# Privacy Policy for California Residents

This Privacy Policy is intended to comply with the California Consumer Privacy Act (CCPA), and other applicable privacy laws. Consumers with disabilities may access this policy in an alternative format by sending an email to: <a href="mailto:humanresources@nepgroup.com">humanresources@nepgroup.com</a>. The Company does not and will not sell Personal Information.

For purposes of this California privacy policy, "Personal Information" means anything that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular California consumer or household.

## Notice of Categories of Personal Information We Collect and How We Use It

- Personal contact information such as name, address, telephone number and email address. We obtain this information from (1) you when you use our website and social media platforms or otherwise communicate with us; (2) publicly available databases; (3) joint marketing partners and event sponsors, when they share the information with us; and (4) referral sources. We use and share your personal contact information with trusted services providers to promote and provide our products and services to you and to communicate with you. We do not share this information with third parties who sell or use the information for their own purposes.
- Internet and other electronic network and app activity information such as browsing history, search history, IP address, and information regarding your interaction with an internet website, application or advertisement. We obtain this information from you and through the use of website or app cookies and web beacons. We use and share this information with trusted service providers to promote and provide our products and services to you and manage our relationship with you. We do not share this information with third parties who sell or use the information for their own purposes.
- Biometric information such as fingerprints, retinal scan, face and voice recognition. We obtain this information from you and through various technologies and use and share it with trusted service providers to verify your identify. We do not share this information with third parties who sell or use the information for their own purposes.
- Professional, employment-related, and educational information. We obtain this information from
  you, employment recruiters and referral sources when you apply for a job with us or become
  employed by us. We use and share this information with trusted service providers to manage our
  human resources activities. We also use and share this information with trusted service providers
  to perform credit background checks for purchases based on credit.
- Inferences drawn from any of the categories of Personal Information above to create a profile about you regarding your preferences, characteristics, psychological trends, predispositions, behavior attitudes, intelligence, abilities and aptitudes. We develop these inferences internally or obtain this information from trusted service providers who assist us with our business. We do not share this information with third parties who sell or use the information for their own purposes.

The Company does not and will not sell your Personal Information.

The link to the Company's Privacy Policy is here.

#### Right to Know About Personal Information Collected, Disclosed or Sold

You have the right to know about the Personal Information we collected disclosed and/or sold about you during the prior 12 months. Consumers with disabilities may access this policy in an alternative format by sending an email to: humanresources@nepgroup.com.

Specifically, you have a right to know:

- The specific pieces of personal information we have collected about you and your household, and
- The categories of personal information we have collected about you, and your household including the categories of sources from which your Personal Information was collected, business or commercial purposes for which your Personal Information was collected.

The categories of Personal Information that we collected, disclosed in the past 12 months are discussed above in the Notice of Personal Information We Collect and How We Use It.

We have not disclosed or sold any Personal Information to third parties for a business or commercial purpose in the past 12 months.

If you have an online account with us, you may request to review and obtain the Personal Information we collect or disclose by logging into your account. Otherwise, you can obtain the Personal Information we collect or disclose by submitting a verifiable written request to us via email at <a href="https://humanresources@nepgroup.com">humanresources@nepgroup.com</a> or by calling us at our toll-free telephone number: (1-800-444-0054) or by asking to speak with a member of the Human Resources Department at one of our physical locations. To ensure that the request is coming from you and to protect the security of your Personal Information, we require that you provide us with 2 data points to verify your identity if you are requesting access to the categories of Personal Information we collect: (1) email address (2) telephone number, If you are requesting to obtain specific pieces of Personal Information regarding your household, each member of your household must provide the verification information above in order for us to verify their identities.

If you use an authorized agent to exercise your right to know about your Personal Information, we will verify the identity or your authorized agent by requiring your authorized agent to provide us with either (1) your power of attorney authorizing the authorized agent to act on your behalf or (2) your written authorization permitting the authorized agent to request access to your Personal Information on your behalf together with the identity verification information for you described above depending upon whether the authorized agent is requesting the categories of Personal Information about you or specific pieces of Personal Information about you.

Within 10 days of receiving your request to know, we will confirm receipt of your request and provide information about how we will process your request, including a description of our process to verify your identity and when you should expect our response. Generally, we will respond to your request within 45 days and provide you the requested Personal Information by mail or a readily usable electronic format. Under certain circumstances, we may take up to 90 days to respond to your request. In these circumstances, we will provide you with notice and an explanation of the reason we will take more than 45 days to respond to your request.

