



CALIFORNIA EMPLOYEE NOTICE AT COLLECTION AND PRIVACY POLICY

SCOPE

This California Employees Notice at Collection and Privacy Policy (“Notice and Policy”) describes ARS National Services Inc.’s (“ARS,” “we,” “us,” or “our”) practices regarding the collection, use, and disclosure of the personal information of job applicants, employees, independent contractors, owners, directors, and officers of ARS who are California residents (“Employees”), describes the rights of Employees under the California Consumer Privacy Act and implementing regulations as amended from time to time (“CCPA”), and explains how Employees may contact ARS to exercise those rights.

The privacy practices described in this Notice and Policy are effective as soon as posted or provided to you as indicated by the Last Updated date below. Should we change any of the practices described in this Notice and Policy, we will notify you by posting the changes to this website or as otherwise required by applicable law. Your continued employment with us following any such changes will constitute your agreement to these privacy practices.

An Important Note: This Notice and Policy only applies to data that we collect and process when interacting with you in your capacity as an Employee. Unless otherwise indicated on a specific website page or form, this Notice and Policy does not apply to any of the personal information that we process through your use of our public-facing websites, applications, or services, which are subject to our user Privacy Policy (available <https://www.arsnational.com/>).

HOW WE COLLECT PERSONAL INFORMATION

ARS collects personal information about Employees from the following sources: Employees, service providers, contractors, IT systems and environments, and third parties.

We may also collect personal information about an Employee’s spouse, dependents, beneficiaries, emergency contacts, and other individuals relevant to the Employee.

PERSONAL INFORMATION WE COLLECT

ARS may collect the following types of personal information about you:

- **Identifiers**, such as real name, alias, postal address, unique personal identifier, email address, account name, or other similar identifiers;
- **Characteristics of protected classifications under California or federal law**, such as sex, national origin, or age;
- **Commercial information**, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- **Biometric information**;
- **Internet or other electronic network activity information**, such as, browsing history, internet protocol address, search history, or other information regarding your interaction with an internet website, application, or advertisement;
- **Geolocation data**;
- **Audio, electronic, visual, or similar information**, such as voice and video recordings;
- **Professional or employment related information**, such as job history or performance evaluations;
- **Education information**, such as educational institutions attended or grade point average;
- **Other Personal information described in Cal. Civ. Code § 1798.80(e)**, such as signature, physical characteristics or description, insurance policy number, financial information, or health insurance information;
- **Sensitive Personal Information**, such as social security number, driver’s license number, passport number, health information, handicaps, race, religion, or color; and



- **Inferences** drawn from any of the information identified in this section to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

HOW WE USE YOUR INFORMATION

We process personal information for a variety of business purposes including:

- Performing human resource functions, including processing job applications, administering benefits, processing payroll, conducting analytics in an employee context, or managing other aspects of an employment relationship including, but not limited to, the establishment, maintenance, and termination of employment relationships.
- Determining eligibility for initial employment, including the verification of references and qualifications.
- Processing background checks of new applicants and existing Employees.
- Managing the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence, and maintenance of emergency and beneficiary contact information.
- Processing Employee work-related claims (e.g., worker compensation, insurance claims, etc.).
- Conducting training, taking disciplinary action, addressing injuries, and other employment related incidents.
- Providing a safe work environment.
- Administering our occupational safety and health programs.
- Assisting you with obtaining immigration or work documentation, when required.
- Maintaining directories of Employees.
- For employee-related programs, including surveys and voluntary programs.
- Investigating and responding to claims against us.
- Complying with legal obligations and protecting our rights and the rights of others;
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance.
- Performing services on behalf of Company, including maintaining or servicing accounts, providing services, verifying information, processing payments, providing storage, or providing similar services on behalf of Company.
- Providing advertising and marketing services, except for cross-context behavioral advertising, to the Employee provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out Employees that the service provider or contractor receives from, or on behalf of, Company with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with Employees.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Company, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Company.
- Helping to ensure security and integrity to the extent the use of the Employee's personal information is reasonably necessary and proportionate for these purposes.
- For all other internal uses that are reasonably aligned with the expectations of our prospective and existing Employees.
- To assess your suitability, aptitude, skills, qualifications, and interests for employment with or provision of services to ARS; and
- As you otherwise agree or consent.

HOW WE DISCLOSE YOUR INFORMATION

We may disclose your information as described in this Notice and Policy (e.g., with our third-party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.



