



## California Employee Privacy Notice and Policy

Effective Date: January 1, 2023

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### **I. Notice and Policy Statement**

PERI Formwork Systems, Inc., and its affiliates (“us,” “our,” or “we”) provide this California Employee Privacy Notice and Policy (“California Notice”) to supplement the information contained in the [Applicant and Candidate Privacy Notice](#) (“Applicant Privacy Notice”) and [PERI Privacy Policy](#) (“Privacy Policy”), and to provide additional privacy notice to California employees and non-employees for whom we collect covered information under California Privacy Rights Act (“CPRA”), including third-party temporary workers, independent contractors and other workers, and emergency contacts or beneficiaries of PERI employees. This document serves as both our required Notice and Policy under CPRA. This California Notice provides the notice required by the California Consumer Privacy Act, as amended by the CPRA, and any regulations promulgated thereunder (hereinafter collectively, the “CPRA”). In the event of a conflict between the Applicant and Candidate Privacy Notices or the Privacy Policy and this California Notice, this Notice will prevail as to job applicants, employees, third-party temporary workers, and independent contractors that are residents of the state of California (“You”, “Your”).

The information contained in this California Notice pertains to Employment Data only. “Employment Data” is defined broadly to include information regarding non-employees, such as third-party temporary workers, independent contractors, and other workers. Receipt of this notice does not constitute an admission or representation that you are an employee of PERI. In addition, we may collect, store, share and use information that you provide to us outside of the employment



relationship. Please see our Privacy Policy, available on UKG under Company Info or on TEAMS under Policies for more information on our general information collection and use practices.

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## II. Purpose

This Notice is intended to apply only to Employment Data and does not replace or supersede any other information contained in other PERI policies.

This California Notice does not cover your use of PERI Formwork Systems, Inc.'s products or services as a consumer (for more information, please read our website Privacy Policy at <https://www.peri-usa.com/privacy-policy.html>, or to any third-party websites and apps that you may use, including those to which we link in our websites. Similarly, this California Notice does not cover any future employment with us, as the collection, use, retention, and other processing of your personal information may change upon hire and during the course of your employment.

We recommend that you read this California Notice in full to ensure you are fully informed about the manner in which we collect, use, store, or otherwise process your personal information as well as your privacy rights. However, if you want to skip to a particular section of this California Notice, please refer to the table of contents below.

1. [Sources of Personal Information and Data](#)
2. [Collection of Personal Information](#)
3. [Use of Personal Information](#)
4. [Personal Information Selling and Sharing](#)
5. [Retention of Personal Information](#)
6. [Your Privacy Rights](#)
7. [How We Protect Your Personal Information](#)
8. [Changes to This Policy Notice](#)
9. [How to Contact Us](#)

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## III. Scope

California employees, contractors, and individuals identified by Californian employees as a dependent and beneficiary.

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## IV. Definitions

- Personal Information - As used in this California Notice, "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 California resident or household.

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## V. Sources of Personal Information and Data

We may collect Personal Information from You and from Our third-party providers who support the purposes indicated below.

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## VI. Collection of Personal Information

Subject to applicable law, as has been the case over the last twelve (12) months, we collect some or all the following categories of personal information from you upon hire, during the course of your employment/work with us, or as an emergency contact or beneficiary of a PERI Employee:

Categories of Personal Information That May Be Collected	Persons Covered in Collection Category	Representative Data Elements	Categories of Third Parties to Whom We May Disclose Personal Information for Operational Business Purposes
Identifiers.	<ul style="list-style-type: none"> <li>• PERI Employees</li> <li>• Non-employee workers (including independent contractors and third-party temporary workers)</li> <li>• PERI Employees identified Emergency Contacts, Dependents, and Beneficiaries (<i>could include copy of passport and/or visa</i>)</li> </ul>	A real name, alias, postal address, unique personal identifier or online identifier, IP address, email address, account name, Social Security number, driver's license number, passport number, immigration documentation, or other similar identifiers.	Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, healthcare related services, communications, facilities and emergencies, business operations, and compliance; Other third parties as required by law including law enforcement and government agencies.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<ul style="list-style-type: none"> <li>• PERI Employees</li> <li>• Non-employee workers (including independent contractors and third-party temporary workers)</li> <li>• PERI Employees identified Emergency Contacts, Dependents, and Beneficiaries</li> </ul>	A signature, physical characteristics or description, address, state identification card number, insurance policy number, education, employment, employment history, bank account number, company issued credit card number, debit card number, any other financial information, or medical information.	Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, healthcare related services, company insurance, and compliance; Other third parties as required by law including law enforcement and government agencies.

