

Holland Partner Group Employee and Prospective Employee Privacy Policy



Effective January 1, 2020, the California Consumer Privacy Act (“CCPA”) gives job applicants and actual employees 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 how such information can be used. We adopted this Employee and Prospective Employee Privacy Policy (“Privacy Policy”) to comply with the CCPA, to supplement our Employee Handbook (which has or will be provided to you if you commence employment with us), and to notify you of our information-gathering and disseminating practices during your potential or actual employment with Holland (“Employment”). References in this Privacy Policy to “we,” “us,” or “our” mean Holland and references to “you” and “your” mean you, the actual or prospective employee. Nothing in this Privacy Policy will create a contract for guaranteed or continued employment.

Information We Collect and Use. When applying for Employment, onboarding as an employee, or during your performance of services relating to your Employment, we may collect the following information from you and use it for the purposes described in this Privacy Policy, our written policies, and as directed or consented by you:

- Identifiers including real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver’s license number, passport number or other similar identifiers (collectively, the “PII”). We use your PII for various recruitment and employment-related purposes, including without limitation to: conduct credit checks, background checks, reference checks and employment verifications; contact you when necessary regarding offers of employment, your obligations, services, projects, office hours, Holland-sponsored events and other work-related notices; send you information about Holland, its products or services and information you’ve requested; process your payroll, benefits, taxes and expenses; create work schedules; and 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 its contractual and statutory obligations as your potential or actual employer. You may be asked to provide additional PII, including without limitation, your citizenship information, household information (e.g., the names, birthdates, sex and age of your spouse, children and other beneficiaries), vehicle information (e.g., the model, year and license number), emergency contact information, medical information, benefit elections and your work schedule availability. If you provide us with personally identifying information of individuals other than yourself, you represent that you are authorized and received consent from such third party to provide us with such information and to use it as disclosed in this Privacy Policy and our written policies.
- Characteristics of protected classifications under California or federal law. This 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 Employment. 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, including but not limited to, browsing history, search history and information regarding your interaction with an internet website, application or advertisement. We may log the name of your Internet service provider, IP address, or use “cookie” technology to store your preferences, browsing history and record session information as you log into and use Holland employee productivity applications and software, electronic mail systems, voice mail systems, computer systems and cloud computing services, websites or when using Holland’s computers, tablets and other equipment (collectively, the “Technology Resources”). All messages sent and received, including personal messages, and all data and information stored on Technology Resources are Holland property regardless of the content. Holland may monitor and store internet, electronic files, messages, mail, other digital archives and the use of electronic communications as necessary to ensure that no misuse or violation of Holland policy or any law occurs. Employees should have NO expectation of privacy in using any Technology Resources, or any information or communications related to business matters stored on personal equipment. Employees who delete or erase information or messages should not assume that such information or messages are confidential. We may use your information collected through our Technology Resources to customize and tailor your experience on our Technology Resources and improve our employee policies, operations and outreach.

- Geolocation data. We may use cookies that automatically collect information that can be used to identify the physical location of an electronic device that uses our Technology Resources. We may use this information to, among other things, analyze trends and usage and to troubleshoot problems with our Technology Resources.
- Audio, electronic, visual, thermal, olfactory or similar information. As a security measure, and to ensure the safety of our properties, we may use video surveillance technology at our properties, and may subsequently record you during your shifts or when you are physically at one of Holland's properties. Additionally, if you are at a Holland-sponsored event where photos or video recordings are taken, we may use images or recordings of you at such events for our promotional and marketing purposes. During the course of business activity, Holland may record phone conversations for the purposes of quality control. Any voice recordings or messages that you voluntarily leave on Holland's voice mailboxes or message boards may also be collected.
- Professional or employment-related information and educational information that is not publicly available is considered personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA). We may use this information to assess whether to offer you Employment, promote your position or expand your responsibilities as an employee of Holland. We may also contact your former employers, organizations, schools or professional associations provided by you to verify the accuracy of such information.
- Inferences drawn from your personal information. We may take note or make a record of your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, aptitudes, decisions, and actions as it relates to your Employment to decide whether to offer you a job or promotion, to assign or expand your job responsibilities or to provide you with performance reviews.
- Other categories of personal data that relates to or is reasonably capable of being associated with you. We may collect the messages and other content you send us or our agents and staff directly (e.g. emails containing feedback and reviews of our employment procedures) or through our third party websites, social media or other interactive pages (e.g. Skype, Microsoft Teams, etc.).

We also collect information as we deem necessary to track/verify compliance with federal, state and local laws, and to use for our general Business Purposes and Commercial Purposes (as defined in Section 1798.140 of the CCPA). We may disclose your information in response to a court order, when we believe we must do so by law and/or whenever we deem it appropriate or necessary to inform law enforcement authorities. Additionally, we reserve the right to share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company. We will not provide you with notice before disclosure in such cases.

Retention and Privacy Policy Changes. Holland will retain your information for as long as is necessary for the purposes set out in this Privacy Policy, 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 change its Privacy Policy from time to time, and at Holland's sole discretion. When we make changes, we will revise the "Last Updated Date" of this Privacy Policy 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. Your use of our third party service provider's software and websites are not governed by this Privacy Policy. If you are asked to provide information on one of these 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 Privacy Policy:

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

For More Information.

If you have questions or concerns regarding this Privacy Policy 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.