- **We Use Vendors and Service Providers.** ARS may disclose any information we receive with vendors and service providers. The types of service providers to whom we entrust personal information include service providers for: (i) maintaining our human resources operations; and (ii) the provision of IT and related services.
- **Affiliates and Subsidiaries.** ARS may disclose personal information with our affiliates and subsidiaries for our and our affiliates’ and subsidiaries’ internal business purposes.
- **Displaying to Other Individuals.** When you post content about yourself to the intracompany site(s), other individuals may be able to see some information about you, such as your name and/or picture in addition to the content you post. While we expect all Employees to follow the ARS’s Code of Conduct, we are not responsible for practices of the individuals who view and use your information.
- **Disclosures to Protect Us or Others.** We may access, preserve, and disclose your personal information if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal processes, such as court orders or subpoenas; (ii) protect your, our, or others’ rights, property, or safety; (iii) enforce our policies or contracts; (iv) collect amounts owed to us; or (v) assist with an investigation or prosecution of suspected or actual illegal activity.
- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another entity, your information may be transferred as part of such transaction as permitted by law and/or contract.

For any of the above business purposes, we may disclose any of the categories of personal information that we collect about Employees to service providers, contractors, affiliates, and other third parties. The following table describes the categories of personal information ARS has collected and the categories of third parties to which such information has been disclosed for a business purpose in the preceding 12 months:

Category of Personal Information Collected by ARS	Category of Third Parties to which Information is Disclosed
Identifiers , such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • HR Service Providers (e.g., process payroll, background checks, workforce management, operations, etc.) • Government Entities (e.g., when required by law for tax purposes)
Characteristics of protected classifications under California or federal law , such as sex, national origin, or age.	<ul style="list-style-type: none"> • HR Service Providers (e.g., process payroll, background checks, workforce management, operations, etc.) • Government Entities (e.g., when required by law for tax purposes)
Commercial information , such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • HR Service Providers (e.g., process payroll, background checks, workforce management, operations, etc.)
Biometric information.	<ul style="list-style-type: none"> • IT Service Providers supporting remote work
Internet or other electronic network activity information , such as, browsing history, search history, or other information regarding a consumer’s interaction with an internet website, application or advertisement.	<ul style="list-style-type: none"> • HR Service Providers (e.g., process payroll, background checks, workforce management, operations, etc.) • IT Service Providers (e.g., Internet service provider)
Geolocation data.	<ul style="list-style-type: none"> • IT Service Providers

Audio, electronic, visual, thermal, olfactory, or similar information , such as voice recordings.	<ul style="list-style-type: none"> • Clients of the Company to which the recording relates • Government Entities (e.g. when required by law) • IT Service Providers
Professional or employment related information , such as job history or performance evaluations.	<ul style="list-style-type: none"> • Clients of the Company as may be required to substantiate background check completion
Education information , such as institutions attended or grade point average.	<ul style="list-style-type: none"> • Clients of the Company as may be required to substantiate background check completion
Other Personal information described in Cal. Civ. Code § 1798.80(e) , such as signature, physical characteristics or description, insurance policy number, financial information, or health insurance information.	<ul style="list-style-type: none"> • HR Service Providers (e.g., process payroll, background checks, workforce management, operations, etc.) • Government Entities (e.g., when required by law for tax purposes)
Sensitive Personal Information , such as health information, handicaps, race, religion, or color.	<ul style="list-style-type: none"> • HR Service Providers (e.g., process payroll, background checks, workforce management, operations, etc.) • Government Entities (e.g., when required by law for tax purposes)
Inferences drawn from any of the information identified in this section to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	<p style="text-align: center;">Not disclosed.</p>

SENSITIVE PERSONAL INFORMATION

Processing of sensitive personal information is carried out exclusively for the purposes outlined above, to the extent permitted under applicable law. As indicated in the chart above, this processing activity may include service providers and government entities.

DATA SUBJECT RIGHTS

This section describes your rights under the CCPA. For information on how you may contact ARS to exercise these rights, please see the section below entitled, "How to Submit a Request."

