



## Applicant Notice and Privacy Policy

Last Updated: **September 1, 2023**

**Galls, LLC (“Company”)**, along with its subsidiaries and affiliated companies, including but not limited to **US Patriot, LLC**, take your privacy seriously. We want you to know how we collect, use, and disclose your personal information.

**California Notice at Collection:** Company collects the personal information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 5. We do not sell your personal information or disclose it for cross-context behavioral advertising (“sharing”). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

### EEO Statement

Company is an equal employment opportunity (EEO) employer. For more information about Company’s EEO policy, click here: <https://www.galls.com/pages/employment>.

### Assistance For The Disabled

Alternative formats of this Privacy Policy are available to individuals with a disability. Please contact [humanresource@galls.com](mailto:humanresource@galls.com) for assistance.

### This Notice and Privacy Policy explains:

1. The categories of personal information we collect about you
2. The categories of sources from which we collect your personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. How long we keep your personal information
6. Additional information for applicants who are California residents
7. Changes to this Privacy Policy

### Scope:

This Privacy Policy applies to the personal information of individuals in their role as job applicants to Company (“Applicants”).

“**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 Applicant.

“Personal information” does not include:

- Information publicly available from government records or made publicly available by you or with your permission;
- Deidentified or aggregated information;
- Information excluded from the CPRA’s scope, such as:
  - protected health information covered by the Health Insurance Portability and Accountability Act (“HIPAA”) or the Health Information Technology for Economic and Clinical Health Act (“HITECH”) or medical information covered by California Confidentiality of Medical Information Act (“CMIA”); or
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), or the California Financial Information Privacy Act (“FIPA”).

## 1) THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect the following categories of personal information. Not all categories may be collected about every Applicant.

- **Identifiers**, for example, real name, nickname, telephone number, postal address, e-mail address, and signature.
- **Professional or Employment-Related Information**, for example, educational institutions attended, degrees and certifications, licenses, work experience and previous employers, and professional memberships and affiliations.
- **Commercial Information**, for example, travel expense records for an interview.
- **Internet Activity Information**, for example, interactions with Company's Internet website, job application, or job advertisement, and publicly available social media activity.
- **Sensory or Surveillance Data**, for example, voicemails and footage from video surveillance cameras.
- **§ 1798.80**: personal information described under Cal. Civ. Code § 1798.80 to the extent not already included in other categories in this section, such as a photograph or health information, for example, to conduct pre-employment physical examinations.
- **Physical Description**, for example, photograph for a security badge or if submitted as part of application materials.
- **Other details**, for example, hobbies and leisure activities or membership in voluntary/charitable/public organizations as stated on the Applicant's resume, for instance.
- **Characteristics of Protected Classifications Under State or Federal Law for Applicants**, collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations, for diversity and inclusion reporting and related purposes.

## 2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

We may collect personal information from the following categories of sources. Not all categories apply to every Applicant.

- **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 Company's electronic resources, for example, to track logins and activity on Company's careers page.
- **Surveillance/recording technologies installed by Company**, for example, video surveillance in common areas of Company 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 Company acquired your employer, Company might collect personal information from that employer.

**Note:** This Privacy Policy does not cover background screening conducted by third-party background check vendors subject to the federal Fair Credit Reporting Act. Company provides a separate disclosure for such screening.

## 3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

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

## **A. Generally Applicable Purposes**

Unless stated otherwise in section 3.B, below, we may use Applicants' personal information for the following purposes:

### **Recruiting, including:**

- To evaluate Applicants' qualifications or suitability for employment with Company
- To communicate with Applicants
- To conduct a pre-employment or criminal history background check
- For identification purposes
- For diversity and inclusion purposes
- To arrange and manage Company-sponsored events
- To create a talent pool for future job openings
- For recordkeeping purposes
- To demonstrate Applicants' agreement to, or acceptance of, documents presented to them, *e.g.*, pre-employment arbitration agreement, acknowledgment of employment application, offer letter
- To evaluate and improve the recruiting process
- To promote Company as a place to work

