

# **JAMES RIVER GROUNDS MANAGEMENT CCPA PRIVACY POLICY FOR WORK-RELATED INDIVIDUALS WHO ARE RESIDENTS OF CALIFORNIA**

## **1. PURPOSE AND INTENT**

James River Grounds Management, LLC (the “Company”) is committed to protecting the privacy and security of the personal information of individuals who inquire about employment with the Company, our job applicants, employees and their emergency contacts and beneficiaries, independent contractors, board of directors, and corporate officers who are residents of California (“Work-Related Individuals” or “you”). This privacy policy describes how we collect, use, retain, secure and disclose personal information about Work-Related Individuals (our “Information Practices”). The Company is responsible for deciding how it collects, uses, retains, secures, and discloses your personal information.

This privacy policy is intended to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act, and applicable regulations (collectively, the “CCPA”), and other applicable data privacy laws. This privacy policy only addresses the Company’s collection, use and disclosure of employment-related Personal Information and only applies to California residents who interact with the Company in an employment-related capacity. This privacy policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

It is important that you understand this privacy policy, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. If you have any questions about this privacy policy or how we handle your personal information, please contact us at: 855-483-8543 or [privacy@utilservllc.com](mailto:privacy@utilservllc.com).

If you wish to access this privacy policy in an alternate format or require an accommodation to access this privacy policy, please contact us at: [privacy@utilservllc.com](mailto:privacy@utilservllc.com).

Para solicitar una copia de esta política en español, por favor envíe un correo electrónico: [privacy@utilservllc.com](mailto:privacy@utilservllc.com).

## **2. DATA PROTECTION PRINCIPLES**

We collect, use, retain, and share your personal information in accordance with certain data privacy and data protection principles. Specifically, the personal information we collect about you is: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) reasonably necessary and proportionate to achieve these purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for these purposes; and (vi) kept securely. If we intend to collect, use, retain, or share your personal information for any purpose that is incompatible with the purposes for which your personal information was collected, we will obtain your consent to do so.

For the purposes of this privacy policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. “Sensitive personal information” is a subcategory of personal information and means personal information that reveals: (a) an individual’s social security, driver’s license, state identification card, or passport number; (b) an individual’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) an individual’s precise geolocation; (d) an individual’s racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of an individual’s mail, email, and text messages unless the Company is the intended recipient of the communication; (f) an individual’s genetic data; (g) an individual’s biometric information used to uniquely identify the individual; (h) personal information collected and analyzed regarding an individual’s health; and (i) personal information collected and analyzed regarding an individual’s sex life or sexual orientation.

### 3. PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT, USE IT, AND SHARE IT

We collect, receive, use and share personal information for the following work-related individuals. **We do not:**

- sell your personal information;**
- share or disclose your personal information to third parties other than the entities or service providers listed below (for purposes of this policy, references to service providers in this policy includes contractors);**
- share or disclose your sensitive information to third parties for purposes other than those listed below or otherwise permitted by the CCPA;**
- sell or share the personal information of consumers under 16 years of age; or**
- permit third parties to collect your personal information on our behalf other than our service providers listed below.**

