

## **CCPA Notice for California Employees and Applicants**

**Effective Date:** February 15, 2021

**Last Updated on:** May 10, 2024

This CCPA Notice for California Employees and Applicants (the “**California Notice**”) describes the categories of personal information collected by INW Manufacturing, LLC and its subdivisions, divisions, and affiliates (the “Company,” “us,” “we,” or “our”) and the purposes for which such information may be collected and used. It also provides information concerning the Company’s record retention practices and rights you may have under the California Consumer Privacy Act (“CCPA”). For more complete information about the Company’s Privacy Policy, please see <https://www.inwmfg.com/privacy>.

We retain your personal information for as long as necessary to process your application for employment, administering employment related practices, and in accordance with the Company’s data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal obligations or reporting obligations, resolve disputes, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal Information does not include certain categories of information, such as publicly available information from government records, deidentified or aggregated consumer information, and information subject to HIPAA or the California Confidential Medical Information Act.

### **Categories of Personal Information We Will Collect**

The Company may collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“**personal information**”). In particular, we may collect the following categories of personal information from you:

- A. **Identifiers**, such as name, postal address, unique personal identifier, online identifier, Internet Protocol address (when you access our network resources), email address, username, Social Security number, driver’s license number, passport number, or other similar identifiers.
- B. **Personal information (PI) as defined in California’s Consumer Records law**, such as name, signature, Social Security number, address, telephone number, insurance policy number, health insurance information, education and/or employment-related information (including employment history), bank account number or other financial information, or driver’s license or state identification card number (*if provided by you as part of your business travel profile*).
- C. **Protected classification characteristics under California or federal law**, such as age (40 years or older) (to provide you with health and retirement benefits), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status. *We require your age to verify your identity and to provide you with health and retirement benefits. All other information is optional, and we will collect this information only to the extent you choose to provide it.*
- D. **Biometric information**, such as fingerprints, faceprints, iris or retina scans.
- E. **Internet or other electronic network activity information**, such as browsing history, search history, and information regarding a consumer’s interaction with a website or application.

- F. **Professional or employment-related information**, such as employment eligibility verification, background check results, drug test results, current or past job history or performance evaluations.
- G. **Educational information**. This category includes education history.
- H. **Sensitive Personal Information**. This category includes sensitive information such as social security, driver's license, state identification card, or passport number; financial account information that allows access to an account, including log-in credentials, financial account numbers, passwords, etc.; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; content of mail, email, and text messages unless the Company is the intended recipient of the communication; genetic data; biometric information for the purpose of uniquely identifying a consumer; and information concerning health and sex life or sexual orientation.

#### **Sources and Disclosures of Personal Information**

For information on the sources of personal information we collect and the categories of third parties to whom we may **disclose personal information**, please see the Company's Privacy Policy at [www.inwmfg.com/privacy](http://www.inwmfg.com/privacy).

To carry out the purposes outlined in this California Notice, the Company may disclose information with third parties or service providers, such as background check vendors, third-party staffing vendors and information technology vendors, outside legal counsel, and state or federal governmental agencies.

The Company does not sell or share, as those terms are defined under applicable law, the above categories of Personal Information. We also do not use or disclose your sensitive personal information for purposes that, with limited exceptions, are not necessary to maintain the employment relationship as reasonably expected by an average employee. The Company may add to the categories of personal information it collects and the purposes it uses personal information. In that case, the Company will inform you.

#### **Purposes Personal Information, Including Sensitive Personal Information, is Used**

We may use or disclose the personal information, including sensitive personal information, we collect for one or more of the following business or commercial purposes:

- pre-employment processing such as employment applications, eligibility verification, background and related checks, onboarding and related recruiting efforts;
- delivering or administering pay and benefits, including insurance benefits;
- maintain physician records and occupational health programs;
- maintaining personnel records and record retention requirements;
- delivering training programs, and measuring and recording the results of training;
- communicating with the Company's personnel;
- maintaining information about your work history, work performance, and disciplinary actions;
- maintaining the security and safety of our facilities, personnel, and other assets, including to authenticate personnel to access the Company's IT resources and facilities, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- providing employment programs such as on-site health services, leave of absence, company cars,

pension schemes, stock options, and other similar benefits;

- to comply with applicable state and federal health, labor, employment, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations;;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- to facilitate other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, mergers and acquisition activities; and maintenance of licenses, permits and authorization applicable to Company operations;
- in order to publish your name, picture, and contact information in our internal employee directory and, for leadership positions, to publish your online biography and for similar marketing efforts in accordance with the Company's policies;
- and
- as described to you when collecting your personal information or as otherwise set forth in the CCPA.

#### **California Residents Individual Rights Requests**

The CCPA provides individuals who are residents of the State of California with various privacy-related rights. These rights and how to exercise them are described more fully in the Company's Privacy Policy at <https://www.inwmfg.com/privacy>.

#### **Submitting a Consumer Rights Request:**

To submit a California Consumer Rights request as outlined in the Company's Privacy Policy, please contact the Company's Human Resources Department by calling us at (707) 752- 9010 or emailing us at:

Pro-Form Manufacturing, LLC - (707) 752- 9010 or [hrdirector@proformlabs.com](mailto:hrdirector@proformlabs.com).

INW Living Ecology Opco, LLC – (702) 826-4446 #4003 or [LE-HR@inwmfg.com](mailto:LE-HR@inwmfg.com)

We reserve the right to only respond to verifiable consumer requests to know, delete, or correct.

#### **Changes to this California Notice**

The Company reserves the right to amend this California Notice at our discretion and at any time. When we make changes to this California Notice, we will notify you regarding updated notice through the Company's communication channels, including through email or paper notices.

#### **Contact Information**

If you have any questions or comments about this California Notice and the ways in which the Company collects and uses your information described above, please do not hesitate to contact Human Resources at:

Pro-Form Manufacturing, LLC - (707) 752- 9010 or [hrdirector@proformlabs.com](mailto:hrdirector@proformlabs.com).

INW Living Ecology Opco, LLC – (702) 826-4446 #4003 or [LE-HR@inwmfg.com](mailto:LE-HR@inwmfg.com).