

# Notice At Collection For Employees Residing in California

Sonoma Reinforcing Inc. (SRI), (the "Company") is providing you with this Notice At Collection For California Employees ("Notice") to inform you about:

- 1. the categories of Personal Information that the Company collects about employees who reside in California; and
- 2. the purposes for which the Company uses that Personal Information.

For purposes of this Notice,

"Personal Information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person that the Company collects about its employees, who reside in California, in their capacity as the Company's employees.

# **Assistance For Disabled Employees**

Alternative formats of this Notice are available to individuals with a disability. Please contact jennifer@sonomareinforcing.com for assistance.

## 1. <u>Identifiers And Professional Or Employment-Related Information</u>

1.1 **Personal Information Collected:** The Company collects identifiers and professional or employment-related information, including the following:

**Identifiers:** real name, nickname or alias, postal address, telephone number, e-mail address, Social Security number, signature, , bank account name and number for direct deposits, driver's license number or state identification card number and passport number.

**Professional or Employment-Related Information:** compensation, bonuses, pensions, benefits, attendance, evaluations, performance reviews, discipline, personnel files, expenses, education, corporate credit card details, membership in professional organizations, professional certifications, work eligibility in order to comply with legal requirements, and current and past employment history.

#### 1.2 Purpose of Use:

#### **Managing Personnel:**

- To manage personnel and employment matters
- To set up a personnel file
- To administer compensation, bonuses, other forms of compensation, and benefits (as permitted by law)
- To manage vacation, sick leave, and other leaves of absence
- To provide training
- To evaluate job performance and consider employees for other internal positions
- To develop a talent pool and plan for succession
- Career development activities
- For diversity and inclusion programs
- To conduct employee surveys
- To engage in crisis management
- To fulfill recordkeeping and reporting responsibilities

- To maintain an internal employee directory and for purposes of identification
- To facilitate communication, interaction and collaboration among employees
- To arrange team-building and other morale-related activities
- To manage employee-related emergencies, including health emergencies
- To promote the Company as a place to work
- To arrange and manage Companysponsored events and public service activities
- Workforce reporting and data analytics/trend analysis
- To design employee retention programs

# Monitoring, Security, And Compliance:

- To monitor use of Company information systems and other electronic resources
- To conduct internal audits
- To conduct internal investigations
- To protect the safety and security of the Company's facilities
- To report suspected criminal conduct to law enforcement and cooperate in investigations

#### **Conducting Our Business:**

- For communications with prospective, current, and former customers
- To make business travel arrangements
- To engage in project management
- To manage business expenses and reimbursements
- To promote the business
- To provide a directory and contact information for prospective and current customers and business partners

## 2. Personal Information Categories From Cal. Civ. Code § 1798.80(e)

The Company collects categories of Personal Information listed in Cal. Civ. Code §1798.80(e) (other than those already listed in "Identifiers," above) as follows for the purposes listed below:

- <u>Photograph and physical description</u>: (a) for security and internal identification purposes, and (b) to identify employees to co-workers, prospective and current customers, and other third parties;
- Medical information: (a) to the extent necessary to comply with the Company's legal obligations, such as to accommodate disabilities; (b) to conduct an analysis in accordance with the Americans with Disabilities Act and state law; (c) for workers' compensation purposes; (d) for occupational health surveillance; (e) for occupational health and safety compliance and record-keeping; (f) to conduct fitness-for-duty examinations; (g) to administer leaves of absence and sick time; and (h) to respond to an employee's medical emergency.
- Benefits information: to administer short- and long-term disability benefits. Characteristics
  of Protected Classifications Under California Or Federal Law

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, the federal Office of Contracting Compliance Programs (applicable to government contractors), and California's Fair Employment and Housing Act. The Company also collects information about disability status to the extent an employee may need special assistance during emergencies from the Company or from first responders.

The Company also collects the following characteristics (in addition to those listed above) for its diversity and inclusion programs (including analytics): (a) sex, (b) gender, (c) sexual orientation, (d) disability, (e) gender identity, (f) gender expression, (g) marital status, (h) age, or (i) familial status.

The Company also uses this Personal Information for purposes including: with respect to disability, medical condition, familial status, marital status, and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary to comply with Federal and California law related to leaves of absence and accommodation; with respect to military and veteran status, as necessary to comply with leave requirements under applicable law and for tax purposes; with respect to age, incidentally to the use of birth date for birthday celebrations and identity verification; with respect to religion and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary for accommodations under applicable law; with respect to protected classifications, such as national origin, to the extent this information is contained in documents that you provide in I-9 documentation; and with respect to marital status and familial status, for Company events and as necessary to provide benefits and for tax purposes.

The Company collects this category 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.

## 3. Internet Or Other Similar Network Activity

- 3.1 **Personal Information Collected:** The Company collects information about employees' use of the Internet or other similar network activity, including the following: browsing history, search history, log in/out and activity on the Company's electronic resources, and information regarding an employee's interaction with an Internet web site, application, or advertisement, and publicly available social media activity.
- 3.2 **Purposes of Use:** to monitor use of the Company's information systems and other electronic resources or information systems, to conduct internal audits, to conduct internal investigations, to protect the safety and security of the Company's facilities, and to impose discipline.

#### 4. Geolocation Data

- 4.1 **Personal Information Collected:** The Company collects geolocation data, including the following: (a) information that can be used to determine a mobile device's physical location and (b) information that can be used to determine a vehicle's physical location.
- 4.2 **Purposes of Use:** to assist with routing, to confirm that an employee has arrived and left an off-site work location when scheduled, for customer service purposes, to provide training, to manage employee-related emergencies, to monitor the safety of an employee, to monitor compliance with Company policies, and to determine whether to discipline employees.

## 5. Sensory Or Surveillance Data

- 5.1 **Personal Information Collected:** The Company collects sensory or surveillance data including footage from video surveillance cameras.
- 5.2 **Purposes of Use:** to protect the safety and security of the Company's facilities and personnel through video surveillance, to monitor compliance with Company policies, to provide training, for quality assurance, and to determine whether to discipline employees.

#### 6. <u>Background Screening Information</u>

- 6.1 **Personal Information Collected:** The Company collects background screening information, including results of the following types of background screening: motor vehicle records; employment history; drug testing; and educational history.
- 6.2 **Purposes of Use:** to screen employees for risks to the Company and continued suitability for their jobs and to evaluate employees for internal promotions.

# Purposes Potentially Applicable To Any Of The Categories Of Personal Information Listed Above

The Company also may use employees' Personal Information to facilitate administrative functions and information technology operations and for legal reasons and corporate transactions. These functions include, but are not limited to the following:

- 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;
- and to manage licenses, permits and authorizations applicable to the Company's business operations.

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