Aldridge Electric, Inc California Privacy Rights Act ("CPRA") (Cal. Civ. Code §1798)

Supplemental Privacy Policy (2023)



The foregoing, Supplemental Privacy Policy, applies to "Consumers" as defined by the California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA") and serves as an additional privacy policy to Aldridge Electric's other privacy policies or notices, and applies solely to consumers, employees, visitors, users, and others who reside in the State of California ("Consumers" or "you").

The ("CPRA") is a legal requirement introduced by the state of California that requires applicable Businesses to make CA resident employee Personal Information, herein after referred to as ("Pl"), that may be collected by the Business, known and available to each employee, to the extent of the regulation. This Supplemental Privacy Policy represents Aldridge Electric's adherence to the applicable portions of the ("CPRA") and is meant to inform Aldridge Electric's California resident employees of their CPRA rights.

Personal Information ("PI") Aldridge Electric Collects:

The categories below set forth statutory categories of PI Aldridge Electric has collected from Employees within the last twelve (12) months:

- <u>Identifiers</u> Including: Name, physical or mailing address, social security number, driver's license number, email address, telephone number, or other similar unique personal identifiers.
- <u>Personal Information</u> Including: DOB, employment history, bank account number, education, health insurance information, or any other reasonably required PI required for conducting business.
- <u>Personal Characteristics</u> Including: A non-specific age, race, color, national origin, gender, religion, sexual orientation, or other similar protected classes of personal characteristics.
- <u>Geolocation Data</u> Including: Information identifying employees' physical location or movements.
- <u>Professional or Employment Information</u> Including: Current or previous employment, including employment evaluations.
- <u>Non-Publicly Available Educational Information</u> Including: Student education records maintained by an educational institution or party acting on its behalf.

Sources From Where ("PI") Information Is Collected and Why:

Sources

Aldridge Electric may retain PI from the categories listed above from the following general sources:

- Directly from employees, including documents that our employees provide for employment.
- Directly and indirectly from activities and processes reasonably associated with employment, including pre-employment.



Why and How We Use Your ("PI"):

Aldridge Electric may use or disclose the PI we collect for one or more of the following business purposes, in furtherance of our employer to employee relationship:

- To fulfill or meet legal or reasonable requirements for which the information is provided.
- To provide you with employment information, alerts, and other notices.
- To carry out Aldridge Electric required obligations associated with employment, including, payroll, and employee benefits with required third party service providers.
- As appropriate to protect the rights, property or safety of Aldridge, our clients, and employees.

Aldridge Electric does not sell or profit off employee PI. All PI information is monitored and controlled in accordance with acceptable security procedures and practices.

CCPA & CPRA Privacy Rights and Choices:

The CCPA grants employees' rights under the CPRA in the PI retained by their employer. Aldridge Electric is committed to honoring such rights in full compliance with all provisions of the CPRA. See below:

The Right to Know:

- I. Each CA employee has the right to know about the personal information that Aldridge Electric processes or issues to other parties, this includes:
 - a. The Right to Disclosure, which includes, the categories of information collected, the sources from which info is collected, the purpose for collecting, and the categories of personal information that Aldridge may have disclosed for a business purpose.

The Right to Delete:

- II. Each CA employee shall have the right to delete such personal information.
 - a. The Right to Delete PI is generally restricted to such information provided by such employee. It does not include personal information that Aldridge may create in connection with the employee during the course of employment.
 - b. Aldridge Electric may refuse a request to delete such information as necessary to comply with applicable laws and regulations, to continue providing reasonable employee services, and to ensure the safety of Aldridge, its clients, and employees.



The Right to Correct Inaccurate ("PI"):

III. Each CA employee has the right to request the correction of objectively false PI.

Exemptions:

- IV. Aldridge Electric recognizes the afforded rights under the CPRA regulations and notes certain CPRA exemptions under §1798.145. According to such exemptions, the CPRA shall not restrict Aldridge Electric from its ability to:
 - a. Comply with Federal, State, or local laws or comply with a court order or subpoena to provide information,
 - b. Comply with regulatory inquiry, investigations, or other authorities,
 - c. Retain such job applicant, or employee PI to the extent that the PI is collected and used by the business solely within the employees' role in the business. or
 - d. Retain PI collected for use as an emergency contact.

Changes and Authorized Requests:

Aldridge Electric reserves the right to change or update this policy, in adherence to any additional or updated regulations under the CCPA or CPRA.

Any PI that cannot be deleted, corrected, or inspected will be for the reason of adhering to applicable regulations, retention periods, for failing to adequately prove the identity of the employee requesting PI, or for any other applicable exemption. Aldridge Electric is committed to compliance and will not take adverse action against any employee who exercises such right in alignment with the regulation.

Contact:

For any questions, or to exercise such rights, employees can contact Aldridge Electric's Corporate Compliance Officer, Michael Geers by email mgeers@aldridgegroup.com or by phone (847) 680-5200.

