

# CONCEPTUAL MANAGEMENT, INC. dba TRITON CONSTRUCTION

## PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES

Your privacy is important to us. This Privacy Notice sets forth our privacy practices as required by the California Consumer Privacy Act of 2018 (CCPA). This Privacy Notice applies to all job applicants, employees, independent contractors, corporate officers and directors who reside in California. It explains how we collect, use, and share your personal information and how to exercise your rights under the CCPA.

### **Collected information:**

We may collect personal information from you in a variety of different situations, including, but not limited to on our website, your mobile device, through email, in physical locations, through the mail, and/or over the telephone. More specifically, the Company may collect the following categories of personal information from California job applicants, employees, or contractors, which will depend on the business purpose (described in the How We Use Personal Information below) for which we collect it:

<b>Category</b>	<b>Examples (not all inclusive)</b>
A. Personal Information and Identifiers	Name, alias, Social Security Number, date of birth, signature, home address, e-mail address(es), telephone number(s), driver's license or state identification card number, passport number, and other similar identifiers.
B. Demographics	Age, race, ethnicity, gender identification, medical condition, disability status, citizenship, veteran or military status, marital status, family member information.
C. Professional or Employment Information	Salary/compensation, benefits, beneficiary designations, talent management, disciplinary action, employment contract(s), employment history, performance reviews, professional designations, personnel files, training, visa status, business expenses, use of company products, and pre-hire documents (such as job applications, resumes, background check information, drug test information, and candidate evaluations).
D. Education Information	School records, school(s) attended, dates attended, degree(s) earned, academic achievements.
E. Financial Information	Retirement account information, bank accounts, investment or brokerage accounts, information on personal property and real estate, student loans, insurance, information regarding estate or tax planning, debts, trusts, credit or debit card number(s), legal issues (e.g., child support, alimony, wage garnishments and subpoenas), and benefits information.

F. Medical Information	Medical history, medical questionnaires, information regarding physical, mental and/or behavioral health, genetic information, wellness activities and subsidies, health insurance information, information regarding payment for healthcare services.
G. Biometric Information	Fingerprints, facial scans, eye scans, voice recognition, typing cadence, and any other biometric identifier that we may use for security, other operational purposes, or our voluntary wellness program.
H. Internet or Network Activity	Browser history, search history, IP address, mobile device identifier, cookies, use of IT resources, interaction with website, app, advertisements.
I. Geolocation Data	GPS coordinates, location-tracking information, physical location or movements.
J. Profile Information	Profiles reflecting a person's preferences, such as interests, hobbies, physical characteristics or description, characteristic tendencies, behaviors, attitudes, or aptitudes, including inferences drawn from any Personal Information.
K. Product Information	Policy/account number(s), policy/account values, beneficiary, ownership arrangements, transaction history.
L. Audiovisual Information	On-site security cameras, pictures, video and audio recordings

### **We Do Not Sell Your Personal Information:**

We do not rent, sell, or share your personal information with nonaffiliated companies for their direct marketing purposes, unless we have your permission.

### **How We Use Your Personal Information:**

We may use or disclose the Personal Information we collect from you or about you to do one or more of the following:

- Workforce Management such as:
  - To evaluate individuals for a position with us when applying for a position or we receive the individual's information related to a position at the Company.
  - To comply with state and federal laws requiring employers to maintain certain records.
  - To process payroll and manage applicable tax withholding and reporting.

- To administer and maintain group health insurance benefits, additional wellness programs, 401(k) and/or retirement plans, life insurance, disability insurance, leave programs and additional fringe benefit programs.
- To manage and/or analyze all aspects of employee performance of their job duties and employment, including, but not limited to, training, talent management, periodic reviews, performance tracking, promotions, and discipline.
- For surveys, research, analysis and strategic development to implement, maintain and promote an engaging work experience at the Company.
- To review and audit employee interactions with customers and business partners.
- For employee and facility security.
- To support information technology services to the workforce.
- For emergency training and emergency response.
- Research & strategic development such as:
  - Information collected for business, product, strategy, and technological development, excluding Marketing and advertising activities.
- Detecting and Protecting such as:
  - Detecting and protecting against security incidents and malicious, deceptive, fraudulent or illegal activity, or violations of the Company policies or the law.
- For fraud and crime prevention.
- For information protection and cybersecurity.
- Legal/Compliance/Regulatory such as:
  - To meet additional legal, compliance, and regulatory requirements and to defend the Company's rights and property.
- Online auditing such as:
  - Auditing related to a current interaction with our California workforce and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with standards.

### **Your Rights as A California Resident:**

**Right to Know and Access:** You may submit a verifiable request for information regarding the: (1) categories of personal information collected or disclosed by the Company; (2) purposes for which categories of personal information are collected by the Company; (3) categories of sources from which the Company collects personal information; and (4) specific pieces of personal information the Company has collected about you during the past twelve months. This right is subject to certain limitations under the CCPA.

**Right to Request Deletion:** Under the CCPA you have the option to request deletion of Personal Information about you that the Company has collected from you.

However, our legal obligations as an employer require us to maintain certain information.

Right to Opt-Out: The right to opt-out of the “sale” of Personal Information to third parties.

Right to Non-Discrimination: You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

### **Changes to This Policy**

We reserve the right to change this policy from time to time. If we make any changes that materially affect your rights or the ways in which we collect, use or disclose your personal information, we will notify you in advance through written, electronic or other means, as permitted by law.

### **Contact Information**

To exercise your rights under the CCPA, or if you have any questions, comments, or concerns about this policy, please contact please contact our Compton office at (310) 523-2088 or email [mattk@conceptualmgmt.com](mailto:mattk@conceptualmgmt.com).