

# CG ROXANE LLC

## CCPA NOTICE

### Notice for Job Applicants/Employees Residing in California

In compliance with the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act, collectively California Privacy Laws, CG Roxane LLC (“CGR”) is providing you with this Notice for Job Applicants (“Notice”) to inform you about:

- The categories and types of Personal Information CGR collects about applicants;
- The purposes for which CGR uses your Personal Information;
- Sources of Your Personal Information;
- Retention Period;
- How CGR May Disclose Your Personal Information;
- California Consumer Privacy Rights;
- How to Submit a Request; and
- Changes to this Notice.

“Personal Information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular applicant.

### Personal Information We Collect

In the course of applying for a position with CGR, we may collect the following categories and types of Personal Information. This information may be used for the following identified purposes during the application process, prior to onboarding as an employee:

<b>Categories of Personal Information Collected</b>	<b>Purposes Personal Information is Used.</b>
<u>Identifiers and Contact information.</u> This category includes names, addresses, telephone numbers, mobile numbers, email addresses, dates of birth, Social Security numbers, driver’s license or state identification numbers, bank account information, dependent and beneficiary information (names, dates of birth, Social Security numbers) and other similar contact information and identifiers.	<ul style="list-style-type: none"><li>• Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding</li><li>• Processing payroll and employee benefit plan and program administration including enrollment and claims handling</li><li>• Maintaining personnel records and record retention requirements</li><li>• Communicating with employees and/or employees’ emergency contacts and plan beneficiaries</li><li>• Complying with applicable state and federal labor, employment, tax, benefits, workers’ compensation, disability, equal employment opportunity, workplace safety, and related laws</li><li>• Preventing unauthorized access to or use of the CGR’s property, including the CGR’s information systems, electronic devices, network, and data</li></ul>

	<ul style="list-style-type: none"> <li>• Ensuring employee productivity and adherence to the CGR’s policies</li> <li>• Investigating complaints, grievances, and suspected violations of company policy</li> </ul>
<p><u>Protected classification information.</u> This category includes characteristics of protected classifications under California and federal law.</p>	<ul style="list-style-type: none"> <li>• Complying with applicable state and federal Equal Employment Opportunity laws</li> <li>• Design, implement, and promote the CGR’s diversity and inclusion programs</li> <li>• Investigate complaints, grievances, and suspected violations of CGR policy</li> </ul>
<p><u>Internet or other electronic network activity information.</u> This category includes without limitation:</p> <ul style="list-style-type: none"> <li>• all activity on the CGR’s information systems, such as internet browsing history activity, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames and passwords</li> <li>• all activity on communications systems including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an Employee’s use of CGR-issued devices</li> </ul>	<ul style="list-style-type: none"> <li>• Facilitate the efficient and secure use of the CGR’s information systems</li> <li>• Ensure compliance with CGR information systems policies and procedures</li> <li>• Complying with applicable state and federal laws</li> <li>• Preventing unauthorized access to, use, or disclosure/removal of the CGR’s property, records, data, and information</li> <li>• Enhance employee productivity</li> </ul> <p>Investigate complaints, grievances, and suspected violations of CGR policy</p>
<p><u>Geolocation data.</u> This category includes GPS location data from CGR-issued mobile devices and CGR-owned vehicles.</p>	<ul style="list-style-type: none"> <li>• Improve safety of employees, customers and the public with regard to use of CGR property and equipment</li> <li>• Preventing unauthorized access, use, or loss of CGR property</li> <li>• Improve efficiency, logistics, and supply chain management</li> <li>• Ensuring employee productivity and adherence to the CGR’s policies</li> <li>• Investigate complaints, grievances, and suspected violations of CGR policy</li> </ul>
<p><u>Professional and employment-related information.</u> This category includes without limitation:</p> <ul style="list-style-type: none"> <li>• data submitted with employment applications including, employment history, employment recommendations, etc.</li> <li>• background check and criminal history;</li> <li>• work authorization</li> <li>• professional licenses</li> <li>• educational degrees</li> <li>• fitness for duty data and reports (upon return from a medical leave of absence)</li> <li>• performance and disciplinary records</li> <li>• salary and bonus data</li> <li>• benefit plan enrollment, participation, and claims information</li> <li>• leave of absence information including religious and family obligations, physical and mental health data concerning employee and his or her family members</li> </ul>	<p>Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding</p> <ul style="list-style-type: none"> <li>• Employee benefit plan and program design and administration, including leave of absence administration</li> <li>• Maintaining personnel records and complying with record retention requirements</li> <li>• Communicating with employees and/or employees’ emergency contacts and plan beneficiaries</li> <li>• Complying with applicable state and federal labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws</li> <li>• Business management</li> <li>• Preventing unauthorized access to or use of the CGR’s property, including the CGR’s information systems, electronic devices, network, and data</li> <li>• Ensuring employee productivity and adherence to the CGR’s policies</li> <li>• Recruiting</li> <li>• Investigating complaints, grievances, and suspected violations of CGR policy</li> </ul>