### **Monitoring, Security, and Compliance, including:**

- To monitor use of Company facilities and information systems
- To conduct internal audits and investigations
- To protect the safety and security of Company's facilities
- To administer Company's compliance hotline
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

### **Conducting Our Business, including:**

- For training purposes or quality assurance with respect to Company employees conducting the interviews or otherwise assisting with the recruiting and hiring process
- For travel and event planning
- To engage in crisis management
- To manage travel reimbursements

### **Miscellaneous Other Purposes:**

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning
- To manage litigation involving Company and other legal disputes and inquiries and to meet legal and regulatory requirements
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Company or any of its subsidiaries or affiliates
- To protect the rights, property, or safety of Company, Applicants, customers or others

## **B. Purposes Specific To Certain Categories Of Personal Information**

We may use the categories of Applicants' personal information listed in this Section 3.B for the purposes stated below:

#### **Purposes For Using Applicants' Health Information:**

- To the extent necessary to comply with Company's legal obligations, such as to accommodate disabilities
- To protect the health and safety of Company's employees and facilities, for example, to take the Applicant's temperature
- For occupational health and safety compliance and recordkeeping
- To respond to an Applicant's medical emergency

**Note:** This Privacy Policy does not cover health information governed by the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act), or California's Confidentiality of Medical Information Act (CMIA) because these laws have their own disclosure requirements.

#### **Purposes For Using Applicants' Protected Categories Of Information:**

- Company collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, the Office of Federal Contracting Compliance Programs (applicable to government contractors), and state laws, and for purposes of diversity analytics.
- Company also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and state law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification. Company collects protected categories of personal information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

#### **4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION**

Company generally maintains personal information related to Applicants as confidential. However, from time to time, Company may have a legitimate business need to disclose Applicants' personal information for one of the purposes listed in Section 3, above, to one or more of the categories of external recipients listed below. In that event, Company discloses your personal information listed in Section 1, above, only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by applicable laws.

- **Your direction:** We may disclose your personal information to third parties at your direction.
- **Service providers and contractors:** Company discloses your personal information to service providers and contractors for the purposes above to assist us in our recruiting efforts and in meeting our business needs and legal obligations.
  - Company only discloses your personal information to service providers and contractors subject to written contracts as required by applicable law.
  - Service providers and contractors include recruiters, law firms, travel agencies, and any other entity providing services to Company.
- **Affiliated companies:** Other companies within the **Galls, LLC** family of companies.
- **Government or administrative agencies:** These may include, for example:
  - Equal Employment Opportunity Commission as required for reporting.
  - State equal employment agencies as required to respond to employment claims and charges.
  - Law enforcement in the event of criminal investigations.
  - Occupational Safety and Health Administration as required for reporting.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.

- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Company, our users, or others.
- **Corporate Transactions:** We may disclose your personal information in connection with a corporate merger, consolidation, bankruptcy, the sale of all, or substantially all, of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

## 5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

If Company hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. Company will retain application information for the entire duration of your employment relationship with Company and for as long thereafter as permitted or required by applicable law. Company makes its document retention schedule available to employees for review.

Company will retain information of applicants who are not hired for at least one year and longer if required by applicable law, such as for four years for California residents. These records will be retained for our internal recordkeeping and reporting purposes, in compliance with state law. During this retention period, we may use your information to consider you for positions in addition to the position(s) for which you initially applied.

## 6) PRIVACY RIGHTS FOR APPLICANTS WHO ARE CALIFORNIA RESIDENTS

This Section 6 applies only to Applicants who are residents of the state of California.

### A. Disclosures for Business Purposes

Company may disclose each of the categories of personal information listed in Section 1, above, to the external recipients listed below for the following “business purposes” as that term is defined under the CPRA.

