

Notice at Collection and Privacy Policy for California Job Applicants

Last Updated: **5/04/2023**

Adams Group, Inc. (“the Company”) and its subsidiaries and affiliated companies takes your privacy seriously. We want you to know how we collect, use, and disclose, your personal information.

California Notice at Collection: The Company collects the personal information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 5. We do not sell your personal information or disclose it for cross-context behavioral advertising (“sharing”). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

EEO Statement

The Company is an equal employment opportunity employer. Our policy is not to unlawfully discriminate against any applicant or employee on the basis of race, color, sex, religion, national origin, age, disability, or any other consideration made unlawful by applicable federal, state, or local laws. The Company also prohibits harassment of applicants and employees based on any protected category, characteristic or status. It is also the Company’s policy to comply with all applicable state, federal and local laws respecting consideration of unemployment status in making hiring decisions.

The Company complies with the ADA, the ADAAA and applicable state law and considers reasonable accommodation measures that may be necessary for qualified applicants/employees to perform the essential functions of the job. Hire may be contingent upon a post-offer medical examination, and to skill and agility tests, as appropriate for the position.

Assistance For the Disabled

Alternative formats of this Privacy Policy are available to individuals with a disability. Please contact **530-668-2000** for assistance.

This Privacy Policy explains:

1. The categories of personal information we collect about you
2. The categories of sources from which we collect your personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. How long we keep your personal information
6. Your rights and how to exercise them
7. Changes to this Privacy Policy

Scope:

This Privacy Policy applies to the personal information of California residents in their role as job applicants to the Company (“**Applicants**”).

“Personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Applicant.

“Personal information” does not include:

- Information publicly available from government records or made publicly available by you or with your permission;
- Deidentified or aggregated information;
- Information excluded from the CPRA’s scope, such as:
 - protected health information covered by the Health Insurance Portability and Accountability Act (“HIPAA”) or the Health Information Technology for Economic and Clinical Health Act (“HITECH”) or medical information covered by California Confidentiality of Medical Information Act (“CMIA”); or

- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), or the California Financial Information Privacy Act (“FIPA”).

1) THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect the following categories of personal information. Not all categories may be collected about every Applicant.

- **Identifiers**, for example: real name, nickname, telephone number, postal address, e-mail address, date of birth, Social Security number, and signature.
- **Professional or Employment-Related Information**, for example: educational institutions attended, degrees and certifications, licenses, work experience and previous employers, and professional memberships and affiliations.
- **Non-public educational information** such as academic transcripts.
- **Internet or Other Electronic Activity Information**, for example: email correspondence, interactions with Company’s Internet web site, job application, or job advertisement, and publicly available social media activity.
- **Sensory or Surveillance Data**, for example: voice-mails and footage from video surveillance cameras.
- **§ 1798.80**: personal information described under Cal. Civ. Code § 1798.80 to the extent not already included in other categories in this section, such as a photograph or health information, for example, to conduct pre-employment physical examinations.
- **Characteristics of Protected Classifications Under California or Federal Law for Applicants** is collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations, for diversity and inclusion reporting and related purposes.

Note on inferring characteristics: The Company does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about the Applicant.

2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

We may collect the following categories of personal information. Not all categories apply to every Applicant.

- **You:** Information you share on your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process.
- **Vendors and service providers:** Recruiters, applicant tracking system
- **Third parties:** job references, affiliated companies, professional employer organizations or staffing agencies.
- **Automated technologies** on Company’s electronic resources, for example, to track logins and activity on the Company’s careers page.
- **Surveillance/recording technologies installed by the Company**, for example, video surveillance in common areas of Company facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law
- **Government or administrative agencies**, for example, law enforcement or public health authorities.
- **Acquired company**, if our Company acquired your employer, the Company might collect personal information from that employer.

3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

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

A. Generally Applicable Purposes

Unless stated otherwise in section 3.B below, we may use Applicants’ personal information for the following purposes:

Recruiting, including:

- To evaluate Applicants' qualifications or suitability for employment with Company
- To communicate with Applicants
- To conduct a pre-employment or criminal history background check
- For identification purposes
- For diversity and inclusion purposes
- To arrange and manage Company-sponsored events
- To create a talent pool for future job openings
- To demonstrate Applicants' agreement to, or acceptance of, documents presented to them, *e.g.*, acknowledgment of employment application, offer letter, background check authorization, pre-employment drug test authorization
- To evaluate and improve the recruiting process
- To promote the Company as a place to work

Monitoring, Security, and Compliance, including:

- To monitor and protect Company facilities and information systems
- To ensure compliance with applicable laws and Company policies
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

Conducting Our Business, including:

- For training purposes or quality assurance with respect to Company employees conducting the interviews or otherwise assisting with the recruiting and hiring process
- To engage in crisis management
- To manage travel arrangements if needed and/or travel related reimbursements

Miscellaneous Other Purposes:

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning;
- To manage litigation involving the Company, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of the Company or any of its subsidiaries or affiliates; and
- To protect the rights, property, or safety of the Company, its Applicants, customers or others.

