

## CCPA WORKFORCE OR PROSPECTIVE TEAM MEMBERS PRIVACY NOTICE – CALIFORNIA RESIDENTS

**Effective date:** January 1, 2020

**Last reviewed on:** December 31, 2019

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy of DEFENDERS, Inc. d/b/a Protect Your Home (collectively, “we,” “us,” or “our”) and applies solely to residents of the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Pursuant to the CCPA, we have an obligation to inform the consumer as to the categories of personal information we collect from a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of our business (collectively, “Workforce or Prospective Team Members”), including emergency contact information and personal information that is necessary to retain and administer any applicable benefits.

### Personal Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information marked “YES” from consumers within the last twelve (12) months:

Category	Examples	Collected	Business or Commercial Purpose of Collection
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	Employment Relationship; Performing Services
B. Personal information described in the California Customer Records statute (Cal. Civil	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number,	YES	Employment Relationship; Performing Services

Code §1798.80(e)	<p>education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p><b>Note:</b> Personal information included in this category (1) does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records, and (2) may overlap with other categories.</p>		
C. Characteristics of protected classifications under California or federal law	<p>Race, color, religion (includes religious dress and grooming practices), sex/gender (includes pregnancy, childbirth, breastfeeding and/ or related medical conditions), gender identity, gender expression, sexual orientation, marital status, medical condition (genetic characteristics, cancer or a record or history of cancer), military or veteran status, national origin (includes language use and possession of a driver's license issued to persons unable to provide their presence in the United State is authorized under federal law), ancestry, disability (mental and physical including HIV/AIDS, cancer, and genetic characteristics), genetic information, request for family care leave, request for leave for an employee's own serious health condition, request for Pregnancy Disability Leave, retaliation for reporting patient abuse in tax-supported institutions, age (over 40)</p>	YES	Employment Relationship; Performing Services
D. Commercial information	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or</p>	YES	Employment Relationship; Performing Services

	tendencies.		
E. Biometric information	Physiological, biological, or behavioral characteristics, including deoxyribonucleic acid (DNA), which can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	YES	Employment Relationship; Performing Services
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	Employment Relationship; Auditing Interactions with Consumers; Security; Performing Services
G. Geolocation data	Finding, determining and providing the exact physical location and/or movement of a computer, networking device or equipment.	YES	Employment Relationship; Performing Services
H. Audio, electronic, visual, thermal, olfactory, or similar information	Information captured from video, audio, systems, and other forms of monitoring or surveillance.	YES	Employment Relationship; Auditing Interactions with Consumers; Security; Performing Services
I. Professional or employment-related information	Job applications, resumes, background checks, drug tests, salary history or performance evaluations.	YES	Employment Relationship; Performing Services
J. Education information that is not publicly	Education records directly related to a student maintained by an educational institution or party acting	YES	Employment Relationship

available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.		
K. Inferences drawn from any other category of personal information	Deriving information, data, assumptions, or conclusions from facts, evidence, or another source of information or data to create a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	Employment Relationship; Performing Services

Personal information does not include:

- Publicly available information, which for purposes of the CCPA:
  - means information that is lawfully made available from federal, state or local government records.
  - does **not** mean biometric information collected by a business about a consumer without the consumer's knowledge.
  - does **not** include data used for a purpose that is not compatible with the purpose for which the data is maintained and made available in the government records or for which it is publicly maintained.
  - does **not** include consumer information that is de-identified or aggregate consumer information.
- Information excluded from the CCPA's scope, like:
  - Medical information governed by the California Confidentiality of Medical Information Act (CMIA); protected health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH); and information collected as part of a clinical trial subject to the Federal Policy for the Protection of Human Subjects.
  - Personal information covered by certain sector-specific privacy laws, including the federal Fair Credit Reporting Act (FCRA), the federal Gramm-Leach-Bliley Act

(GLBA), the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994 (DPPA).

### How we Collect Personal Information

We obtain the personal information listed above from the following sources:

- Directly from our Workforce or Prospective Team Members. For example, from accepting applications, processing payroll and administering and maintaining group health insurance benefits, 401(k) and/or retirement plans.
- Indirectly from our Workforce or Prospective Team Members. For example, through logging into and accessing to company systems and applications, including the intranet and internet.
- From service providers who support the employment relationship. For example, from conducting background checks and other pre-employment screening and hiring activities.

