

# California Privacy Policy

Employees, Prospective Employees and Independent Contractors

#### **California Residents**

California residents who are employees, prospective employees and independent contractors of Windes, Inc. (also referred to as "we," "us," and "our") have certain additional rights over the California Personal Information ("PI") that we collect. This California Privacy Policy describes our information practices, the rights you may have with respect to the personal information we collect from and about you, and how you can exercise those rights.

#### Personal Information We Have Collected in the Past 12 Months

Categories of information we collect	Categories of Sources	Purpose for which the information will be used
Identifiers such as your name, date of birth, mailing address, email address, telephone number(s), signature, and sensitive information such as your Social Security Number, and driver's license number or passport number.	• You	<ul> <li>To identify you, communicate with you, process our payroll, and provide you with compensation and company-sponsored benefits.</li> <li>To comply with legal requirements.</li> </ul>
Your bank account information.	• You	To direct deposit funds to your bank account, if you so instruct.
Health and medical information.	<ul><li>You</li><li>Benefits providers</li></ul>	<ul> <li>To review and consider accommodation requests for non-standard work arrangements.</li> <li>To provide you with benefits and process claims.</li> </ul>
Educational information, such as the educational institutions you have attended and your degrees.	<ul> <li>You</li> <li>Background check providers (that you authorize)</li> </ul>	To determine your qualifications and make employment decisions.
Professional information, such as your employment history, professional licenses, certifications, and references.	<ul> <li>You</li> <li>Agencies, such as the California Board of Accountancy</li> <li>Public records</li> <li>Former employers</li> </ul>	<ul> <li>To determine your qualifications and make employment decisions.</li> <li>To promote and manage our business relationships.</li> </ul>

Categories of information we collect	Categories of Sources	Purpose for which the information will be used
Information reported to us as a result of a consumer report or investigative consumer report that you authorize.	<ul><li>You</li><li>Background check providers (that you authorize)</li></ul>	To make employment decisions and to determine whether to entrust you with confidential information.
Visual information, such as images from security cameras in certain secure areas in our offices.	• You	To maintain the security of our premises, information and equipment.
Visual information, such as your photograph.	• You	<ul> <li>To promote our business.</li> <li>To maintain the security of our premises, information and equipment.</li> <li>To comply with legal requirements.</li> </ul>
Information regarding your electronic network activity using our equipment, such as systems accessed, internet browsing history, usage and e-mail content.	• You	To monitor employee activities, to maintain the security of our systems, and to detect improper activity.
Information regarding your electronic network activity on our website, www.windes.com, such as IP address, URL you came from, browsing history, and interaction with content on the website.	• You	To analyze traffic on our website, to maintain security, to provide for a better user experience, and to gather information to serve personalized advertisements through cross-context behavioral advertising.
Commercial information in connection with business-related expenses that you submit to us for reimbursement.	• You	To evaluate your expense report and to reimburse you for authorized expenses.
Voluntary identification of your race/ethnicity, gender, age, disability status and veteran status (you have the option to choose not to self-identify).	• You	<ul> <li>To comply with government reporting requirements.</li> <li>To respond to questionnaires from our clients, prospective clients and business partners.</li> </ul>



Categories of information we collect	Categories of Sources	Purpose for which the information will be used
Records of your physical access to our parking facilities and secure areas in our offices.	• You	To maintain and monitor the security of our personnel, equipment, information and premises.
Your voluntary disclosure of medical information, such as whether you have been vaccinated for COVID-19.	• You	To maintain a healthy work environment.

## Categories of Information We Have Sold or Shared in the Last 12 Months

We do not sell, share or disclose to third parties any California PI we collect from employees, prospective employees or independent contractors in those roles.

If you have visited our public website <a href="www.Windes.com">www.Windes.com</a>, we have shared your IP address, the URL you came from, and your interaction with the website with analytics providers, third-party advertising networks, and social media platforms for their use in cross-context behavioral advertising across multiple websites.

#### Consumers Under the Age of 16

We do not have actual knowledge that we sell or share California Personal Information of minors under 16 years of age.

#### **Sensitive Personal Information**

We use and disclose sensitive California Personal Information only as permitted by law.

### **Your Privacy Rights**

**The right to know.** You have the right to know what California Personal Information we have collected about you, including the categories of California Personal Information, the categories of sources from which the California Personal Information was collected, the business or commercial purpose for collecting, selling or sharing California Personal Information, the categories of third parties to whom we disclose California Personal Information, and the specific pieces of California Personal Information we have collected about you.

**The right to delete.** You have the right to delete California Personal Information that we have collected from you, subject to certain exceptions.

**The right to correct.** You have the right to correct inaccurate California Personal Information that we maintain about you.

**The right to opt-out.** You have the right to opt-out of the sale or sharing of your California Personal Information. You can visit our Notice of Right to Opt-Out of Sale or Sharing <a href="here">here</a>.

The right to limit use of sensitive personal information. If a business uses or discloses sensitive California Personal Information for reasons other than those permitted by law, you have the right to limit the use and disclosure of that information. We use or disclose sensitive California Personal Information only as permitted by law.

The right not to receive discriminatory treatment. You have the right not to receive

discriminatory treatment by us for the exercise of your privacy rights, including the right not to be retaliated against for the exercise of your privacy rights.

## **How You Can Exercise Your Privacy Rights**

You may exercise your privacy rights by calling 844-4WINDES or 844-494-6337 (toll free), or by completing the interactive web form accessible <a href="here">here</a> or at <a href="https://windes.com/contact-us/">https://windes.com/contact-us/</a>.

We will confirm receipt of your request. We will acknowledge receipt of your request within 10 business days.

We will verify your identity. We will match pieces of personal information provided by you with personal information maintained by us that we have determined are reliable. We may also require that you submit a signed declaration under penalty of perjury stating that you are the individual whose personal information is the subject of the request. Our verification process will vary depending on the nature of your request and the sensitivity of the information. In some instances there may be no reasonable method by which we can verify your identity.

**We will respond**. We will respond to your request no later than 45 calendar days after we receive the request. If we cannot respond to your request within that time, we may notify you that we may take up to an additional 45 calendar days to respond, and we will explain why we need additional time.

You may designate an authorized agent to submit a request on your behalf. To have another person submit a request on your behalf, you or they may call us at 844-4WINDES or 844-494-6337 (toll free), or by completing the interactive web form accessible <a href="here">here</a> or at <a href="https://windes.com/contact-us/">https://windes.com/contact-us/</a>. You will need to provide us with written permission authorizing the other person to submit a request to know or delete on your behalf. We will give you instructions on how to send the written authorization to us. We will still verify your identity and will verify that you have given your authority to another person.

#### **How We Process Opt-Out Preference Signals**

An opt-out preference signal is a signal that is sent by a platform or browser that clearly communicates your choice to opt-out of the sale and sharing of personal information. We process opt-out preference signals in a frictionless manner. You can implement an opt-out preference signal through the privacy controls available on your web browser, or by downloading a browser extension that can be enabled to support your single opt-out preference signal. Your opt-out preference signal will apply to your device's browser. To learn more about how to implement opt-out preference signals and global privacy controls, please consult your browser's privacy settings or visit Global Privacy Control.

## **Contact for more Information**

If you have questions or concerns about our information practices, you may contact us at <a href="https://windes.com/contact-us/">https://windes.com/contact-us/</a> or 844-494-6337. Alternatively, you may contact us at:

Windes 3780 Kilroy Airport Way, Suite 600 Long Beach, CA 90806 United States

#### **Date Last Updated**

December 2022