

**P.W. GILLIBRAND CO., INC.,
AND ITS WHOLLY-OWNED SUBSIDIARIES
PRIVACY POLICY**
Updated 02/20/2024.

INTRODUCTION

P.W. Gillibrand Co., Inc. and its wholly-owned subsidiaries (“We,” or “PWG”) are committed to protecting your privacy and safeguarding your personal information. This Privacy Policy explains how we collect, use, and disclose information about you when you use our services, including our website, phone calls, e-mails, text messages, and other communication channels. By accessing or using our Services, you agree to this privacy policy. We may change this policy occasionally, and any changes will be noted in the section titled ‘Changes To This Privacy Policy.’ Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check this policy periodically for updates.

INFORMATION WE COLLECT

We collect information about you directly from you and automatically through your use of our website, e-mail, text messages, and other electronic messages between you and our employees, surveys, and social media sites. We may also receive information from third parties, such as consumer reporting agencies, employers, and others. We may combine the information we collect from you with information we receive from third parties.

The types of information we collect include:

- **Identifiers**, including individual’s name, home address, business address, job title, e-mail address, telephone number, social security number, driver’s license number, or passport number.
- **Personal information categories described in the California Customer Records statute**, including individual’s signature, education, employment history, bank account or any other financial information, medical information, or health insurance information.
- **Characteristics of protected classifications under California or Federal law**, such as race, national origin, gender, age, medical conditions, citizenship, disability, military or veteran status, request for family and medical care leave, and request for pregnancy disability leave.
- **Internet or other similar network activity**, including your I.P. address, browser type, search history, or operating system.
- **Geolocation data**, such as the location of company-issued laptops, mobile phones, and device location.
- **Professional or employment-related information**, such as work history, prior

employer, human resources data, and data necessary for administering benefits and related administrative services. You are not required to submit all of this information in order to submit a job application.

- **Non-publicly available educational information** as defined under the Family Educational Rights and Privacy Act (FERPA) and related regulations, such as a grade point average and school transcript.
- **Inferences drawn from other personal information** to create profiles reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
- **Certain sensitive information**, such as government identifiers (Social Security Number, driver's license, passport, or state identification card), account access credentials (usernames combined with required access/security code or password), racial or ethnic origin, mail/e-mail/text message contents, and health information.
- **Business Information**, such as data, insights, risk management, your name and job title, products, and services you purchase from us.

HOW WE USE YOUR INFORMATION

We use the information we collect to:

- Provide, maintain, and improve our website and services to our workforce and customers.
- Provide us with information, products, or services you request.
- Provide you with notices about your account, including order confirmations, shipping, invoices, tickets, processing payments, account statements, etc.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- Communicate with you, including responding to your comments, questions, and requests.
- Send you technical notices, updates, security alerts, and support and administrative messages.
- Monitor and analyze trends, usage, and activities in connection with our website and services.
- Conduct hiring.
- Manage our employee workforce.
- Manage any payments, benefits, and/or compensation obligations and transactions.
- Meet our obligations as an employer under your employment contract or other applicable employment laws.
- Manage employment relationships with individuals, including human resource-related matters.
- Educate, train, and develop our employees and workforce.

- Communicate or market PWG’s services or other products or services PWG offers or believes that individuals might be interested in, including relevant job and employment opportunities, including sending e-mails and other promotional communication about PWG and PWG’s services, including marketing, advertising, surveys, promotional, and thought leadership material.
- Comply with all applicable laws, rules, and regulations, including health and safety obligations.
- Respond to requests from individuals, including the exercise of any access rights.
- Manage, administer, and monitor our technology, application, and website usage, including monitoring our network and information security.
- Ensure that the content on our website is presented in the most efficient manner.
- Use for other permissible business purposes, such as data analysis and developing new products, services, and offerings.
- Carry out any other purpose for which the information was collected.

INFORMATION SHARING

We do not sell your personal information to third parties. However, we work with third-party providers who are contractually obligated to comply with our policies to protect information. These third-party providers may include but are not limited to, shipping and delivery companies, payment processors, customer service providers, consumer reporting agencies, background check providers, benefit providers, previous employers, and others of a similar nature. We share information with these providers only to the extent necessary to perform the services they provide to us. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy practices of that site or mobile app to understand the specifics of how your online personal information may be collected, used, and shared.