#### A. Job Applicants

<p>CATEGORIES OF PERSONAL INFORMATION WE COLLECT</p>	<p><u>Identifiers</u>, such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers.</p> <p><u>Protected categories</u>, such as race, religion, sex (including pregnancy, childbirth, and related medical conditions), disability, age, citizenship status, genetic information, marital status, sexual orientation, gender identity and gender expression, medical condition, political activities or affiliations, military or veteran status, and status as a victim of domestic violence, assault, or stalking.</p> <p><u>Sensitive Personal Information</u>, such as social security number, driver’s license number, state identification card number, passport</p>
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	<p>number, financial account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, an individual’s biometric information used to uniquely identify the individual, personal information collected and analyzed regarding an individual’s health, and personal information collected and analyzed regarding an individual’s sex life or sexual orientation.</p> <p><u>Biometric Information</u>, such as facial recognition.</p> <p><u>Internet or other electronic network activity information</u>, such as browsing history, search history, and information regarding your interaction with an internet website, social media site or application.</p> <p><u>Geolocation information</u></p> <p><u>Professional or employment-related information</u>, such as job preference and work availability, qualifications, employment history and experience; compensation; military service, reference and background check information (including relevant criminal history, credit history and pre-employment test results), post-offer medical and medical examination information and results including drug test results, immigration and work eligibility, and information provided by you during the interview and hiring process.</p> <p><u>Education information relevant to the job</u></p> <p><u>Inferences drawn from the personal information collected to determine your abilities and aptitude</u></p>
<p>SOURCES OF THE PERSONAL INFORMATION</p>	<p>You, your Personal Information that is collected, our recruitment service providers, online hiring sites, background check service providers, biometric information service providers, our IT service providers, our electronic communications equipment, Company personnel (including human resources, management, and IT personnel), applicable law enforcement and governmental agencies, your former employers, references you provide, and publicly available sites and sources.</p>
<p>PURPOSES FOR COLLECTING THE PERSONAL INFORMATION</p>	<p>Hire the best-qualified applicants and evaluate a potential employment relationship with you; to obtain advice from professional advisors; comply with our legal and contractual requirements and requests; comply with legal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; monitor, enforce and investigate our policies, procedures and legal requirements; protect Company and customer information and Company equipment and systems and other security purposes; establish and exercise our legal and contractual rights; contact you regarding your application;</p>

	<p>verify your identity and information provided by you such as educational history, past employment and other qualifications; administer our diversity, equality and inclusion initiatives and perform background checks and drug tests.</p> <p>We do not collect or process sensitive personal information for purposes of inferring characteristics about you.</p>
CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION	<p>Company personnel (including human resources, management, and IT personnel), recruitment service providers, background check service providers, human resources service providers, IT service providers, former employers, references you provide, applicable law enforcement and government agencies, former employers, healthcare professionals, drug testing laboratory personnel, professional advisors and our biometric information service providers.</p>

B. Employees, independent contractors and corporate officers:

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	<p><u>Identifiers</u>, such as a real name, alias, postal address, unique personal identifiers (including the employee ID), online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p> <p><u>Protected categories</u>, such as race, color, national origin, religion, sex (including pregnancy, childbirth, and related medical conditions), disability, age, citizenship status, genetic information, ancestry, marital status, sexual orientation, gender identity and gender expression, AIDS/HIV status, medical condition, political activities or affiliations, military or veteran status, and status as a victim of domestic violence, assault, or stalking.</p> <p><u>Sensitive Personal Information</u>, such as social security number; driver’s license number; state identification card number; passport number; account log-in; financial account; debit card number, credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; union membership; contents of an individual’s mail, email, and text messages unless the Company is the intended recipient of the communication; an individual’s biometric information used to uniquely identify the individual; personal information collected and analyzed regarding an individual’s health; and personal information collected and analyzed regarding an individual’s sex life or sexual orientation.</p> <p><u>Biometric Information</u>, such as facial recognition.</p>
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	<p><u>Internet or other electronic network activity information</u>, such as browsing history, search history, and information regarding your interaction with an internet website, social media site or application.</p> <p><u>Geolocation information</u></p> <p><u>Audio, electronic, visual, thermal, or similar information</u></p> <p><u>Professional or employment-related information</u>, such as immigration and work eligibility; information provided by you during the interview and hiring process; performance management information, such as employment status (full-time or part-time, regular or temporary); work schedule; job assignments; hours worked; business travel information; expatriate and secondment assignments; accomplishments and awards; training and development information; performance evaluation information; workplace safety information; medical or health conditions; job restrictions; drug testing information; workplace accident and illness information; health insurance information; complaint resolution information; discipline and counseling information; and employment termination information.</p> <p><u>Education information relevant to the job</u></p> <p><u>Inferences drawn from the personal information collected to determine your abilities and aptitude</u></p>
<p>SOURCES OF THE PERSONAL INFORMATION</p>	<p>You and your Personal Information that is collected, Company personnel (including human resources, management, and IT personnel); background check service providers; biometric information service providers; our electronic communications equipment; publicly available sites and sources; our IT service providers; and security and other cameras.</p>
<p>PURPOSES FOR COLLECTING THE PERSONAL INFORMATION</p>	<p>Manage our employment relationship with you; comply with our legal and contractual requirements and requests; to obtain advice from professional advisors; comply with legal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; monitor, enforce and investigate our policies, procedures and legal requirements; protect Company and customer information and Company equipment and systems and other security purposes; establish and exercise our legal and contractual rights; implement and administer our diversity, equality, and inclusion initiatives; verify your identity and access rights; arrange and manage work-related travel, events, meetings and other similar activities; workforce development and training; corporate communications; perform background checks and drug tests; and provide you with access to and monitor, maintain and secure</p>

