



## CALIFORNIA PRIVACY NOTICE AND POLICY FOR JOB APPLICANTS

The California Privacy Rights Act (“CPRA”) requires Triumvirate Environmental (“Company” or “we” or “our”) to provide to California job applicants a description of our information practices, an explanation of the rights that the CPRA confers on you regarding your personal information, and an explanation of how you can exercise your CPRA rights and what you can expect from the process. This Notice at Collection and Privacy Policy is intended to notify job applicants of such information.

### CATEGORIES OF PERSONAL INFORMATION WE HAVE COLLECTED IN THE PAST 12 MONTHS

The Company has collected the following categories of personal information and sensitive personal information:

- A. **Identifiers** such as name, address, email address, telephone number, Social Security number, driver’s license number, state identification card, passport number, online identifier, IP address, and date of birth;
- B. **Personal information as defined in the California Customer Records Act (Section 1798.80(e))** such as physical characteristics, signature, banking or payment card information, and medical information, including COVID-19 symptom-related, testing related, and vaccination-related information;
- C. **Characteristics of protected classifications under California or federal law** such as race, ethnicity, sex, gender, marital status, age, disability status, medical or mental condition, veteran status, citizenship, immigration status, and familial status;
- D. **Internet or other electronic network activity information** such as internet and email activity, and information regarding interaction with Company websites, applications, and information technology resources;
- E. **Professional or employee-related information** such as employment history and employment-related assessments and evaluations;
- F. **Education information** such as education records and transcripts, including non-public educational information); and
- G. **Inferences drawn from any of the above categories to determine characteristics, preferences, attitudes, abilities, or behavior;** and
- H. **Sensitive Personal Information** such as personal information that reveals a job applicant’s social security number, driver’s license, state identification card, passport number, financial account information, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, or the contents of email transmitted to the Company; personal information collected and analyzed concerning a job applicant’s health; and information from the processing of biometric information for the purpose of uniquely identifying a job applicant.

### CATEGORIES OF SOURCES FROM WHICH PERSONAL INFORMATION IS COLLECTED

The categories of sources from which personal information, including sensitive personal information, is collected include:

- (a) Directly from job applicants;

- (b) From references provided by job applicants; and
- (c) From Company websites and applications; and
- (d) From business partners, government sources, and third party vendors

## **PURPOSES FOR COLLECTING PERSONAL INFORMATION**

The Company may collect personal information, including sensitive personal information, for any of the following business purposes:

- (a) To comply with employment laws and regulations;
- (b) To administer human resource policies and other Company policies;
- (c) To communicate with job applicants;
- (d) To recruit and evaluate candidacy for employment;
- (e) To identify potential symptoms relating to communicable diseases (including COVID-19), prevent the spread of disease, and conduct contact tracing; and
- (f) To help promote workplace health, security, and safety;
- (g) For due diligence, compliance, and corporate administration purposes;
- (h) To anonymize or de-identify personal information for business purposes; and
- (i) To comply with local, state, and federal laws, regulations, ordinances, guidelines, and orders, including those relating to COVID-19.

## **SALE AND SHARING OF PERSONAL INFORMATION**

The Company has not sold or shared (as defined under the CPRA) job applicant personal information in the preceding 12 months (including any information of persons under 16 years of age).

## **DISCLOSURE OF PERSONAL INFORMATION FOR BUSINESS PURPOSES**

In the preceding 12 months we have disclosed the above categories of personal information and sensitive personal information for business purposes, including administrative purposes, to our service providers and contractors, including those for recruiting, benefits and human resource policy administration, web analytics, data processing, auditing, and other administrative purposes. The service providers and contractors are obligated not to disclose or use personal information outside of the business relationship with us or for purposes not permitted in their contract with us.

## **USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION**

We do not use or disclose sensitive personal information except in connection with those business purposes permitted under Section 1798.121 of the CPRA, including to perform services on behalf of our business.

## **YOUR RIGHTS UNDER THE CPRA**

### ***(1) Right to Know***

You have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- (a) The categories of personal information we have collected about you;
- (b) The categories of sources from which the personal information was collected;
- (c) The business or commercial purpose for collecting, selling, or sharing personal information;
- (d) The categories of third parties to whom we disclose personal information; and
- (e) The specific pieces of personal information we have collected about you (subject to exceptions and restrictions in the CPRA regarding disclosure of certain personal information).

### ***(2) Right to Delete Personal Information***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers and contractors to delete) your personal information from our records, unless an exception applies (for example, if we are required by law to retain that information). If your request is denied, the response we provide to your verifiable consumer request will explain the reason for denying your request.

### ***(3) Right to Correct Inaccurate Personal Information***

You have the right to request that we correct inaccurate personal information that we maintain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will correct (and direct our service providers and contractors to correct) inaccurate personal information that we maintain about you, unless an exception applies. If your request is denied, the response we provide to your verifiable consumer request will explain the reason for denying your request.

### ***(4) Right to Opt-Out of the Sale or Sharing of Personal Information***

We do not sell or share (as defined under the CPRA) personal information that we collect from you and therefore do not provide a method to opt-out from such activities.

### ***(5) Right to Limit Use of Sensitive Personal Information***

We do not use or disclose sensitive personal information that we have collected from you for purposes other than those business purposes permitted under Section 1798.121 of the CPRA and therefore do not provide a method to limit such activities.

### ***(6) Non-Discrimination***

We will not discriminate against you or retaliate against you for exercising any of your CPRA rights.

## **HOW TO EXERCISE YOUR CPRA RIGHTS**

To exercise your right to know, right to delete, and right to correct, please submit a verifiable consumer request to us by either:

- emailing [humanresources@triumvirate.com](mailto:humanresources@triumvirate.com)
- calling us at (888) 834-9697

### ***Our Verification Process***

Upon receipt of your request, we will provide directions on identity verification requirements which will include submission of pieces of personal information that we can match to our records. Once you provide such information and assuming we are able to verify your identity by matching the information you provided to our records, we will begin to gather information to respond to your request. For requests to correct, we may require you to provide additional documentation to rebut any of our own documentation that the personal information that you are requesting to correct is accurate.

No later than 10 business days after receiving your request, we will confirm receipt of the request and provide information about how we will process the request. We will endeavor to respond to a verifiable consumer request within 45 calendar days of its receipt. If we require more time (we may take up to 45 additional days), we will inform you of the reason and extension period in writing. If we cannot verify the request within the 45 calendar days, we may deny the request. If we deny your request, we will inform you of the reason for its denial.

### ***Authorized Agents***

You may use an authorized agent to submit a request to know, request to delete, or request to correct on your behalf. The authorized agent can submit such requests on your behalf by following the instructions in the “How To Exercise Your Rights” section above.

When you use an authorized agent to submit a request to know, request to delete, or request to correct, we may require the authorized agent to provide proof that you gave the agent signed permission to submit the request. We may also require you to do either of the following: (1) verify your own identity directly with us; or (2) confirm directly with us that you provided the authorized agent permission to submit the request.

### ***Contact Information***

If you have any questions or concerns about our privacy policies or information practices, including, but not limited to, the ways in which we collect and use your personal information, or your choices and rights regarding such use, or if you wish to exercise your rights under the CPRA, please do not hesitate to contact: Triumvirate’s Human Resources department.

This Privacy Notice and Policy can be found at <https://www.triumvirate.com/careers>