

California Employee Privacy Notice

Effective Date: May 1, 2022

The California Consumer Privacy Act of 2018 (**CCPA**) imposes specific obligations on business processing personal information of California residents, including its employees. Management Controls, Inc. and its affiliates (**MCi, we, or us**) provides this California Employee Privacy Notice (this **Notice**) to you to identify the categories of personal information that may be collected and why MCi collects such information, as required by the CCPA.

This Notice applies only to individuals residing in the State of California who are considered **Consumers** (as defined in the CCPA) – job applicants, employees, and contractors of MCi – from whom we collect Personal Information (as defined in the CCPA).

Updates

This Notice will be updated at least once every twelve (12) months to reflect changes in our business, legal, or regulatory obligations. MCi will not collect additional categories of your personal information or use your personal information already collected for additional purposes without providing you with a notice of our intent to do so. Any changes to this Notice will be effective from the date they are communicated to you. If we make any material changes to this Notice, we will notify you by email before such changes are effective at your MCi email address.

Definitions

Personal Information has the meaning as defined in the CCPA, and includes information that is collected by MCi about you in the course of your employment with MCi for employment-related purposes. This encompasses any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you.

Process, processed, or processing means any operation or set of operations which is performed on personal information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction of personal information.

Employee, employees, or you means an identified or identifiable natural person who is a California resident and who is acting as an MCi job applicant, employee, or contractor. In this context, job applicant refers to any person who has submitted his or her candidacy with MCi; employee refers to any person who is employed at MCi as a full- or part-time employee or temporary worker, and contractor means a natural person who provides any service to MCi or its affiliates pursuant to a written contract.

Personal Information MCi Collects about You

We may collect Personal Information from or about you in a variety of different situations, including, but not limited to, on our website, your mobile device, through email, in physical locations, through the mail and/or over the telephone. Listed below are the categories of personal information that MCi may collect and/or process about you:

Category	Examples of Personal Data Collected
Identifiers	Real name, alias, postal address, telephone number, mobile device ID, email address, Social Security number, driver's license or state identification card number, passport number, or other similar identifiers. In this context, a unique personal identifier means a persistent identifier that can be used to recognize an employee, or a device that is linked to an employee, over time and across different services, including, but not limited to, a device identifier; an Internet Protocol (IP) address; cookies, beacons, pixel tags, or similar technology.
Personal information categories listed in the California Consumer Records Statute	A name, signature, Social Security number, postal address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, medical information, or health insurance information.
Characteristics of Protected Classifications under California or Federal Law	Age, race, citizenship, national origin, marital status, medical conditions, physical or mental disabilities, request for family care leave, request for leave for an employee's own serious health condition, request for pregnancy disability leave, veteran or military status, genetic information, religion (includes religious dress and/or grooming practices), sex/gender (includes pregnancy, childbirth, breastfeed, and/or related medical conditions), gender identity, gender expression, sexual orientation.
Internet or other Electronic Network Activity	browsing history, search history, application access location, and information regarding a Consumer's interaction with an internet website, application, or advertisement, time and geolocation data related to use of an internet website, application or physical access to an MCI office location.
Professional or Employment-Related Information	Job related data, maintained as part of the employment relationship that is present in: a job application or resume; an employment contract; a contractor agreement; a performance review; a disciplinary record; photos; information from employee expenses; browsing and search history; payroll and benefits related data; internal and external contact information.
Geolocation data	Physical location or movements.
Sensory Data	Electronic, audio, and visual information, including information captured from video, audio, systems, or other forms of monitoring or surveillance.
Education Information	Information about an employee's education background, such as education records, report cards, and transcripts that are not publicly available.
Inferences	Information drawn from any of the personal information categories referenced above to create a profile about an employee reflecting the employee's characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal Information does *not* include deidentified or aggregate Consumer information or publicly available information from government records.

MCI obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or services we provide you.
- Indirectly from you. For example, from observing your actions on our website or intranet or from information your computer or mobile device transmits when interacting with our website, intranet, or mobile applications.
- Third parties. For example, recruiters who submit your information to us for an employment position, or third party vendors and consumer reporting agencies for employment background checks and drug screens.

Purposes for Collecting Your Personal Data

MCI collects the personal identified above for one or more of the purposes listed below.

- To meet the purpose for which you provided the information, such as, if you share your name and contact information to apply for a job, we will use that Personal Information in connection with your employment or employment application.
- To contact you, including to inform you about information relating to your employment or employment application.
- To recruit employees, including to conduct employment related background and drug screenings and checks.
- To administer benefits, such as to maintain group health insurance benefits (medical, dental, vision, and retirement benefits), including recording and processing eligibility of dependents, absence and leave monitoring, and insurance and accident management.
- To pay and reimburse for expenses, including salary administration, payroll management, management of expenses, to administer other compensation related payments, including assigning amounts of commissions or bonus payments to individuals, and administration of equity grant payments.
- To conduct performance-related reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions, and staff re-structuring.
- To monitor work-related licenses and credentials, including provisioning software license for use in the course of an employee's work related responsibilities, ensuring compliance, training, examination, and other requirements are met with applicable regulatory bodies.
- To provide our employees with human resources management services, including hiring, conducting background checks, drug screenings, onboarding new employees, managing and maintaining employer-employee relations, managing relations with independent contractors, providing employee training and development, internal research, providing employee data maintenance and support services administration of separation of employment, approvals and authorization procedures, administration and handling of employee claims, travel and reimbursement administration, and other functions related to employment or potential employment with MCI.
- To maintain your Personal Information, including securing and altering your details across several relevant entities within the MCI group of companies (if applicable, for example transferring roles or a change in dependents).
- To assist you in case of emergency, including maintenance of contact details for you and your dependents in case of personal or business emergency.

- To monitor eligibility to work in the US, which means monitoring and ensuring compliance of employees' ability to work in the US.
- To conduct healthcare-related services, including operation of sickness policies and procedures.
- To facilitate a better working environment, which includes conducting staff surveys, providing senior management information about other employees, and conducting training.
- To ensure a safe and efficient working environment, which includes MCI disciplinary actions and code of conduct processes and investigations.
- To maintain security on MCI websites and Internet connected assets, which includes hosting and maintenance of computer systems and infrastructure; management of MCI's software and hardware computer assets; systems testing; training; and monitoring email and Internet access.
- For research, analysis, and business development, including to develop or improve our business processes, employment practices, website, products, and services.
- To comply with applicable law or regulatory requirements, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic, and Health, Safety, Security, and Environment reporting.
- To evaluate or conduct a merger or corporate reorganization, including divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of MCI's assets, whether as a going concern or as part of a transaction in which Personal Information held by MCI is among the assets transferred.

Further Information

If you have any questions about this statement, please contact the MCI Data Protection Officer at privacy@mccorp.com or at 15600 John F Kennedy Blvd #850, Houston, TX 77032, Attn: Data Protection Officer.

Please refer to **California Employee Privacy Notice** in your message.