

Privacy Notice for California Employees and Job Applicants

Effective Date: January 1, 2020

Last Reviewed on: January 1, 2023

This **Privacy Notice for California Employees and Job Applicants** applies solely to employees, contractors and job applicants of HH Associates US, Inc. (“Company”) who reside in the State of California (“you”). The Company adopts this notice to comply with the California Consumer Privacy Act (CCPA) and any amendments, and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information from our employees, contractors and job applicants that identify, relate to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee, contractor or job applicant (“personal information”). In particular, Company has collected the following categories of personal information from its employees within the last twelve (12) months:

Category	Examples ¹	Collected	Purpose	Third Parties Shared	Retention Period
A. Identifiers.	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.	YES	(a) Performance of a contract (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Human resources information service providers (b) Financial investment service providers (c) Wellness program service providers (d) Insurance providers (e) Payroll service providers (f) Government entities or regulators	Records are retained for 7 years after termination of employment relationship
B. Personal information categories listed in the California Customer Records statute (Cal.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state	YES	(a) Performance of a contract (b) Necessary for our legitimate interests (c) Necessary to comply with	(a) Human resources information service providers (b) Financial investment service providers (c) Wellness program service providers	Records are retained for 7 years after termination of employment relationship

¹ Some personal information included in the categories may overlap with other categories.

Civ. Code § 1798.80(e).	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.		a legal obligation	(d) Insurance providers (e) Payroll service providers (f) government entities or regulators	
C. Protected classification characteristics under California or federal law.	Race (which includes historically associated traits, such as hair styles and protective hair styles, e.g., braids, locks, and twists), religious creed (which includes religious dress and grooming practices), color, national origin (which includes, but is not limited to, national origin groups and aspects of national origin, such as height, weight, accent, or language proficiency), ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (which includes pregnancy, childbirth, breastfeeding, and related medical conditions), gender, gender identity, gender expression, age,	YES	(a) Performance of a contract (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Human resources information service providers (b) Financial investment service providers (c) Wellness program service providers (d) Insurance providers (e) Payroll service providers (f) government entities or regulators	Records are retained for 7 years after termination of employment relationship

	sexual orientation, military or veteran status (including state and federal active and reserve members as well as those ordered to duty or training), immigration/citizenship status or related protected activities (which includes undocumented individuals and human trafficking), protected medical leaves, domestic violence victim status, or any other category or activity protected by federal, state, or local laws, ordinances, or regulations.				
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	N/A	N/A	N/A
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep.	NO	N/A	N/A	N/A

	health, or exercise data.				
F. Internet or other similar network activity.	Browsing history, search history, information on your interactions with a website, application, or service.	YES	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation	(a) Analytics and business intelligence vendors (b) Security vendors	Records are retained for 7 years after termination of employment relationship
G. Geolocation data.	Physical location or movements.	YES	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation	(a) Analytics and business intelligence vendors (b) Security vendors	Records are retained for 7 years after termination of employment relationship
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	N/A	N/A	N/A
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES	(a) Necessary for our legitimate interests	(a) Human resources information service providers	Records are retained for 7 years after termination of employment relationship
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	N/A	N/A	N/A

K. Inferences drawn from other personal information.	Profile or personality tests reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	N/A	N/A	N/A
L. Sensitive personal information	Personal information that reveals government IDs; information providing access to a financial account; racial or ethnic origin; personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.	Yes, however information is collected and used consistent with the permissible uses under the CCPA	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation	(a) Human resources information service providers (b) Financial investment service providers (c) Government entities or regulators	Records are retained for 7 years after termination of employment relationship

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

HH Global obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or by communicating with us by post, phone, email or otherwise.
- Indirectly from you. For example, from observing your actions on our computer systems or other platforms.

- Third parties. For example, from vendors we use for background checks.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, to conduct payroll or timekeeping activities or administer benefits.
- To fulfill our legal obligations as a subcontractor to the U.S. federal government.
- To manage employee performance of their job duties.
- To investigate and help prevent fraud or otherwise ensure compliance with policies and procedures.
- To provide you with support and to respond to your inquiries, including to investigate and address your workplace concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our systems, services, databases and other assets.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our users is among the assets transferred.

Company will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosure of Personal Information

We may share your personal information for business purposes by disclosing it to the categories of third parties identified in the chart above. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

We do not sell or share (as the term is defined in the CCPA²) your personal information.

We also do not disclose or use sensitive personal information outside of the permissible uses identified within the CCPA.

² The CCPA defines "sharing" as communicating personal information to a third party for cross-context or targeted behavioral advertising.

Your Rights and Choices

You have rights regarding your personal information. This section describes the rights you have and explains how to exercise those rights.

Access to Specific Information

You have the right to request that HH Global disclose certain information to you about our collection and use of your personal information over the past 12 months, including:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose, identification of the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that HH Global delete any of your personal information that we collected from you and retained, subject to certain exceptions. If an exception applies, we will advise you of the applicable exception and the reason for denying your request.

Correction Request Rights

You have the right to request that HH Global correct any inaccurate personal information we may hold about you. We will use commercially reasonable efforts to correct inaccurate personal information, taking into the account the nature of the personal information and the purpose for our processing.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Exercising Your Rights

To exercise your rights described above, please submit a request by either:

- Sending an email to hr.usacanada@hhglobal.com
- Calling us at 312-642-3700

We may need to validate your request. In order to validate your request, we may ask you for the following information email address, telephone number, or other identifying information such as your date of birth. Only you or an authorized agent may make a request related to your personal

information. To designate an authorized agent to make a request on your behalf, please complete the following form [here](#) or provide us with a power of attorney or other legally binding written document signed by you and identifying your agent. We may also verify the identity of your designated agent.

Commented [ZR1]: HR - YOU NEED TO HYPERLINK THIS TO THE VERIFICATION FORM I SENT YOU SEPARATELY BY EMAIL

Changes to This Privacy Notice

Company reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will provide you with notice and post a copy of the of the updated notice on the Policies and Procedures Section of the Company’s HR Intranet Site and update the notice’s effective date.

Questions About This Privacy Notice

If you have any questions or comments about this notice or the ways in which Company collects and uses your information, please contact:

HH Associates US, Inc.
General Counsel
203 North LaSalle, Suite 1800
Chicago, IL 60601
Email: data.protection@hhglobal.com