<p>Protected classification characteristics under California or federal law.</p>	<ul style="list-style-type: none"> <li>• PERI Employees</li> <li>• PERI Employees identified Emergency Contacts, Dependents, and Beneficiaries</li> </ul>	<p>Age (40 years or older), race, color, national origin, citizenship, religion or philosophical beliefs, marital status, disability, health, sex life, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, and veteran or military status.</p>	<p>Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, company insurance, healthcare related services, and emergencies, and compliance; Other third parties as required by law including law enforcement and government agencies.</p>
<p>Internet or other similar network activity.</p> <p><i>Per PERI Policy, use is restricted to non-personal, business purposes only, except permissible personal use that is limited, occasional and incidental. (See the <a href="#">Acceptable Use of Technology Policy</a> )</i></p>	<ul style="list-style-type: none"> <li>• PERI Employees</li> <li>• Non-employee workers (including independent contractors and third-party temporary workers)</li> </ul>	<p>Browsing history, search history, information required to access company owned IT assets and systems such User ID, Network ID, and system passwords. Electronic content produced using company systems including company-owned and business-related e-mail messages sent and received and attachments thereto.</p>	<p>Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, business operations, and compliance; Other third parties as required by law including law enforcement and government agencies.</p>
<p>Geolocation data.</p>	<ul style="list-style-type: none"> <li>• PERI Employees</li> </ul>	<p>General or precise geolocation data, when enabled, via UKG time management application on corporate or personal devices.</p>	<p>Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, and compliance; Other third parties as required by law including law</p>

			enforcement and government agencies.
Sensory data.	<ul style="list-style-type: none"> <li>• PERI Employees</li> <li>• Non-employee workers (including independent contractors and third-party temporary workers)</li> <li>• PERI International Employees' Dependents (<i>Only to extent copy of passport and/or visa with photograph is collected</i>)</li> </ul>	Audio, video images, photographs, CCTV recordings, voicemail records, conference call audio and video recordings or similar information.	Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, communications, company insurance, business operations, and compliance; Other third parties as required by law including law enforcement and government agencies.
Professional or employment-related information.	<ul style="list-style-type: none"> <li>• PERI Employees</li> <li>• Non-employee workers (including independent contractors and third-party temporary workers) – <i>But only prior job history.</i></li> </ul>	Current or past job history, Performance evaluation, Compensation history, Certifications, Licenses, Education, time and payroll/payment records, consultant agreement, and employment or independent contractor agreements.	Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, business operations, and compliance; Other third parties as required by law including law enforcement and government agencies.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	<ul style="list-style-type: none"> <li>• PERI Employees</li> </ul>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, student schedules, or student financial information.	Our businesses and affiliated companies; Service providers including those providing support for managing work activities and personnel, business operations, and compliance; Other third parties as required by law including law enforcement and government agencies.
Inferences drawn from other	<ul style="list-style-type: none"> <li>• PERI Employees</li> </ul>	Reflecting characteristics, psychological trends,	Our businesses and affiliated companies; Service providers including those

personal information to create individual profiles.		predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	providing support for managing work activities and personnel; Other third parties as required by law including law enforcement and government agencies.
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**VII. Personal Information Selling or Sharing**

PERI does not Sell or Share your personal information as those terms are defined under California Consumer Privacy Act and has not done so in the last twelve (12) months.

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**VIII. Sensitive Personal Information**

Sensitive personal information is a subtype of personal information consisting of specific information categories. While we collect information that falls within the sensitive personal information categories listed in the table below, the CPRA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a consumer.

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**IX. Use of Personal Information**

In general, and subject to applicable law, we may use your personal information for operational purposes to:

- Recruit Employees, including to conduct employment related background screening and checks.
- To Administer Benefits, such as medical, dental, vision, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance and accident management and information associated with voluntary wellness program participation.
- To Pay and Reimburse for Expenses, including salary administration, payroll management, payment of expenses, to administer other compensation related payments, including assigning amounts of bonus payments to individuals, and administration of the variable pay plans.
- To Conduct Performance-Related Reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring.
- To Monitor Work-Related Licenses and Credentials, including provisioning software licenses for use in the course of an employee’s work-related responsibilities, ensuring compliance, training, examination, and other requirements are met with applicable regulatory bodies.
- To Provide Our Employees with Human Resources Management Services, including providing employee data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of employee claims, and travel administration and insurance.
- To Administer International Assignments, including relocation services, documenting assignment terms and conditions, obtaining relevant immigration documents, initiating vendor services, and fulfilling home/host country tax administration and filing obligations.
- To Maintain Your Contact Information, including altering your details across relevant entities within the PERI group of companies (for example personal, other employment and transferring roles).
- To Assist You in Case of Emergency, including maintenance of contact details for you, and your dependents in case of personal or business emergency.



- To Monitor Eligibility to Work in the U.S., which means monitoring and ensuring compliance of employees' ability to work in the U.S.
- To Conduct Healthcare-Related Services, including conducting employment-related medical screenings for return-to-work processes and medical case management needs; determining medical suitability for particular tasks; identifying health needs of employees to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on fitness for travel and fitness for expatriation.
- To Communicate with you on business topics, and to ensure business continuity and crisis management.
- To Protect the Health and Safety of our employees and others.
- To Maintain Records relating to business activities, budgeting, financial management, reporting, audits, and communications.
- To Manage Product and Service development, public relations, and award programs.
- To Improve Products and Services, manage company assets, allocate company assets and human resources, strategic planning, project management, business continuity, and compilation of audit trails and other reporting tools.
- To Facilitate Better Working Environment, which includes conducting staff surveys, providing senior management information about other employees, and conducting training.
- To Maintain Security on PERI Websites and Internet Connected Assets, which includes hosting and maintenance of computer systems and infrastructure; management of PERI's software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and Internet access.
- Comply with Applicable Law or Regulatory Requirements, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic and Health, Safety, Security and Environmental reporting.
- Other Uses. We may combine the information we collect ("aggregate") or remove pieces of information ("de-identify") to limit or prevent identification of any particular individual to help with strategy planning and Human Resource initiatives. Once such information has been aggregated and anonymized such that it is no longer considered personal information under applicable data protection law, this Notice does not apply.

