



# California Consumer Privacy Act Policy and Notice

## Purpose

Under the California Consumer Privacy Act ("CCPA") and California Privacy Rights Act ("CPRA"), Royal Electric Co. (the "Company") is required to notify you of the personal and sensitive personal information we collect about you. We value your privacy and collect limited personal and sensitive personal information about our applicants, employees, contractors, and covered individuals on an as-needed basis for employment and other work-related purposes.

This notice lists the categories of non-public personal and sensitive personal information we may collect from you in the course of your employment or work-related activities, the intended purpose for seeking this information, who we share your information with, and the length of time the Company intends to retain the information. The exact type of information we collect depends on the nature of your work and the benefits to which you may be entitled to, among other factors. If we change our purposes for collecting certain categories of information, or we request a new category of information not included in this list, we will let you know in writing. If you have any questions now or when we request information, please reach out to your manager or Human Resources.

## California Residents' Privacy Rights and CPRA Requests

The rights in this section apply solely to California residents, and do not apply to individuals living outside of the state.

### Understanding Your Rights

The Company wants to ensure employees, job applicants, contractors, and covered individuals understand their privacy rights under CCPA and CPRA.

- **Right to Access.** You have the right to access Personal Information which we may collect or retain about you. If requested, the Company shall provide you with a copy of your Personal Information which we collect as permitted by the CCPA. You also have the right to receive your Personal Information in a structured and commonly used format so that it can be transferred to another entity ("data portability").
- **Right to Know.** You have the right to request that we disclose the following about your Personal Information, as defined by the CCPA:
  - The specific Personal Information we may collect.
  - The categories of Personal Information we may collect;
  - The categories of sources from which we may collect your Personal Information;
  - The business purpose(s) for collecting or sharing your Personal Information;
  - The categories of Personal Information we may disclose for business purposes; and
  - The categories of third parties to whom we may share your Personal Information.

### CPRA Inquiries and Requests

Employees, job applicants, contractors, and covered individuals can submit CPRA inquiries and requests to [hr@royalelect.com](mailto:hr@royalelect.com) for the following reasons:

- Access personal information
- Delete personal information
- Correct personal information
- Opt out of sale or sharing of personal information
- Limit use and disclosure of sensitive personal information



Royal Electric Co. utilizes Google Analytics for aggregated, anonymized website traffic analysis. To access what browsing information we have or to request to opt out, please send a request to [hr@royalelect.com](mailto:hr@royalelect.com) or complete the opt out request form on our website.

Requests made will be responded to in a timely manner based on CPRA timelines. The Company will not retaliate against individuals submitting CPRA requests or inquiries. The Company may be entitled to refuse requests, in whole or in part, where exceptions under applicable law apply.

**Where We Get Your Information From**

The Company collects information about you from the following sources:

- 1. You
- 2. Prior employers, schools, union halls, apprenticeship programs, references, recruiters, job-related social media platforms
- 3. Third Party Company, Service Providers or Contractor (i.e., background and credit check companies, drug testing facilities)
- 4. Claim administrators and investigators
- 5. Google analytics from Royal Electric Co. website

**Collection of Personal and Sensitive Personal Information**

The table below lists the categories of personal and sensitive personal information we collected in the last twelve (12) months and the Company’s intended use. The Company may or may not collect all the personal and sensitive personal information for you outlined in the categories below.

Category of Personal and Sensitive Personal Information	Intended Use
Contact information (e.g., address, telephone numbers, email addresses, IP address); family and marital status including names, addresses, and ages of dependents; insurance coverage and benefits elections; payroll files	Administer employee benefits; emergency contact information; payroll taxes; general communication purposes
Social security number	Determine eligibility to work in the U.S.; administer employee benefits; payroll taxes
Driver’s license number and personal car insurance policy information	Establish insurance coverage and verify safe driving records for employees who drive for Company business; determine qualifications for hiring, promotion, and transfer
Race, gender, date of birth, and other protected class information under California and federal law	Complete EEO-1, Pay Data, AAP, VETS-4212 reporting and all other federal & state reporting as required by law; enforce Equal Opportunity policies; administer employee benefits; conduct voluntary diversity programs