	our systems, facilities, equipment, networks and electronic databases.
CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION	Company personnel (including human resources, management, and IT personnel); applicable law enforcement and government agencies; our human resources service providers; customers; IT service providers, outside counsel; travel providers (such as travel agency, airlines, hotels); drug testing laboratory personnel; biometric information service providers; background check service providers; healthcare professionals; union and their representatives; insurance carriers; professional advisors and social media and other corporate communications.

C. Our Employees' Emergency Contacts

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	<u>Identifiers</u> , such as a name, alias, postal address, telephone number, and email address.  <u>Protected categories</u> such as marital status or other family status.
SOURCES OF THE PERSONAL INFORMATION	You and your emergency contacts.
PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	Manage our employment relationship with you; contact your designated emergency contact persons in the event of an emergency; comply with our legal and contractual requirements and requests; comply with legal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; monitor, enforce and investigate our policies, procedures and legal requirements; protect Company and customer information and Company equipment and systems and other security purposes, and to establish and exercise our legal and contractual rights.
CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION	Company personnel (including human resources, management, and IT personnel), applicable law enforcement and government agencies, and our human resources and IT service providers.

D. Our Employees' Beneficiaries

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	<u>Identifiers</u> , such as a real name, alias, postal address, telephone number email address, social security number, or other similar identifiers.  <u>Protected categories</u> , such as race, color, national origin, religion, sex (including pregnancy, childbirth, and related medical conditions), disability, age, citizenship status, genetic information, ancestry, marital status, sexual orientation, gender identity and gender expression, AIDS/HIV status, medical condition, political activities or affiliations,
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	<p>military or veteran status, and status as a victim of domestic violence, assault, or stalking.</p> <p><u>Sensitive Personal Information</u>, such as social security number, driver’s license number, state identification card number, union membership, genetic data, personal information collected and analyzed regarding an individual’s health, and personal information collected and analyzed regarding an individual’s sex life or sexual orientation.</p> <p><u>Professional or employment-related information</u>, such as employer name and contact information and employment health insurance information.</p> <p>Information necessary to process benefits claims including health and financial information.</p>
SOURCES OF THE PERSONAL INFORMATION	You, your beneficiaries, your beneficiaries’ employers, healthcare providers, and human resources service providers such as benefits administrators and insurance companies.
PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	Manage our employment relationship with you; administer benefits programs for beneficiaries of our employees; comply with our legal and contractual requirements and requests; comply with legal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; monitor, enforce and investigate our policies, procedures and legal requirements; to obtain advice from professional advisors; protect Company and customer information and Company equipment and systems and other security purposes, and to establish and exercise our legal and contractual rights.
CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION	Company personnel (including human resources, management, and IT personnel), professional advisors, healthcare providers, applicable law enforcement and government agencies, insurance carriers, and our human resources service providers such as benefits administrators and insurance companies.

E. Our Board of Directors:

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	<p><u>Identifiers</u>, such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, driver’s license number, or other similar identifiers.</p> <p><u>Sensitive Personal Information</u>, such as driver’s license number.</p> <p><u>Internet or other electronic network activity information</u>, such as browsing history, search history, and information regarding your interaction with an internet website, social media site or application.</p>
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	<p><u>Professional or employment-related information</u>, such as qualifications and experience, reference and other due diligence information, W-9 Information and business or employer name.</p> <p><u>Education information relevant to the services provided.</u></p> <p><u>Inferences drawn from the personal information collected to determine your abilities and aptitude.</u></p>
SOURCES OF THE PERSONAL INFORMATION	You, public business sources, references and background check service providers.
PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	Establish and manage our manage our relationship with you; comply with our legal and contractual requirements and requests; comply with legal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; monitor, enforce and investigate our policies, procedures and legal requirements; protect Company and customer information and Company equipment and systems and other security purposes; obtain advice from professional advisors; perform background checks and to establish and exercise our legal and contractual rights.
CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION	Company personnel (including human resources, management, and IT personnel), customers, shareholders, the public, applicable law enforcement and government agencies, background check providers, professional advisors, and service providers.