- **Service providers:** Company may disclose to service providers any of the categories of personal information listed in Section 1, above, for the business purpose of performing services on Company’s behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by Company:** Company may disclose the categories of personal information listed in Section 1, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on the Company’s behalf.
- **Affiliated companies:** Company may disclose any of the categories of personal information listed in Section 1, above, to other companies within the Galls family of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) short-term transient use, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

### B. No sales and no “sharing,” i.e., disclosure for cross-context behavioral advertising

Company does not sell or “share” (disclose for cross-context behavioral advertising) your personal information in connection with the Applicant relationship. In addition, we have no actual knowledge that we sell or share the personal information of individuals of any age in connection with the application process, including the personal information of children under 16.

## C. Your California Privacy Rights

Subject to applicable law, Applicants have the following rights:

- **Right to Know:** You have the right to submit a verifiable request up to twice in a 12-month period for specific pieces of your personal information obtained from you and for information about Company’s collection, use, and disclosure of your personal information.

**Please note** that the CPRA’s right to obtain “specific pieces” does not grant a right to the whole of any document that contains personal information but only to discrete items of personal information. Moreover, Applicants have a right to know categories of sources of personal information and categories of third parties to which personal information is disclosed but not the individual sources or third parties.

- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to Company.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by Company, taking into account the nature of the personal information and the purposes of processing the personal information.

**Note on inferring characteristics:** Company does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about California residents.

**Note on Deidentified Information:** At times, Company may convert personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual (“Deidentified Information”). Company maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that Company may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual.

## D. How to Exercise Your Rights

Company will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call Company’s Toll-Free Hotline: 833-896-0007
- Smartsheet Process: <https://app.smartsheet.com/b/form/c7ead225398d46d7866b6fa21b1c73f2>

## E. How We Will Verify Your Request

The processes that we follow to verify your identity when you make a request to know, correct, or delete are described below. The relevant process depends on how and why the request is submitted.

The verification process that we follow will depend on the nature of your request as described below:

1. **Requests To Know Categories or Purposes:** If you request to know how we collect and handle your personal information, we will match at least two data points that you provide with your request, or in response to your verification request, against information about you that we already have in our records and that we have determined to be reliable for purposes of verifying your identity. Examples of relevant data points include your mobile phone number, your zip code, and the month and year you submitted a job application to us.

- 2. Requests To Know Specific Pieces of Personal Information:** We will match at least three data points that you provide with your request to know, or in response to our request for verification information, against information that we already have about you in our records and that we have determined to be reliable for purposes of verifying your identity. In addition, we may require you to sign a declaration under penalty of perjury that you are the individual whose personal information is the subject of the request.
- 3. Requests To Correct or Delete Personal Information:** Our process for verifying your identity will depend on the risk level (as determined by Company) associated with the personal information that you ask us to correct or delete. For low risk personal information, we will require a match of two data points as described in Section 1 above. For higher risk personal information, we will require a match of three data points and a signed declaration as described in Section 2 above.

We have implemented the following additional procedures when verifying the identity of requestors:

- If we cannot verify your identity based on the processes described above, we may ask you for additional verification information. If we do so, we will not use that information for any purpose other than verification.
- If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

#### **F. Authorized Agents**

You may designate an authorized agent to exercise your right to know, to correct, or to delete. If an authorized agent submits a request on your behalf, the authorized agent must submit with the request either (a) a power of attorney, signed by you, that is valid under California law; or (b) another document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity. This provision does not apply if you have provided a power of attorney compliant with the California Probate Code.

#### **G. Company's Non-Discrimination and Non-Retaliation Policy**

Galls, LLC will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the California Privacy Rights Act.

### **7) CHANGES TO THIS PRIVACY POLICY**

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

#### **For More Information**

For questions or concerns about Company's privacy policies and practices, please contact us at [humanresource@galls.com](mailto:humanresource@galls.com).