Pre-employment data (e.g., work experience and educational history; letters of reference and contact information for personal and professional references; dispatch and apprenticeship information)	Assess qualifications for hiring, promotion, and transfer
Employee purchase and transaction history	Track employee purchases and discounts for accounting purposes
Health and medical data including notes, certifications, or letters from healthcare providers regarding employee's ability to work or physical and mental restrictions	Establish eligibility for leaves of absence, COVID-19, providing reasonable accommodation, and determining employee physical and mental ability to perform certain job duties consistent with applicable law
Measurement of employee's body temperature	During the COVID-19 pandemic, the company may conduct body temperature screenings with employees to ensure the health and safety of those working at the site. Using CDC guidelines to establish body temperature thresholds, employees testing at a temperature above the threshold will be asked to return home. Royal will maintain all information about employee illness as a confidential medical record in compliance with ADA.
Background check reports compiled in-house or by third parties, including criminal history, reputation, character, personal characteristics, and inferences or compiled profiles regarding the same	Assess qualifications for hiring, promotion, and transfer
Internet or other similar network activity	Ensure security and appropriate use of the Company's systems and employee productivity
Emails, text messages, Teams chat, and other communications drafted or sent from Company email addresses, Company-owned electronic equipment or systems, or personal mobile devices used for Company business	Ensure security and appropriate use of the Company's systems; perform internal Human Resources investigations and review employee performance; general communication purposes



Biometric Information ( <u>e.g.</u> , fingerprints, face mapping or scanning; drug and alcohol screening results; height and weight; clothing size; blood pressure; BMI)	Comply with state, federal and local law regarding fingerprint or other identification measures for security clearances and other reasons as required by law; secure access to Company technology; determine qualifications for hiring, promotion, and transfer; investigate violations of the Company's Drug and Alcohol policy; administer Employee Wellness programs and incentives as permitted by law; provide personal protective equipment, uniforms, or other wearable gear and clothing
Photographs, videos, audio recording	Promote and educate internal and external customers on positions, projects, and Company highlights
Credit and financial information ( <u>e.g.</u> , credit score, credit history, records of bankruptcy, liens, bank account number and routing data)	Assess qualifications for hiring, promotion, and transfer as permitted by law for certain positions and job duties; direct deposit of wages; process wage garnishments; collect payment information for services estimated and performed
Non-public certifications and licenses	Assess qualifications for hiring, promotion, and transfer. Document control for required training and certifications
Performance evaluations and career or job-assessments ( <u>e.g.</u> , personality and aptitude test results and any associated profiles or inferences)	Assess job performance and determine qualifications for hiring, promotion, and transfer

## Record Retention

The Company will retain the categories of personal and sensitive personal information in the table above for as long as we reasonably consider it necessary or for as long as we are required or permitted to retain it under applicable California and Federal law including to satisfy our legal, accounting, payroll and/or reporting obligations.

## Sharing of Personal Information

We may disclose your personal information to a third party for a business purpose. A business purpose means the use of personal information for the Company's operational purpose or business needs that are reasonably necessary and proportionate to achieve the purpose for which information was collected.

When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. These third parties are "Service Providers" and/or "Contractors" as defined by applicable law. The Company may be required to provide personal information in response to valid legal process compelling disclosure.



We only share your relevant information with the following third-party entities:

- **Recruiting and Onboarding Related Service Providers:** Workable, TTI (DISC Assessment), BambooHR, TalentLMS, iSpring, union and apprenticeship program, Alliant, Checkr, On-Site Health & Safety, Concentra, and other drug testing facilities used as needed
- **Benefits Related Service Providers:** John Hancock, Benefit Connect, Benefit Express, BRMS, Cigna, HealthJoy, VSP, Ameritas, WEX, Lincoln, Guardian, Nationwide, ArmadaCare, Lockton
- **Payroll Related Service Providers:** Spectrum, ADP, COMDATA, Square
- **General Company Service Providers:** Royal Electric Co. Website, Microsoft Office Suite, Textedly, HeavyJob, Old Republic/Gallagher Bassett, Salesforce, Procore, Tenna, SambaSafety, LaborChart

## Selling of Personal Information

Royal Electric Co. does not sell any personal or sensitive personal information.

## Conclusion

This policy supersedes all prior policies regarding CCPA and CPRA. We reserve the right to amend this policy and notice, when necessary, at Royal Electric Co.'s discretion. You will be notified of any changes to these terms.

The Company will protect the privacy of information collected in accordance with applicable state, federal and local laws. If you have any questions about the use of your personal and sensitive personal information, please contact Human Resources.