

## **California Privacy Rights Act Notice**

**This policy is applicable to employees working in California only.**

P.C.S. COMPANY (PCS) complies with the California Consumer Privacy Act of 2018 (“CCPA”) and California Privacy Rights Act of 2020 (“CPRA”). We may collect the following categories of California Personal Information (CPI) from Employees: name and contact information (phone number(s); mailing address; email address(es)); signature; Social Security number; physical characteristics or description; passport number; driver’s license or state identification card number; insurance policy number(s); credit card number(s); debit card number(s); other financial information, medical information, or health insurance information; education and qualifications; employment history and experience; social media information; age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status; biometric information (including genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data); geolocation data (physical location or movements); current or past job history or performance evaluations; profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

PCS obtains the CPI listed above from the following categories of sources: directly or indirectly from the Employee; public records, internet databases, or other publicly available information; or from social platforms.

PCS may use or disclose the personal information collected for one or more of the following business purposes: to maintain proper employee records; to fulfill or meet the reason the Employee provided the information; to carry out PCS’s obligations and enforce its rights arising from any contracts entered into between the Employee and PCS; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; as described to the Employee when collecting your personal information or as otherwise set forth in the CPRA; as necessary or appropriate to protect the rights, property or safety of PCS, its clients or others.

PCS will not collect additional categories of personal information or use the personal information PCS collected for materially different, unrelated, or incompatible purposes without providing notice to the Employee.

### **Sharing Personal Information**

PCS may disclose Employee’s CPI to a trusted third party, but only to the extent necessary to perform necessary business purposes or provide services to PCS or to Employee. PCS expects these third parties to comply with the CPRA and maintain the privacy and security of the CPI they process on PCS’s behalf.

PCS discloses Employee personal information for business or personal purpose(s) to the following categories of third parties: PCS’s affiliates; service providers; third parties to whom Employee or Employee’s agents authorize PCS to disclose Employee’s personal information in connection with products or services provided to Employee.

## **Access to Specific Information and Data Portability Rights**

Employee has the right to request that PCS disclose certain information to Employee about PCS's collection and use of Employee CPI over the past 12 months. Once PCS receives and confirms your verifiable consumer request, PCS will disclose to you: the categories of CPI PCS collected about you; the categories of sources for the CPI PCS collected about you; PCS's business or purpose for collecting that CPI; the categories of third parties with whom PCS shares that CPI; the specific pieces of CPI PCS collected about you, if requested (also called a data portability request); if PCS disclosed your CPI to a third party for a business purpose, a list identifying the CPI categories that each category of recipient obtained.

## **Deletion Request Rights**

You have the right to request that PCS delete any of your CPI that PCS has collected and retained, subject to certain exceptions. Once PCS receives and confirms your Verifiable Consumer Request (as defined below), PCS will delete (and direct any service providers to delete) your CPI from its records, unless an exception applies.

PCS may deny your deletion request if retaining the CPI is necessary for PCS or the service providers to: maintain proper employment records; detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; comply with the California Electronic Communications Privacy Act; engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent; enable solely internal uses that are reasonably aligned with employee expectations based on your relationship with PCS; comply with a legal obligation; make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a request to PCS by sending an e-mail to [mswajanen@pcs-company.com](mailto:mswajanen@pcs-company.com) or calling 586-238-4065. Only you or a person registered with the California Secretary of State authorized to act on your behalf, may make a request related to your CPI. You may also make a request on behalf of your minor child. You may make no more than two requests for access or data portability within a 12-month period. The request must: provide sufficient information that allows us to reasonably verify you are the person about whom PCS collected personal information (or an authorized representative.); and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

## **Response Timing and Format**

PCS endeavors to respond to requests within 45 calendar days of their receipt. If PCS requires more time (up to 90 calendar days), PCS will inform you of the reason and extension period in writing.

PCS will deliver the written response by mail or electronically, at your option. Any disclosures provided by PCS will only cover the 12-month period preceding the request's receipt. The provided response will

also explain any reasons PCS cannot fully comply with the request, if applicable. For data portability requests, PCS will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

PCS does not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If PCS determines that the request warrants a fee, PCS will tell you why it made that decision and provide you with a cost estimate before completing your request.

### **Non-Discrimination**

PCS will not discriminate against you for exercising any of your CPRA rights to the extent protected by applicable law.