B. Purposes Specific to Certain Categories of Personal Information

We may use the categories of Applicants' personal information listed in this Section 3.B for the purposes stated below:

Purposes For Using Applicant Health Information:

- To the extent necessary to comply with the Company's legal obligations, such as to accommodate disabilities
- To protect the health and safety of the Company's employees and facilities
- To conduct pre-employment medical examinations
- To respond to an Applicant's medical emergency

Purposes For Using Applicants' Protected Categories of Information:

The Company collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act and California's Fair Employment and Housing Act, and for purposes of diversity analytics.

The Company also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and California law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

The Company collects protected categories of personal information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

C. Deidentified Information

At times, the Company converts personal information into deidentified information using reasonable measures to ensure the deidentified information cannot be associated with the individual (“Deidentified Information”). The Company maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except the Company may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual.

4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

The Company generally maintains personal information related to Applicants as confidential. However, from time to time, the Company may have a legitimate business need to disclose Applicants’ personal information. In that event, the Company discloses your personal information listed in Section 1, above, only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by the CPRA and other applicable laws.

A. Disclosures for Business Purposes

The Company may disclose each of the categories of personal information listed in Section 1, above, to the third parties listed below for the following “business purposes” as that term is defined under the CPRA.

- **Service providers:** The Company may disclose to service providers any of the categories of personal information listed in Section 1, above, for the business purpose of performing services on the Company’s behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by the Company:** The Company may disclose the categories of personal information listed in Section 1, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on the Company’s behalf.
- **Affiliated companies:** The Company may disclose any of the categories of personal information listed in Section 1, above, to other companies within the **Adams Group family** of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) short-term transient use, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

B. No Sales or Sharing

The Company does not sell or “share” (disclose for cross-context behavioral advertising) your personal information in connection with the application process. In addition, we have no actual knowledge we sell or share the personal information of individuals of any age in connection with the application process, including the personal information of children under 16.

C. Disclosures to Others

The Company may disclose personal information to the following additional categories of third parties although these disclosures may be for purposes in Section 3, above, other than a business or commercial purpose as defined by the CPRA:

- **Your direction:** We may disclose your personal information to third parties at your direction.

- **Affiliated companies:** Other companies within the **Adams Group family** of companies, for example, to evaluate an applicant for a cross-enterprise team or position.
- **Government or administrative agencies:** These may include, for example, the Equal Employment Opportunity Commission as required for reporting.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Company, our users, or others.
- **Corporate Transactions:** We may disclose your personal information in connection with a corporate merger, consolidation, bankruptcy, the sale of all, or substantially all, of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

If Company hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. Company will retain this application information for the entire duration of your employment relationship with Company and for as long thereafter as permitted or required by applicable law. Company makes its document retention schedule available to employees for review.

Company will retain information of applicants who are not hired for four (4) years after the record is collected. These records will be retained for our internal recordkeeping and reporting purposes in compliance with California Government Code § 12946. During that time, we may use your information to consider you for positions in addition to the position(s) for which you initially applied.

6) YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM

A. Your California Privacy Rights

Subject to applicable law, Applicants have the following rights:

- **Right to Know:** You have the right to submit a verifiable request up to twice in a 12-month period for specific pieces of your personal information obtained from you and for information about Company's collection, use, and disclosure of your personal information.

Please note that the CPRA's right to obtain "specific pieces" does not grant a right to the whole of any document that contains personal information, but only to discrete items of personal information. Moreover, Applicants have a right to know categories of sources of personal information and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients.

- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to Company.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by Company, taking into account the nature of the personal information and the purposes of processing the personal information.
- **Right to Restrict Use and Disclosure of Sensitive Personal Information:** You have the right to restrict Company's use and disclosure of your sensitive personal information to purposes permitted under the CPRA, such as security, quality control, uses required by law, and disclosures to vendors in support of the permitted purposes. This right only applies to sensitive personal information collected or processed by Company for the purpose inferring characteristics about you. As noted above, Company does not collect or process your sensitive personal information for the purpose inferring characteristics, and therefore this right does not apply.

B. How to Exercise Your Rights

The Company will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call **530-668-2000** or by
- Email CCPA@adamsgrp.com

C. How We Will Verify Your Request

We match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

D. Authorized Agents

If an authorized agent submits a request on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity. You can obtain the "Authorized Agent Designation" form by contacting us at CCPA@adamsgrp.com. This provision does not apply if you have provided a power of attorney compliant with the California Probate Code.

E. Company's Non-Discrimination and Non-Retaliation Policy

The Company will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the California Privacy Rights Act.

7) CHANGES TO THIS PRIVACY POLICY

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

For More Information

For questions or concerns about Company's privacy policies and practices, please contact us at CCPA@adamsgrp.com.