



January 1, 2020

California Consumer Privacy Act Employee Disclosure

Dear Job Applicant,

Respecting the privacy of our job applicants 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 recruitment 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 California Consumer Privacy Act. 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.

We collect, receive, maintain and/or share Personal Information with our service provider, ADP. The categories and the purposes described below for use of personal information reflects data processed across ADP's products.

	Categories of Personal Information Collected	Purpose
Category A.	Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers	1, 9, 10
Category B.	Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history financial information, medical information and health information ¹	1, 2, 9, 10, 15
Category C.	Characteristics of protected classifications under California or federal law, ² such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and marital status	1, 9, 10
Category D.	Commercial information, such as transaction information, purchase history and financial details	N/A
Category E. ^{3*}	Biometric information, such as facial recognition and fingerprints	N/A
Category F. ^{3,4}	Internet or network activity information, such as browsing history and interactions with ADP's website, applications or systems	10
Category G. ^{3,4}	Geolocation data, such as device location	9, 17

¹ This includes 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.

² This include sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), age (40 and over), race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave.

³ Only applicable where employer has selected to receive time keeping services from ADP.

⁴ Only applicable where employer has selected to receive screening and selection services from ADP.

Category H. ⁴	Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with ADP's business activities;	9
Category I.	Professional or employment-related information, such as work history and prior employer, human resources data and data necessary for benefits and related administrative services	9, 10, 15
Category J. ⁴	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records	9, 10
Category K.	Inferences drawn from any of the Personal Information listed above to create a profile or summary above, for example, an individual's preferences, abilities, aptitudes and characteristics	9, 10

Personal Information is collected for the following purposes:

1. To comply with state and federal law and regulations;
2. To process payroll;
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 obtain and verify background checks;
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 perform call monitoring and surveillance (e.g., CCTV); and
17. To provide, validate, or communicate services offered by ADP directly to individuals.

If you have any questions about the collection and processing of your Personal Information or about the security of your Personal Information, please visit RetailData's website or contact the Human Resources Team at HRHelp@retaildatallc.com.