### Use of Personal Information

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

- Maintaining and servicing accounts.
- Providing customer service.
- Processing or fulfilling orders and transactions.
- Verifying customer information.
- Processing payments.
- Assessing eligibility for financing.
- Providing advertising and marketing services.
- Providing analytic services.
- Providing other services on behalf of our business or a service provider, such as billing and collections.
- Other operational purposes described to you when we collect your personal information or as otherwise set forth in the CCPA, such as:
  - Recruiting. We may collect personal information from Prospective Team Members when they submit resumes, application forms and letters, and related materials to us for consideration. We may also collect personal information about Prospective Team Members from third-party sources, such as the applicant's references or a vendor providing background check services.
  - Pre-Employment Screening and Hiring Process. We may collect personal information from Prospective Team Members during the hiring process that we use to employ the applicants. We may participate in pre-employment screenings that involve the collection of sensitive personal information, such as criminal histories or health-related information (where authorized by local law).
  - Time & Attendance. We may use the personal information of hourly paid Team Members for administrative purposes related to tracking their time and attendance.

- Payroll and Benefits. We may use personal information to administer the salaries and benefits due to Team Members, including any annual merit increases, other salary adjustments, annual bonus payments, pension management, income tax and other tax withholdings, and life, health, disability insurance benefits, wellness exam information (where authorized by local law).
- Legal Obligations. We may also use personal information, including sensitive personal information, to comply with legal obligations, such as cooperation with courts (including civil actions) and law enforcement agencies in legal investigations regarding suspected criminal activities or other suspected illegal activities, to protect our legal rights or support any claim, defense, or declaration in a case or before any jurisdictional and/or administrative authority, arbitration, or mediation panel, and in the context of disciplinary actions/investigations or of internal or external audits and inquiries. We may also process Team Members' health information (such as absence records associated with illness or accidents, maternity leave, disabilities, exposures, or work-related injuries or claims) to the extent we are required to do so in order to comply with legal obligations or to manage workplace safety.
- Equipment & Usage Assignment. We may use personal information to assign workspaces, offices, computers, mobile devices, telephones, printers, copiers, and other equipment to Team Members and to keep track of the Team Members to whom these items are assigned. We may also use personal information to assign, track, and audit Team Members' user rights in our databases and information systems. For example, we may monitor Team Members' access to our systems to verify that they are only accessing information that they need to perform their job responsibilities.
- Performance Management. We may use personal information to facilitate the performance management and career development of Team Members, such as through annual performance appraisals, annual salary reviews, and, as necessary, disciplinary sanctions in accordance with local applicable law.
- Employee Monitoring. We may monitor Team Members' activities as necessary to achieve a business or commercial purpose or comply with our legal obligations. Monitoring activities could include, monitoring the content of electronic communications, internet activities and email traffic, video surveillance of premises, auditing Team Members' access of information systems, video surveillance and monitoring facility access.
- General Management & Administration. We may use personal information for our planning and budgeting, headcount, financial reporting, corporate reorganizations, outsourcing, restructuring, acquisitions, divestments, and compliance with regulatory reporting requirements. We may also use personal information for human resources administration, such as obtaining feedback from Team Members through surveys or to identify areas for improvement.

We will also use your personal information where reasonably necessary and proportionate to achieve the operational purpose for which that personal information was collected or processed, or for another operational purpose that is compatible with the context in which your personal information was collected.

We will not collect additional categories of personal information or use the personal information we collect for additional purposes without providing you with appropriate notice.

### Sharing Personal Information

We may disclose your personal information for a business purpose.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: Personal information described in the California Customer Records statute (Cal. Civil Code §1798.80(e))
- Category C: Characteristics of protected classifications under California or federal law
- Category D: Commercial information
- Category E: Biometric information
- Category F: Internet or other electronic network activity information
- Category G: Geolocation data
- Category H: Audio, electronic, visual, thermal, olfactory, or similar information
- Category I: Professional or employment-related information
- Category J: Education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
- Category K: Inferences drawn from any other category of personal information

We disclose your personal information for a business purpose to the following categories of other businesses or third parties:

- Our affiliates.
- Service providers.
- ADT and entities that may engage in marketing activities based on your preferences.
- Third parties to whom you authorize us to disclose your personal information in connection with the products or services we provide to you.

### Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice (which will be updated at least every 12 months), we will notify you through a notice on our website's homepage:

<https://www.protectyourhome.com/CaliforniaPrivacy>

### Contact Information

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (888) 905-0314

Website: <https://www.protectyourhome.com/CaliforniaPrivacy>

Email: [ccpaquestion@homedefenders.com](mailto:ccpaquestion@homedefenders.com)

Postal Address: DEFENDERS, Inc. d/b/a Protect Your Home  
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