



Notice of Employment Privacy Practices

Total Safety U.S., Inc.

Policy

Document #:	CPL-105
Revision #:	00 (errata)
Revision Date:	07/28/2022
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SCOPE

This **Notice of Employment Privacy Practices** (the “**Notice**”) applies to all current and former Total Safety employees located in the United States including employees who are California Residents whose personal information is collected by Total Safety U.S., Inc. (“Total Safety,” “Company” or “We” or “we”) in the following situations. We refer to such individuals as the “Individual” or “You” or “you” throughout this Notice:

- In connection with a job application;
- In connection with being an employee of, owner of, director of, officer of, medical staff member of, or contractor of Total Safety (collectively referred to as “Workforce Member”), to the extent that the personal information is collected and used by Total Safety solely within the context of such role or former role as a Workforce Member of Total Safety.
- In connection with emergency contact information of the Workforce Member, to the extent that the personal information is collected and used solely within the context of having an emergency contact on file.
- Personal information that is necessary for the business to retain to administer benefits for another natural person relating to the Workforce Member to the extent that the personal information is collected and used solely within the context of administering those benefits.

We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other applicable privacy legislation. Any terms defined in the CCPA have the same meaning when used in this Notice. For California residents, we also provide the relevant sections of the CCPA.

INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual (“**personal information**”).

Unless otherwise required by applicable law, we will only use your personal information in accordance with this Notice. We take steps to ensure that the personal information that we collect about Individuals is adequate, relevant, not excessive and used for limited purposes. In order to carry out our activities and obligations as an employer, we may collect, store, and use information as set out in the categories of personal information listed below. In particular for the purposes of this Notice, Total Safety has collected the following categories of personal information about Individuals within the last twelve (12) months:

Category:	This Includes:	Collected?
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, social insurance number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, social insurance number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), 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), sexual orientation, veteran or military status, genetic information (including familial genetic information), or information regarding an employee's request for family care leave, leave for an employee's own serious health condition, and Pregnancy Disability Leave.	Yes



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D. Biometric information.	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.	Yes
E. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
F. Internet or other electronic network activity information.	Browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Yes
G. Geolocation data.	Information collected through GPS technology.	Yes
H. Inferences.	Inferences drawn from any of the information identified in this subdivision to create a profile about You reflecting Your preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

For the purposes of this Notice, and in accordance with CCPA and other applicable privacy legislation, personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated personal information.
- Other information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data.
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

HOW WE COLLECT INFORMATION

Total Safety obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from your curriculum vitae, cover letter or from forms you complete in connection with your job application or application for the Company's benefits. We will also collect the personal information you provide to us throughout the duration of your employment with Total Safety.
- From our service providers. For example, for any new hires, we will collect background check information regarding any such new hire from a third-party vendor that performs a service on the Company's behalf.
- From Workforce Members. For example, if a Workforce Member provides your personal information as a reference in connection with a job application or in connection with an application for Company-provided benefits.
- From benefits administrators. We may receive information about you from the companies that administer the benefits plans offered by Total Safety.
- From third parties. For example, a recruiter may provide your information to us in connection with our search for a Workforce Member.

USE OF PERSONAL INFORMATION

We may use the personal information we collect for one or more of the following purposes:

- To support the Company's organizational and operational functions.
- To provide services and benefits to you as a Total Safety Workforce Member,

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- To properly administer the Company's workforce and its benefits and compensation programs.
- To evaluate your candidacy or performance as a Total Safety Workforce Member.
- To respond to law enforcement requests and as required or permitted by applicable law, court order, subpoena, or governmental regulations.
- As directed by you.
- Education and training requirements.
- Complying with health and safety obligations.
- As otherwise described to you when collecting your personal information or as otherwise set forth in the CCPA or other applicable privacy legislation.

We will only use your personal information for the purposes we collected it for. If we need to use your personal information for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may use your personal information where required by applicable law or regulation.

SHARING PERSONAL INFORMATION

In connection with the Company's collection and use of your personal information as described above, Total Safety may disclose your personal information in the following ways:

- With our parent company, subsidiaries and affiliates (including inside or outside the United States).
- With service providers and benefits administrators.
- As directed by you.
- To comply with the law or to protect the Company. This includes responding to court orders or subpoenas, or defending Total Safety in a lawsuit. This also includes sharing your personal information if a government agency or investigatory body requests this data. We may share also information when we are investigating an allegation or potential fraud.
- As otherwise described to you when collecting your personal information or as otherwise set forth in the CCPA or other applicable privacy legislation.

We will only disclose your personal information to third parties when required by law or to our employees, contractors, designated agents, or third-party service providers who require it to assist us with administering the employment relationship with you. Third-party service providers include, but are not limited to, payroll processors and benefits administration providers. These third-party service providers may be located outside of the United States.

We require all our third-party service providers to implement appropriate security measures to protect your personal information in a way that is consistent with our policies and any data security obligations applicable to us as your employer. We do not permit our third-party service providers to use your personal information for their own purposes. We only permit them to use your personal information for specified purposes in accordance with our instructions.

SECURITY AND RETENTION

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal information against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal information to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer an employee we will retain and securely destroy your personal information.



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ACCESS AND CORRECTION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your employment. By law you have the right to request access to and to correct the personal information that we hold about you or withdraw your consent to the use of your personal information under certain circumstances. If you want to review, verify, correct, or withdraw consent to the use of your personal information, please contact us. Any such communication must be in writing.

CHANGES TO OUR NOTICE

Total Safety reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will update the Notice's effective date and make available the updated Notice as required by law.



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CONTACT INFORMATION

If you have any questions, comments or concerns with respect to this Notice, please feel free to contact us at privacy@totalsafety.com. You may also write to us at the following address:

Total Safety US, Inc.
Attn: Privacy
4210 Malone Drive
Pasadena TX 77507

Date Published	Author	Approved by	Revision	Reason for Revision
09/09/20	Diane Dix	Executive Comm	00	Original
03/08/2021	Diane Dix	N/A	00 (errata)	Document numbering, revised header
07/28/2022	Amy Brast	N/A	00 (errata)	Changed address