

CPRA PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES

This PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES of JE Dunn Construction Company (“JED,” “we,” “us,” or “our”) applies solely to current, former and prospective employees who reside in the State of California (“employees” or “you”). We adopt this notice to comply with the California Privacy Rights Act (“CPRA”) and other California privacy laws. Any terms defined in the CPRA have the same meaning when used in this notice.

Employee CPRA Rights

Under California law our California employees have the following rights:

- The right to receive disclosure about our Information Collection Practices. This disclosure is provided below.
- The right to receive disclosure about our Information Disclosure Practices. This disclosure is provided below.
- The right to tell us not to sell your personal information. JED does not sell your personal information.
- The right to tell us not to share your personal information for behavioral or cross-context marketing purposes. JED does not share your personal information for this purpose.
- The right to tell us not to process your Sensitive Personal Information for purposes other than the purposes for which it was originally collected. JED only processes Sensitive Personal Information for the purpose for which it was originally collected.
- The right to request that we correct information that is incorrect. Please see below for how to exercise this right.
- The right to request a copy of Personal Information we collected about you during the past 12 months or, at your option, since January 1, 2022, subject to certain exceptions. Please see below for how to exercise this right.
- The right to request that we delete Personal Information subject to certain exceptions. Please see below for how to exercise this right.

Personal 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 or device (“personal information”). We collect and use personal information for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance. Below are the categories of personal information we collect about employees:

Category	Examples	Collected from employee/applicants
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories Protected under the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, medical information. Some personal information included in this category may overlap with other categories.	YES
C. Protected anti-discrimination classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex	YES

	(including gender, pregnancy or childbirth and related medical conditions), veteran or military status.	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	NOT COLLECTED	NO
F. Internet or other similar network activity.	Browsing history, search history, information on your interaction with company systems, websites, applications, etc.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	NOT COLLECTED	NO
K. Sensitive Personal Information	Social Security, driver's license, state identification card, or passport number, account log-in in combination with any required security or access code, password, or credentials allowing access to an account, racial or ethnic origin.	YES
L. Inferences drawn from other personal information.	NOT COLLECTED	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated employee information.

Information Collection Practices: How We Collect and Use Personal Information of Employees

JED collects the above categories of Personal Information directly from employees; and some from third parties such as staffing partners and employment application references.

We use Personal Information to:

- Comply with all applicable laws and regulations.
- Recruit and evaluate job applicants and candidates for employment based on skills and experience
- Conduct background checks.
- Manage your employment relationship with us, including for:
 - onboarding processes;
 - timekeeping, payroll, and expense report administration;
 - employee benefits administration;

- employee training and development requirements;
- the creation, maintenance, and security of your online employee accounts;
- reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
- workers' compensation claims management;
- employee job performance, including goals and performance reviews, promotions, discipline, and termination;
- other human resources purposes;
- Manage and monitor employee access to company facilities, equipment, and systems.
- Conduct internal audits and workplace investigations.
- Investigate and enforce compliance with and potential breaches of Company policies and procedures.
- Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company.
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking.
- For client marketing purposes.
- Administer and maintain the Company's operations, including for safety purposes.
- Exercise or defend the legal rights of the Company and its employees, affiliates, customers, contractors, and agents.
- We use and process Sensitive Personal Information to comply with laws including anti-discrimination laws and disability accommodation laws.

Employee Information Disclosure Practices

JED may disclose Personal Information of employees for a business purpose to service providers or contractors who assist us in administering our workforce including benefits providers; payroll and expense administrators; worker's compensation vendors and government agencies; professional advisors such as attorneys, auditors and accountants; and, where appropriate, law enforcement or government regulators.

We do NOT sell employee Personal Information.

We do NOT share employee Personal Information with third parties for behavioral or cross-context marketing purposes.

Processing Employees Sensitive Personal Information

We do NOT process Sensitive Personal Information for purposes other than the purpose for which it was originally collected.

How to request correction of your information

If you believe that information that we hold about you is incorrect or needs to be updated, please contact ethics@jedunn.com or call 866-742-5234. You can make this request at any time. We will acknowledge receipt of your request within 10 business days and we will correct your information promptly (and at least within 45 days) after verifying your request.

How to request a copy of your information

If you would like to receive a copy of the information collected about you during the past 12 months (or at your option, since January 1, 2022) please contact ethics@jedunn.com or call 866-742-5234. Certain information will not be released to you because of legal restrictions or because the information is used for security purposes. You may make this request up to twice in any calendar year. We will acknowledge receipt of your request within 10 business days and provide a copy of your information in an easily readable format within 45 days. If we need an additional 45 days to compile your information we will let you know.

How to request deletion of your information

If you would like for us to delete information that we are permitted by law to delete, please contact ethics@jedunn.com or call 866-742-5234. We are not permitted to delete information that we need in order to operate our business, administer our employees, protect our legal obligations and rights, or to provide security for our employees, our systems and our company. You may make this request up to twice in any calendar year. We will

acknowledge receipt of your request within 10 business days and honor your request within 45 days. If we need an additional 45 days to respond we will let you know.

Data Storage and Security

We will use a reasonable standard of care to store and protect your Personal Information. We use appropriate physical, technical and organizational security measures and procedures to protect Personal Information from unauthorized use, loss, alteration, destruction or modification. We will retain your Personal Information until the initial purpose for collecting and retaining such data has been satisfied. If you subsequently agree to a new or additional purpose, your PI may be retained for that.

Non-Discrimination

We will not discriminate against you as a result of your exercise of any of these rights.

Questions

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact ethics@jedunn.com or call 866-742-5234.

Changes to This Notice

We reserve the right to amend this Notice at our discretion at any time. When we make changes to this Notice, we will post the updated notice on our website and update the Notice's effective date.

Effective Date: January 1, 2023