<u>Education information.</u> This category includes education history.	Evaluate an individual’s appropriateness for hire, a participation position at the CGR, or promotion to a new position.
<u>Inferences drawn from the PI in the categories above.</u>	<ul style="list-style-type: none"> <li>• Engaging in human capital analytics, including but not limited to, identifying certain correlations about individuals and success on their jobs, analyzing data to improve retention, and analyzing employee preferences to inform HR Policies, Programs and Procedures.</li> </ul>

**Source of Your Personal Information**

During the application process, CGR may collect Personal Information about you from the following sources:

- **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process;
- **Vendors and service providers**, for example, recruiters;
- **Third parties**, for example, job references, affiliated companies, professional employer organizations or staffing agencies;
- **Public internet sources**, for example, social media, job boards, public profiles, and other public online sources;
- **Public records**, for example, court records, and credentialing and licensing organizations;
- **Automated technologies on CGR’s electronic resources**, for example, to track logins and activity on CGR’s careers page;
- **Surveillance/recording technologies installed by CGR**, for example, video surveillance in common areas of CGR facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law;
- **Government or administrative agencies**, for example, law enforcement or public health authorities;
- **Acquired company**, if CGR acquired your employer, CGR might collect Personal Information from that employer.

**Retention Period**

CGR retains your Personal Information for as long as is necessary to process your application for employment, process your payroll, administer your benefits, etc. and in accordance with the CGR’s data retention schedule. CGR may retain Personal Information for longer if it is necessary to comply with CGR’s legal or reporting obligations (for example, if the company is required to retain your data to comply with applicable laws), resolve disputes, enforce legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. CGR may also retain Personal Information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your Personal Information, CGR considers various factors such as the amount, nature, and sensitivity of your

information; the potential risk of unauthorized access, use or disclosure; the purposes for which the information is collected; and applicable legal requirements. Personal Information does *not* include certain categories of information, such as publicly available information from government records, and deidentified or aggregated consumer information.

### How We May Disclose Your Personal Information

To carry out the purposes outlined above, CGR may disclose Personal Information to service providers or other third parties, such as background check vendors, third-party staffing vendors, information technology vendors, outside legal counsel, and state or federal governmental agencies. The Company does not sell or share, as those terms are defined under applicable law, the above categories of Personal Information. CGR may add to the categories of Personal Information it collects and the purposes for which it uses that information.

### California Consumer Privacy Rights

Individuals who are residents of the State of California have certain individual rights, which are outlined below:

*Right To Know About Personal Information Collected or Disclosed.* As a California resident, you have the right to request additional information, beyond that disclosed above, regarding the following, to the extent applicable:

- the categories of personal information the Company collected about you;
- the categories of sources from which that personal information was collected;
- the categories of personal information sold or disclosed for a business purpose;
- the business or commercial purposes for which that information was collected, sold, or shared;
- the categories of third parties to whom the information was sold or disclosed;
- the specific pieces of personal information collected.

Upon receipt of a verifiable request to know (see below), and as required by applicable law, we will provide a response to such request.

*Right To Request Deletion of Your Personal Information.* You have the right to request that CGR delete the personal information we collected or maintain about you. Once we receive your request, CGR will let you know what, if any, personal information we can delete from our records, and will direct any service providers and contractors to whom we disclosed your Personal Information to also delete your personal information from their records. There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, without limitation, when the information at issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the

Company and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

Upon receipt of a verifiable request to delete (see below), and as required by applicable law, we will provide a response to such requests.

*Right to Request Correction.* You have the right to request that the Company correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it. Upon receipt of a verifiable request to correct (see below), and as required by the CCPA, we will provide a response to such requests.

*Right to Limit Use or Disclosure of Sensitive Personal Information.* You have the right, subject to certain exceptions, to request that we limit the use and disclosure of your sensitive personal information, as that term is defined in the CCPA. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will take appropriate steps to respond to your request.

*Right to Non-Discrimination for the Exercise of Your Privacy Rights.* We will not discriminate or retaliate against you for exercising any of the rights described above.

### How to Submit a Verifiable Request

To submit a CCPA Rights request as outlined above, please contact us at [privacy@cgroxane.com](mailto:privacy@cgroxane.com). We reserve the right to only respond to verifiable requests that are submitted as instructed. Please note, CGR may not be able to comply with your request if we are unable to confirm your identity or connect the information you submit in your request with Personal Information in our possession. Therefore, you should include information you have previously submitted to Littler for the verification process. If we are unable to verify you, we may request additional information. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

### Changes to this Notice

As required by California Privacy Laws, CGR will review and revise this Notice on an annual Basis and reserves the right to amend this CCPA Section at our discretion and at any time. Updates to this Notice will be posted on CGR's job applicant site and CGR's Employee Handbook.