



Holland Partner Group
CCPA Notice for Employees, Prospective Employees and Contractors

The California Consumer Privacy Act (“CCPA”) gives job applicants, employees and contractors that reside in California the right to know the categories of personal information that Holland Partner Group, and its affiliated entities, successors or assigns, including without limitation Holland Residential, LLC and Holland Construction, Inc. (collectively known as “Holland”), may collect from them and the purposes for which such information can be used. This notice supplements our Employee Handbook (which has or will be provided to you if you commence employment with us) and notifies you of our information-gathering and disseminating practices during your potential or actual employment or engagement with Holland (“Services”). References in this notice to “we,” “us,” or “our” mean Holland and references to “you” and “your” mean you, the actual or prospective employee or contractor. Nothing in this notice will create a contract for guaranteed or continued employment or term of engagement.

Information We Collect and Use. We may collect the following categories of personal information from you over the course of your Services:

- *Identifiers.* This includes without limitation your real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, telephone number, birthdate, account name, social security number, driver’s license number, passport number or other similar identifiers.
- *Categories of personal information described in Section 1798.80(e) of the California Customer Records Act.* This includes without limitation copies of your signature, physical characteristics or description, state identification card number, insurance policy number, education, employment, employment history, bank account number or any other financial information, medical information, health insurance information, and other information that identifies, relates to, describes, or is capable of being associated with you.
- *Characteristics of protected classifications under California or federal law.* This includes without limitation information will be used for our record keeping purposes and reporting requirements and to access and improve our employee policies, operations and outreach.
- *Biometric information.* You may need to provide us with information regarding your height, weight and clothing or shoe size to receive the proper uniform (if applicable) to be worn during your Services. We may keep a photo of you for our records and to provide you with a company ID badge.
- *Internet or other electronic network activity information.* This includes without limitation your browsing history, search history and information regarding your interaction with an internet website, application, advertisement or our Wi-fi, and all electronic files, messages, and other digital archives and electronic communications stored on our computers, laptops, tablets, phones, desktops, websites, emails and other equipment and software (collectively, “Technology Resources”).
- *Geolocation data.* This includes without limitation, information that can be used to identify your location or the physical location or use of our Technology Resources.
- *Audio, electronic, visual, thermal, olfactory or similar information.* This includes without limitation security video surveillance technology at our properties or workplaces, video recordings and photos of you at Holland sponsored events or promotional affairs, voice messages left on our voice mailbox(es), phone conversations recorded for quality control, training or customer service purposes, photo of you for Holland records and files, and your body temperature or other similar information in connection with the Holland’s illness prevention protocols.
- *Professional or employment-related information.* This includes without limitation your current or past job history, employee status and title, performance evaluations, clients you have worked or currently work with, work

schedule, job assignments, portfolio, hours worked, training and development information, disciplinary and counseling information, and termination information.

- Educational information. This includes without limitation your education level, degrees, honors, GPA, schools attended, indirect maiden name, and other information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act.
- Inferences drawn from your personal information. This includes without limitation your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, aptitudes, decisions, and actions as it relates to the Services.
- COVID-19 Screening Information – This includes without limitation, whether you have experienced any symptoms associated with Covid-19, whether you have tested positive for Covid-19, whether you have been in contact with someone who has been recently showing symptoms of Covid-19 or tested positive for Covid-19, your body temperature, your recent travel information, or whether you have received or plan to receive the COVID-19 vaccination
- Other categories of personal data that relates to or is reasonably capable of being associated with you. This includes without limitation the messages and other content you send us or our agents, staff, third party service providers, websites, social media networks or other interactive pages. We may also collect information about members of your household, emergency contact information, benefit selection and related information, health conditions, job restrictions, workplace accident and illness information, health insurance policy information, passwords if you choose to store them in the Holland's equipment or property, vehicle information (e.g., the model, year and license number), and other information that may be reasonably linked, directly or indirectly, with you or your household.

Purposes We Use Your Information. We may use all or some of the above categories of personal information to:

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Perform short-term, transient actions, provided that the personal information is not disclosed to a non-service provider third party and is not used to build a profile about you.
- Perform services on behalf of our business or service providers, including without limitation maintaining or servicing accounts, providing human resources services, processing or fulfilling requests and transactions, verifying employee information, processing payments, payroll, service fees and benefits, providing financing, paying taxes and expenses, providing advertising or marketing services, or providing analytic services.
- Analyze trends and usage and undertake internal research for technological development and demonstration.
- Undertake activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Holland, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the Holland.
- Conduct audits, credit checks, background checks, reference checks and employment verifications.
- Contact you when necessary regarding the Services, your obligations, work assignments, work schedules, office hours, Holland-sponsored events, information about Holland, its products or services, and other work-related notices.
- Share your information, as necessary, with our human resources service providers, payroll processors, benefits vendors, insurance providers, accountants, legal counsel and other third parties in connection to the general operations of Holland and our contractual and statutory obligations as your potential or actual employer.
- Comply with federal, state and local laws, satisfy our record keeping and reporting requirements, assess and improve our policies, operations and outreach, and ensure our policies are not violated.
- Customize and tailor your experience on our Technology Resources or identify the physical location of our Technology Resources and its users.
- Ensure the safety of our properties, residents, employees and contractors.
- Incorporate in our promotional, marketing and outreach material.

- Assess whether to offer you a job, promote you or expand your responsibilities as an employee or independent contractor of Holland, or in connection to performance reviews.
- Respond to a court, state or federal order, when we believe we must do so by law and/or whenever we deem it appropriate or necessary to inform law enforcement authorities and exercise our rights under applicable law.
- Share or transfer your information in connection with, or during negotiations of, any merger, sale of Holland assets, financing or acquisition of all or a portion of our business to another company.
- Implementing measures to reduce the spread of Covid-19 or other infectious diseases.
- Screening for Covid-19 and other highly infectious diseases to reduce the risk of spreading the disease in and through our properties or events, to protect our employees, contractors, residents and visitors from exposure to Covid-19, to permit contact tracing related to any potential exposure, and to communicate with employees, residents and visitors regarding potential exposure to Covid-19 so others may take precautionary measures and help prevent further spread of the virus, and obtain treatment, if necessary.

Retention and Privacy Policy Changes. Holland will retain your information for as long as is necessary for the purposes set out in this notice, or to operate its business and comply with our legal obligations, resolve disputes, enforce our agreements and our written policies, including without limitation our Employee Handbook. Holland may update this notice from time to time, and at Holland's sole discretion. When we make changes, we will revise the "Effective Date" of this notice and provide you with a copy.

Third-Party Service Providers

We may collect and share personal information about you from and with our third party service providers. For example, we use iCIMS software to process job applications and to run and operate our Employee/Intranet Portal and we use Paylocity to process paychecks. You acknowledge that your use of our third party service provider's software and websites are not governed by this notice. If you are asked to provide information on our third party service provider's websites, we encourage you to carefully review their privacy policy before sharing your information. For your convenience, below are links to some of the main websites that Holland uses for the data referenced in this notice:

- <https://www.icims.com/legal/privacy-notice-website/>
- <https://www.paylocity.com/privacy/>

For More Information.

If you have questions or concerns regarding this notice or use of your information, please contact us by email at dataprivacy@hollandpartnergroup.com or by calling our toll-free number 1-888-212-2157.