- **Right to Know:** You have the right to request that a business disclose what personal information it collects, uses, discloses, or sells. Specifically, you may request that a business that collects personal information about you disclose to you the following:
 - (1) The categories of personal information it has collected about you in the preceding 12 months.
 - (2) The categories of sources from which the personal information is collected.
 - (3) The business or commercial purpose for collecting or selling personal information.
 - (4) The categories of third parties with whom the business shares personal information.
 - (5) The specific pieces of personal information it has collected about you in the preceding 12 months.
 You may also request that a business that sells your personal information, or that discloses it for a business purpose, disclose to you:
 - The categories of personal information that the business collected about you in the preceding 12 months.



- The categories of personal information that the business sold about you and the categories of third parties to whom the personal information was sold in the preceding 12 months, by category or categories of personal information for each third party to whom the personal information was sold.
- The categories of personal information that the business disclosed about you for a business purpose in the preceding 12 months.
- **Right to Correct Inaccurate Personal Information:** You have the right to request that a business correct any inaccurate personal information about you which the business has collected from you. If we determine that we cannot comply with your request when you request us to do so, we will inform you and tell you why we are not correcting it.
- **Right to Request Deletion:** You have the right to request that a business delete any personal information about you which the business has collected from you. If it is necessary for ARS to maintain the personal information for certain purposes, ARS is not required to comply with your deletion request. If we determine that we will not delete your personal information when you request us to do so, we will inform you and tell you why we are not deleting it.
- **Right to Opt-Out of Sale or Sharing of Personal Information:** You have the right to opt-out of the sale or sharing of your personal information. However, ARS does not and will not sell or share your personal information. ARS has no actual knowledge that it sells or shares the personal information of anyone under 16 years of age.
- **Right to Opt-Out of Use and Disclosure of Sensitive Personal Information:** You have the right to opt-out of the use and disclosure of your sensitive personal information. If ARS collects or processes sensitive personal information with the purpose of inferring characteristics about Employees, ARS will respond to such requests by restricting any further use of the Employee's sensitive personal information to those uses which are necessary to continue the employment relationship as reasonably expected by an average Employee and to perform the services permitted by applicable law.
- **No Discrimination:** You have the right not to be discriminated against because you exercised any of your rights under the CCPA.

HOW TO SUBMIT A REQUEST

To exercise the rights described above, you must submit a verifiable request to us by contacting ARS at 888-964-5506 or by sending an email to hrgs@arsnational.com. You may submit a request as frequently as you would like, but we are not required to respond to requests to provide personal information to you more than twice in any 12-month period.

Request Verification. To protect your privacy, we will take steps to reasonably verify your identity before fulfilling your request. These steps may involve asking you to provide government-issued identification that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent, or to answer questions regarding your employment. The information we ask you to provide to initiate a request may differ depending upon the type of request; the type, sensitivity, and value of the personal information that is the subject of the request; and the risk of harm to you that may occur as a result of unauthorized access or deletion, among other factors. We may also require you to provide a written declaration that you are who you say you are.

If we cannot verify your identity or authority to make the request, we will not be able to comply with your request. We will inform you if we cannot verify your identity or authority. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

Authorized Agent Requests. Only you, or someone legally authorized to act on your behalf, may make a verifiable request related to your personal information. You may also make a verifiable request on behalf of your minor child if the minor child is employed by ARS. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth below.



SECURITY

We use data storage and security techniques to protect your personal information from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss. However, it is important to remember that no website, network or server can be 100% secure and we cannot be held responsible for unauthorized or unintended access that is beyond our control.

RETENTION OF YOUR INFORMATION

We apply a general rule of keeping personal information only for as long as required to fulfil the purposes for which it was collected. However, in some circumstances we may retain personal information for longer periods of time, for instance when we are required to do so in accordance with legal, tax, and accounting requirements. In specific circumstances, we may also retain your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

ARS retains the personal information we receive as described in this Privacy Notice for as long as necessary to fulfill the purpose(s) for which it was collected, carry out our human resources operations, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, comply with applicable laws, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data. Additionally, we endeavor to retain all such personal information in accordance with legal requirements.

THIRD PARTY WEBSITES/APPLICATIONS

Various resources and sites at ARS may contain links to third party websites or applications and other websites or applications may reference or link to ARS. These third-party services are not controlled by us. We encourage Employees to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and we are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

CONTACT

If you have any questions or concerns about ARS's privacy policy or practices, please contact us at hr@arsnational.com.

If you have a disability that prevents or limits your ability to access these privacy disclosures, please contact us so we can work with you to provide these disclosures in an alternative format.

Last updated: May 12, 2023