



PRIVACY NOTICE FOR CALIFORNIA RESIDENTS Effective January 1, 2020

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (“Privacy Notice”) is being provided by Zenith American Solutions, Inc., its subsidiaries and affiliates (collectively, “we”, “us” or “our”). This Privacy Notice supplements and is expressly made part of the information contained in our Privacy Policy ([ZAS Privacy Policy](#)). This Privacy Notice applies solely to visitors, users, and others who reside in the State of California who are job applicants, employees, independent contractors, corporate officers and directors (“California workforce” or “you”). This Privacy Notice is intended to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws, as applicable. Any capitalized terms in this Privacy Notice are given the same definition as those terms are defined in the CCPA.

Respecting your privacy is an essential part of our privacy program. We are committed to the proper handling of the Personal Information Collected or Processed in connection with your employment relationship with us. This disclosure describes categories of Personal Information we Collect and the purposes for which we Process that information in accordance with section 1798.100(b) of the CCPA. The CCPA defines Personal Information as categories of information that identifies, relates to, describes or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a particular individual or household.

Information We Collect

Over the past twelve (12) months, we have Collected the following categories of Personal Information:

Category	Examples	Collected
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
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state 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. Some Personal Information included in this category may overlap with other categories	Yes
C. Protected classification characteristics under California or federal law	Age (40 years or older), 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, genetic information (including familial genetic information).	Yes

D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	No
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, health, or exercise data.	No
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	No
G. Geolocation data	Physical location or movements	No
H. Sensory data	Audio, electronic, visual, thermal, olfactory or similar information	No
I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes
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	Yes
K. Inferences drawn from other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Yes

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated Consumer 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 (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Sources of Information Collected

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or Services you use.
- Indirectly from you. For example, from observing your actions on our Websites or from information your computer or mobile device transmits when interacting with our website or mobile applications, among other things.
- Third parties. For example, employee unions; staffing; and recruiting agencies, consumer reporting agencies and laboratories who perform employee background screenings on our behalf.

Personal Information is Collected for the following purposes:

1. To comply with state and federal laws and regulations;
2. To process payroll, union dues and other voluntary employee deductions;
3. To track time and attendance;
4. To manage workers' compensation claims;
5. To administer and maintain benefits, including group health insurance;
6. To administer and maintain retirement service;
7. To manage employee performance of their job duties, including promotions, discipline, and/or termination;
8. To conduct workplace investigations;
9. To evaluate job applicants and candidates for employment;
10. To perform pre-employment screenings;
11. To grant and monitor employees' access to secure company facilities;
12. To implement, monitor, and manage electronic security measures on devices that are used to access networks and systems (e.g., incident management);
13. To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company;
14. To maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance;
15. To anonymize and/or aggregate data to perform workforce analytics, data analytics, and benchmarking;
16. To review and audit employee interactions with callers (e.g. members, providers, vendors)

Disclosure of Personal Information

Sharing Personal Information

We may share your Personal Information with the following categories of third parties for a Business Purpose:

- Service Providers
- Third parties with whom you direct us to share your Personal Information
- Other third parties, such as employee unions pursuant to law, and to consumer reporting agencies when we perform employee pre-screenings

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a Business Purpose:

- Category A: Identifiers.
- Category B: California Customer Records Personal Information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category I: Professional or employment-related information.
- Category K: Inferences drawn from other Personal Information

Do Not Sell My Personal Information

Under the CCPA, a business that Sells California residents' Personal Information to others: (1) must give notice to California residents before Selling their Personal Information to others; and (2) must provide the right to opt out of the Sale of their Personal Information.

We do not Sell Personal Information; therefore, these notification and opt-out requirements do not apply to us.

Rights to your Personal Information

You have a number of legal rights when it comes to your Personal Information, including the right to be informed about the Personal Information we Collect and the purposes for which we use your Personal Information.

At this time, any right to request access to, or deletion of, any Personal Information we hold about you is not applicable. You may, however, have access to certain personnel details to verify the accuracy of, or to update your Personal Information. You may contact your local HR representative for additional privacy rights you may have available to you as an employee.

As detailed in our information security policies, you have no right to privacy in your use of our information technology resources, including emails and communications for work purposes which constitute business records and that are monitored and may be reviewed or disclosed at any time without advance notice for purposes of compliance, legal and other operational needs.

Notice for Our California Workforce with Disabilities:

We are committed to providing our workforce access to this Privacy Notice and to ensure it meets CCPA specific disability requirements (such as standard screen readers). If you need further assistance, please contact us via email at HR@zenith-american.com

Changes to our Privacy Notice

We reserve the right and discretion to amend this Privacy Notice at any time. If changes to this Privacy Notice are made, we will post the updated notice on the Website with the updated effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact us:

If you have any questions about this Privacy Notice the Collection and Processing of your Personal Information or about the security of your Personal Information, please visit our website at [ZAS Privacy Policy](#) or contact Human Resources at HR@Zenith-American.com