YOUR CHOICES

You may opt-out of receiving promotional e-mails from us by following the instructions in those e-mails. If you opt-out, we may still send you non-promotional e-mails, such as those about your account or our ongoing business relations.

We do not control the accuracy of information that third parties give us. You must contact those sources if you want to change the information we receive about you. If we have asked for a consumer report about you, and you write or call us, we will give you the consumer reporting agency’s name, address, and phone number. The agency will give you a copy of the report if you ask the agency and provide proper identification.

SECURITY

We take reasonable measures to help protect information about you from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. The safety and security of your information also depend on you. We can protect personal information through a combination of physical security, electronic security, and employee training.

Physical security measures include locking up paper documents and files containing sensitive information in a secure room or file cabinet, limiting access to employees with a legitimate business need, and controlling who has a key and the number of keys. Electronic security measures include using strong passwords, encrypting sensitive information, and using firewalls to restrict access to only those with permission. We also use industry-standard security technologies and procedures to safeguard your information. These technologies and procedures are regularly reviewed and updated to ensure they remain effective against the latest threats.

Finally, employee training is also crucial to ensure that employees know the importance of data security and are equipped with the necessary skills to identify and respond to security incidents. Unfortunately, the online transmission of information is not entirely secure. Although we do our best to protect your personal information, we cannot guarantee its security.

DATA RETENTION

Your personal information is stored with us as long as needed to conduct business with you, for the purposes outlined in this policy or at the time of collection, and to comply with legal obligations, resolve disputes, and enforce any agreements. We retain your information only for as long as necessary to fulfill the purposes for which it was collected, including any legal, accounting, or reporting requirements. When the applicable retention period has expired, we reserve the right to take measures to permanently delete the information, aggregate it, or anonymize it.

MINORS

We recognize the importance of protecting privacy where children are involved. Our website is not intended for minors, and we do not knowingly collect personal information from children under 16 years of age. If you are under 16, we request that you do not use or provide any information to us through our services.

CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy, and, in some cases, we may provide you with additional notice (such as adding a statement to our website or sending you a notification). We encourage you to review our Privacy Policy whenever you access our website or services to stay informed about our information practices and how you can help protect your privacy. This Privacy Policy is effective as of the date stated at the top of this page.

YOUR CALIFORNIA PRIVACY RIGHTS

California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA): The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and processing of their personal information.

Individuals' rights include the following:

- **Right to be Informed:** Individuals have the right to be informed of (a) the categories of personal information collected about them; (b) the categories of collection sources; (c) the business or commercial purposes for processing such personal information; and (d) the categories of third parties with whom we share such personal information. The rights mentioned above are outlined in this California Notice & Policy.
- **Right to Access:** Individuals have the right to request access to a copy of the personal information collected about them over the past 12 months.
- **Right to Delete:** In certain circumstances and subject to certain exceptions, individuals may have the right to request that their personal information be deleted.
- **Right to Opt-Out of Sales of Personal Data:** Individuals have the right to opt out of the sale of their personal information. Your Personal Information is never sold, rented, or leased to any external company unless you have granted us permission to do so.
- **Right to Limit Use of Sensitive Personal Information:** Individuals have the right to limit usage of Sensitive Personal Information to the extent necessary to perform the services reasonably expected by the consumer.
- **Right to Non-Discrimination:** PWG will not discriminate against individuals when they exercise their privacy rights under the CCPA and will not: (a) deny individual's goods or services; (b) charge you different prices or rates for goods or services; or (c) provide individuals with a different level of quality of good or services. However, due to the nature of the PWG's Services, failure to provide certain personal information may result in PWG being unable to provide such PWG Services without certain requisite personal information.

CONTACT US

For more information about our privacy policy, or if you wish to exercise your rights as required by law, please do not hesitate to contact us.

E-mail: HRDepartmentPrivacyGroup@pwgcoinc.com

Phone: 805.526.2195 and leave a message for Human Resources

Mail: P.W. Gillibrand Co., Inc.
4537 Ish Drive
Simi Valley, CA 93063
Attn: H.R. Department/Privacy Group

California consumers making a request must verify consumer's identity in order to proceed with any request. Any California consumer requesting to exercise their rights must provide one of the following: a scanned Driver's License or Government Identification.

PWG may take steps in compliance with applicable law to verify a requestor's identity. Subject to applicable law, PWG may limit or deny requests. PWG is only required to respond to verifiable consumer requests in which PWG can reasonably verify the request is made by the consumer about whom PWG has collected personal information.