# **PRIVACY POLICY – ACTION TEAM MEMBERS**

## Last updated July 24, 2020

The California Consumer Privacy Act (CCPA) provides job applicants and employees the right to know the categories of personal information their employer collects from them and how such personal information is used. Action Property Management, Inc. ("Company," "we," "us," "our") is committed to protecting your personal information and your right to privacy. This Privacy Policy is designed to notify you of our information gathering and dissemination practices during the application process and your potential or actual employment with the Company. In the course of our business, we ask job applicants, prospective employees, and current employees to provide personal information relating to employment or prospective employment. This Privacy Policy describes how we collect and use your personal information, the categories of personal information we collect, and instances where we may disclose your personal information to third parties. We will only collect and process your personal information in accordance with this Privacy Policy, unless otherwise permitted by applicable law.

### CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

We collect personal information that you voluntarily provide to us when you become an employee, express an interest in becoming an employee, when you submit your job application, and when you participate in activities as an employee (such as creating an account). In some cases, we may obtain a background check and consumer report from a consumer reporting agency once a conditional offer of employment is made.

Categories of Personal	Examples of Personal	How Personal Information is Used
Information	Information	
Personal Identifiers	Your first and last name, your address, your email address, telephone number, date of birth, social security number, driver license number, passport number, and/or other government identification numbers, immigration and work authorization status, your physical characteristics or description, signature, IP address, and account name.	To make an employment and/or job- related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment at the Company, to manage your employment relationship with the Company and perform human resource administration (including employee payroll and benefit administration), to comply with legal regulations, and to communicate directly with you.
Protected classification and diversity information	Your age, 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 conditions), sexual orientation,	To process any requests for workplace accommodations, if necessary, and to comply with local, state, and federal laws and regulations.

We collect the following categories of your personal information:

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	genetic information, and veteran or military status.	
Physical characteristics or personal description	Information obtained through the collection of government- issued identification, identification photographs and through your appearance on security camera footage filmed throughout the workplace.	To verify employee work authorization status, monitor work productivity, ensure compliance with workplace policies, and to maintain a safe, secure, and healthy work environment.
Biometric information	Your 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, or other physical patterns or health data.	To ensure compliance with workplace policies and maintain a safe, secure, and healthy work environment.
Internet or network activity information	Your browsing history, search history, email information, and account names.	To communicate with you and send you company communications; to verify that job requirements are met, and to monitor productivity and ensure compliance with workplace policies.
Health Insurance and benefit information	Your benefit selections, social security number or other government identification number, date of birth, health insurance information, and policy number.	To administer benefit claims, administer workers' compensation programs, and for employee-related human resource administration.
Health and safety information	Your health conditions, if relevant to workplace safety or your employment status, job restrictions, workplace accident and illness information, drug screening information, and health insurance policy information.	To maintain a safe and healthy workplace, assess your working capacity and make necessary accommodations, process leave requests, administer health and worker's compensation programs, and comply with applicable laws.
Emergency contact information of persons designated as emergency contacts	Name and contact information of your emergency contact(s) and their relationship to you.	To maintain contact information should an emergency involving you arise during your employment.
Audio or visual Information	Photographs, video recordings, and government-issued identification.	To monitor the workplace and maintain a safe, secure, and healthy workplace.
Professional or employment information	Your current or past employment history, employee status and title, job evaluations, work schedule, job assignments, hours worked, training and developing information,	To make an employment and/or job- related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment with the Company, to assess

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	performance evaluation	, , , , , , , , , , , , , , , , , , , ,
	information, disciplinary a	d task, to conduct performance reviews and
	counseling information, ar	d determine performance requirements,
	termination information.	for education, training, and development
		requirements, to gather evidence for
		disciplinary action or termination, to
		facilitate account creation and the log-on
		process, to provide measurement,
		analytics, and other business services,
		and improving our Products.
Education information	Your educational history.	To evaluate and make an employment
	,	and/or job-related decision that involves
		you, to provide you with employment, to
		assess qualifications for a particular job or
		task, conduct performance reviews and
		determine performance requirements,
		and for education, training, and
		development requirements.
Financial information	Your banking information, t	· · ·
	elections, pay rate, and payre	
	deduction information.	
		administration, to facilitate transactions
		and other business services, and all
		related accounting and auditing.

We will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without first providing you with additional and/or updated notice.

### DISCLOSURE TO THIRD PARTIES

We do not sell or otherwise disclose your personal information to any third parties for any monetary consideration. We only share your personal information with service providers to the extent necessary to administer employee benefits, including for payment of wages, tax processing, health insurance, and in connection with our human resource activities. Data related to paychecks will be stored with our payroll service provider. We may also share your personal information when necessary to comply with federal, state, or local laws, and to cooperate with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities.

### UPDATING YOUR PERSONAL INFORMATION

All personal information that you provide to us must be true, complete and accurate. If your personal information happens to change during the course of your employment, please keeps us informed of such changes.

### SECURITY OF YOUR INFORMATION

We have implemented appropriate technical and organizational security measures designed to protect the security of your personal information.

#### CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this privacy policy at any time and will provide you with a new Privacy Policy when and if any updates are made. The updated version will be indicated by an updated 'Revised" date and the updated version will be effective as soon as it is distributed. If we would like to use your previously collected personal data for a different purpose than the purposes disclosed at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent only when permitted by applicable law or regulation.

#### CONTACT INFORMATION

If you have questions or comments about this policy, you may email the Director of Human Resources (Paul Firth) at <u>pfirth@actionlife.com</u>, or mail correspondence to:

Paul Firth, Director of Human Resources

c/o Action Property Management, Inc.

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