If you have questions about or need further information concerning the lawful bases on which we collect, use, store, or otherwise process your personal information, please contact the Sr. VP of HR or your HR Generalist or email [privacy@peri-usa.com](mailto:privacy@peri-usa.com).

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#### **X. Retention of Personal Information**

We keep your personal information for no longer than necessary to fulfill the purposes for which it is processed and to comply with applicable law related to your employment with us. The length of time for which we retain personal information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws as set out in our records retention policy and/or data handling standard. Most employment, applicant and independent contractor records and personal information contained therein must be retained for four (4) years from date of application, work, or termination, whichever is later and applicable. Generally, this means we retain your personal information to comply with any retention or statutory limitations. Where there are technical limitations that prevent deletion or anonymization, we safeguard personal information and limit active use of it.

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## XI. Your Privacy Rights

You have certain rights under the California Consumer Privacy Act subject to applicable exceptions or limitations. If You make a privacy request, we will maintain a record of your request and our response to it. To exercise any of these rights, please contact reach out to the Sr. VP of HR.

- **Correction.** You have a right to **correct** personal information about you that is inaccurate, incomplete, or outdated, subject to certain exceptions. We may request documentation to determine the accuracy of the requested correction or update.
- **Access/Copy of Personal Information.** You may ask us to confirm whether we are processing Personal Information about You and request a copy of the specific pieces of Personal Information, subject to certain exceptions.
- **Deletion.** In certain situations, you can ask that we **erase** your personal information, **object** to, or **restrict** the use of your Personal Information, or **export** your personal information to another controller, subject to certain exceptions. In some circumstances, in response to a deletion request we may choose to anonymize, aggregate, or deidentify your personal information so that it cannot be linked to or used to identify you.
- **To Know.** You may request that we disclose to you the following information:
  - The categories of Personal Information we have collected about you.
  - The categories of sources from which your Personal Information was collected.
  - The business or commercial purpose for which we collected your Personal Information.
  - The categories of third parties to whom we have disclosed Personal Information.
  - The categories of Personal Information that we have disclosed for a business or commercial purpose and for each category identified, the categories of third parties with whom we have disclosed that category of Personal Information.
- **Opt-out of Profiling.** PERI does not use automated technology to profile individuals in furtherance of decisions that have a legal or similarly significant effect on you.
- **Limited the Use or Disclosure of Sensitive Personal Information.** The CPRA provides individuals the right to limit the use or disclosure of Sensitive Personal Information for the purpose of inferring characteristics about an individual. PERI does not collect, use, or disclose Sensitive Personal Information for such purposes.
- **Right Not to Be Subject to Discrimination.** You have the right to be free from unlawful discriminatory treatment for exercising your rights under the CPRA.

If you make a request to exercise the rights referenced above, we will require you to provide certain information for identity verification purposes. You may authorize an agent to make a request to us on your behalf and we will verify the identity of your agent or authorized legal representative by either seeking confirmation from you or documents that establish the agent's authorization to act on your behalf.

If you wish to exercise these rights, please contact the Sr. VP of HR or your HR Generalist or via email [privacy@peri-usa.com](mailto:privacy@peri-usa.com) or toll free at 888-575-9650.

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## XII. How We Protect Your Personal Information

We have implemented appropriate technical, physical, and organizational measures to protect your personal information from misuse or accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, acquisition, or access as well as all other forms of unlawful processing. To





achieve this, we have developed and implemented an Information Security Management System and other sub-policies and guidelines relating to the protection of your personal information. For example, our staff is permitted to access job applicant and/or candidate personal information only to the extent necessary to fulfill the applicable business purpose(s) and to perform their job, subject to confidentiality obligations.

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**XIII. Changes to This Notice**

Current employees will be advised of changes to our practices associated with Employment Data, by email, policy posting on HR information boards, and on UKG, and Teams. If you have provided personal information for a third party, such as an emergency contact or beneficiary for some employee benefit, you will be asked to confirm that you have provided them with a copy of this notice and any subsequent amendments. Persons who are not current employees may also access a current version of this Notice from <https://www.peri-usa.com/company/career.html>. Please note that you may be required to contact our third-party benefits providers in connection with certain employee benefits offered by PERI and related privacy notices.

It is important that the personal information provided by you in connection with your Employment Data is accurate and current. Please keep us informed if your personal information changes.

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**XIV. How to Contact Us**

For questions about this Notice, please contact the Sr. VP of HR or your HR Generalist or via email [privacy@peri-usa.com](mailto:privacy@peri-usa.com) or toll free at 888-575-9650.