b>Categories of Personal Information</b>	<b>Categories of Third Parties to Whom Information May Be Disclosed</b>
<b>Identifiers and categories of personal information described in Section 1798.80(e) of the California Customer Records Act. – such as name, postal address, email address, phone number, account name, date of birth, Social Security number, driver’s license number, photograph, passport number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers</b>  <i>NOTE: The information in this category may include the following elements of Sensitive Personal Information: Social Security number, driver’s license number, state identification card number, and/or passport number.</i>	Third parties as directed by you.  Affiliates.  Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of business continuity during a business transaction.  Our clients or customers.  Third parties that perform services or collect information on our behalf. For example, to process job applications, to process paychecks, provide information technology support, benefits administration, and data storage.
<b>Characteristics of protected classifications under California or federal law such as citizenship, ethnic background, gender, or other similar identifiers</b>  <i>NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial, ethnic, or national origin.</i>	Successors to all or portions of our business. If all or part of our business is merged or sold, we may disclose personal information in preparation for or as part of that transaction.
<b>Biometric information</b>	

*NOTE: Biometric information is considered an element of Sensitive Personal Information.*

**Internet or other electronic network activity information**

*NOTE: The information in this category may include the following elements of Sensitive Personal Information: the contents of mail, email, or text messages, to which the business was not the intended recipient.*

**Internet or other electronic network activity information**

*NOTE: The information in this category may include the following elements of Sensitive Personal Information: the contents of mail, email, or text messages, to which the business was not the intended recipient.*

**Geolocation data**

*NOTE: The information in this category may include the following elements of Sensitive Personal Information: precise geolocation.*

**Audio, electronic, visual or similar information.**

**Professional or employment-related information, including veteran status or other similar identifiers.**

*NOTE: The information in this category may include the following elements of Sensitive Personal Information: union membership.*

**Educational information**

**Inferences drawn from personal information – such as individual profiles, preferences, characteristics, behaviors or other similar identifiers.**

*NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial or ethnic origin, religious or philosophical beliefs, union membership, health information.*

**COVID-19 Screening Information**

*NOTE: The information in this category may include the following elements of Sensitive Personal Information: health data*

**Sensitive Information**

**Other categories of personal data that relates to or is reasonably capable of being associated with you.**

Governmental entities.

Professional service providers. (e.g. legal counsel, auditors, consultants, etc)

We do not sell or share, as those terms are defined by the CCPA, the categories of personal information listed above.

We do not use or disclose your sensitive personal information for purposes that, with limited exceptions, are not necessary for the application or employment related purpose for which we collect it or as reasonably expected by an average individual in this context or for other permitted purposes under the CCPA or as authorized by regulation.





## **Your Rights.**

As a resident of the State of California, you have certain rights under the CCPA which are outlined below.

*Right To Know About Personal Information Collected or Disclosed.* You have the right to request additional information, beyond that disclosed above, regarding the following, to the extent applicable:

- the categories of personal information Holland collected about you
- the categories of sources from which that personal information was collected
- the business or commercial purposes for which that information was collected, sold, or shared
- the categories of third parties to whom the information was disclosed
- the specific pieces of personal information collected

Upon receipt of a verifiable request to know (see below), and as required by applicable law, we will provide a response to such request.

*Right To Request Deletion of Your Personal Information.* You have the right to request that we delete the personal information we collect or maintain about you. Once we receive your request, we will let you know what, if any, personal information we can delete from our records, and will direct any service providers, contractors and third parties to whom we disclosed your personal information to also delete your personal information from their records.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, without limitation, when the information at issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with Holland and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

Upon receipt of a verifiable request to delete (see below), and as required by applicable law, we will provide a response to such requests.

*Right to Request Correction.* You have the right to request that Holland correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it. Upon receipt of a verifiable request to correct (see below), and as required by the CCPA, we will provide a response to such requests.

*Right to Non-Discrimination for the Exercise of Your Privacy Rights.* We will not discriminate or retaliate against you for exercising any of the rights described above.

## **Submitting Rights Requests.**

To submit a CCPA rights request as outlined above, please contact us at 1-888-663-1069 or emailing us at [dataprivacy@hollandpartnergroup.com](mailto:dataprivacy@hollandpartnergroup.com). We reserve the right to only respond to verifiable consumer requests to know, delete, or correct that are submitted as instructed.

A verifiable consumer request is one made by any individual who is:

- the individual who is the subject of the request,
- an individual on behalf of the individual's minor child, or
- the authorized agent of the individual.

*What to submit.* If we request, you must provide us with sufficient information to verify your identity and/or authority to act on behalf of the individual. In general, we may ask you to provide identifying information that we



already maintain about you or we may use a third-party verification service. In either event, we will try to avoid asking you for sensitive personal information to verify your identity. We may not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. However, making a verifiable request does not require you to create an account with us.

Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. We will not use the personal information we collect from an individual to determine a verifiable request for any other purpose, except as required or permitted by law.

*Our response.* We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request.

We will endeavor to respond to a verifiable request within forty-five (45) calendar days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension.

*Authorized Agent.* You may authorize a natural person or a business (the Agent) to act on your behalf. When you submit a Request to Know, Correct, or Delete, the Agent must provide proof that you gave the Agent signed permission to submit the request, and you either must (i) verify you own identity with the business or (ii) directly confirm with us that you provide permission to the Agent. However, these steps are not required when you have provided the authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

### **Spouses, Dependents, and Associates.**

If you have knowledge that the Company collected personal information related to your spouse, dependent, or partner, please share a copy of this notice with all such individuals.

### **Updates.**

We reserve the right to amend this notice at any time without advance notice.

### **For More Information.**

If you have questions or concerns regarding this notice or use of your information, please contact us by email at [dataprivacy@hollandpartnergroup.com](mailto:dataprivacy@hollandpartnergroup.com) or by calling our toll-free number 1-888-663-1069.

Version	Changes	Date
1.0	First Published Version	1/1/2020
2.0	Updated for CCPA amendments	1/25/2021
3.0	Updated for CPRA amendments	12/18/2023
4.0	Update reference to specific third-party service providers and entities	01/01/2025