If you are requesting to obtain specific pieces of your Personal Information and we\_are unable to verify your identity, we will deny your request and inform you that we cannot verify your identify and explain why we have no reasonable method with which we can identify you. However, we will treat your request as a request to obtain the categories of Personal Information we collect, or disclose described below.

If you are requesting to obtain the categories of Personal Information we collect, or disclose and we are unable to verify your identity, we will deny your request, inform you that we cannot verify your identify, and direct you to our Privacy Policy which describes our general business practices regarding the collection, and maintenance of Personal Information. We will also explain why we have no reasonable method with which we can identify you.

By law, we can deny your request to know specific pieces of your Personal Information, in whole or in part, if it conflicts with federal or state law. If we deny your request for these reasons, we will notify you

that your request has been denied and explain the reasons for the denial. If your request in denied only in part, we will disclose the reminder of the Personal Information you requested.

By law, we cannot provide you with specific pieces of your Personal Information if the disclosure creates a substantial, articulable, and unreasonable risk to the security of your Personal Information. Additionally, we are prohibited by law from disclosing to you your Social Security number, driver's license number or other government-issued identification number, financial account information, any health insurance or medical identification number, an account password, or security questions and answers.

### Notice of Your Right to Request Deletion of Your Personal Information

You have the right to request us to delete the Personal Information that we have collected or maintained about you and your household. If you have an online account with us, you may request to delete the Personal Information we collect, or disclose by submitting a verifiable written request to us by <u>calling us at our toll-free telephone number: (1-800-444-0054)</u> or by asking to speak with a member of our Human Resources Department at one of our physical locations. To ensure that the request is coming from you and to protect the security of your Personal Information, we require that you provide us with 2 data points to verify your identity if you are requesting access to the categories of Personal Information we collect: (1) email address (2) telephone number.

If you use an authorized agent to exercise your right to delete your Personal Information, we will verify the identity or your authorized agent by requiring your authorized agent to provide us with either (1) your power of attorney authorizing the authorized agent to act on your behalf or (2) your written authorization permitting the authorized agent to request access to your Personal Information on your behalf together with the identity verification information for you described above depending upon whether the authorized agent is requesting the categories of Personal Information about you or specific pieces of Personal Information about you.

Within 10 days of receiving your request to delete, we will confirm receipt of your request and provide information about how we will process your request, including a description of our process to verify your identity and when you should expect our response. Generally, we will respond to your request within 45 days. Under certain circumstances, we may take up to 90 days to respond to your request. In these circumstances, we will provide you with notice and an explanation of the reason we will take more than 45 days to respond to your request.

If we are able to verify your identity, we will delete your Personal Information by one of the following deletion methods and will notify you of the deletion method used:

- Permanently and completely erasing the Personal Information on our existing systems except our archived or back-up systems;
- De-identifying the Personal Information; or
- Aggregating the Personal Information.

We may offer you the option to delete a select portion of the Personal Information you requested to be deleted in addition to the option to delete all of the Personal Information you requested to be deleted.

Prior to deleting your Personal Information, we will send you an email or call you to confirm that you want your Personal Information deleted.

If your Personal Information is stored on or archived or back-up systems, we will delete the Personal Information as described above when our archived or back-up system in next accessed or used.

We will also direct our service providers to whom we have provided your Personal Information to delete your Personal Information.

If we are unable to verify your identity, we will deny your request and inform you that we cannot verify your identify.

By law, we may also deny your request to delete if retention of your Personal Information is necessary to:

- Detect security incidents, protect against malicious, deceptive, or illegal activity or prosecute those responsible for this activity;
- Debug to identify and repair errors that impair existing intended functionality of our systems;
- Exercise free speech rights;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest;
- Enable solely internal uses that are reasonably aligned with your expectations;
- Comply with a legal obligation; or
- Otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information.

If we deny your request to delete, we will:

- Inform you that we have denied your request and describe the basis for the denial including any legal exception permitting denial;
- Delete any Personal Information that is not subject to the legal exception above; and
- Refrain from using the Personal Information retained for any other purpose than provided for by that exception.

In responding to your request to delete, we will maintain a record of your request for the legally required period of 24 months.

### Privacy Policy Regarding Children

We do not collect, use or sell Personal Information of children age 16 or under.

#### Right to Nondiscrimination

You have the right to receive our products and services on equal terms regardless of whether or not you exercise your rights under the CCPA.

If you have questions or concerns regarding this Privacy Policy, please contact us at:

humanresources@nepgroup.com

1-800-444-0054