**4. Privacy Rights**

As a California resident, you have the following privacy rights regarding your personal information, subject to certain exceptions:

- The right to know and right to access the personal information we have collected about you, including the categories of personal information; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting, selling, or sharing personal information; the categories of third parties to whom the business discloses personal information; and the specific pieces of personal information the business has collected about the consumer;
- The right to delete personal information that we have collected from you;
- The right to correct inaccurate personal information that we maintain about you;
- The right of portability, or right to have us transfer your personal information to other persons or entities upon your request;



- The right to limit the use of your sensitive information if we decide in the future to use such information for purposes other than the purposes listed above; and
- The right not to be discriminated or retaliated against for exercising your privacy rights.

You can exercise your privacy rights by submitting a request to us by [clicking here](#), emailing us at: [privacy@utilservllc.com](mailto:privacy@utilservllc.com), calling us at: 855-483-8543; or asking our Human Resources department for a written request form. To protect the security of your personal information, we will require you to provide us with identifying information for you such as personal email address, personal telephone number, employee identification number, and/or other information that we can match with the personal information we have collected about you to verify your identity.

You may use an authorized agent to request access to or deletion of your personal information. We will require your authorized agent to provide us with either (1) a 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. Further, we will require you or your authorized agent to provide us with identifying information to verify your identity. We may also require you to either verify your own identity directly with us or directly confirm with us that you provided the authorized agent permission to submit the request.

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. Generally, we will respond to your request within 45 days. If we need more time to respond, we will provide you with notice and an explanation of the reason we need more time to respond. We may deny your request if we cannot verify your identity or are legally permitted to deny your request. If we deny your request, we will explain the basis for the denial, provide or delete any personal information that is not subject to the denial, and refrain from using the personal information retained for any purpose other than permitted by the denial. We will maintain a record of your request and our response for 24 months.

## **5. OPT-OUTS AND PREFERENCE SIGNALS (GLOBAL PRIVACY CONTROL)**

Because the electronic tools that we use are for managing our employment relationship with you, we do not recognize Opt-Out Preference Signals, such as the Global Privacy Control (GPC), related to such employment relationship. As noted above, none of our uses or disclosures qualify as the sale or sharing of information for which you have an opt-out right.

## **6. DATA SECURITY**

While no data security system can fully protect personal information from unauthorized data breaches, the Company has implemented reasonable safeguards and controls, consistent with its legal obligations under California and other local, state and federal laws. The Company is committed to: (i) seeking to safeguard all personal information that you provide to us; (ii) seeking to ensure that it remains confidential and secure; and (iii) taking all reasonable steps to ensure that

personal privacy is respected. All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorized access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members of the Company and our services providers who need to know that information for the purposes identified in our privacy policy and privacy notices.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **7. DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, we retain personal information for the duration of our relationship with you plus any legally required record or data retention period and/or any period of time necessary to exercise our legal rights. Thereafter, we will securely destroy your personal information in accordance with the Company's record retention policies, or in some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **8. PERSONAL INFORMATION OF MINORS**

The Company does not sell or share personal information for individuals under the age of 16.

## **9. CHANGES TO THIS PRIVACY POLICY**

As we strive to improve our practices, we may revise the Company's privacy policy from time to time. This privacy policy is not a contract and we reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy. It is your responsibility to check this policy from time to time for any changes.

This privacy policy was last updated on June 30, 2023.

## **10. QUESTIONS AND FURTHER INFORMATION**

If you have any questions or would like further information regarding this privacy policy or our privacy practices, please contact us at: 855-483-8543 or [privacy@utillservllc.com](mailto:privacy@utillservllc.com).