

# Applicant Privacy Notice

Last Updated: **February 29, 2024**

**Collins Pine Company, Inc.** and its subsidiaries and affiliated companies ("**Company**") takes your privacy seriously. We want you to know how we collect, use, and disclose, your personal information.

## EEO Statement

Company is an equal employment opportunity employer. Company's policy is not to unlawfully discriminate against any applicant or employee on the basis of race, color, sex, religion, national origin, age, disability, or any other consideration made unlawful by applicable federal, state, or local laws. Company also prohibits harassment of applicants and employees based on any protected category, characteristic or status. It is also Company's policy to comply with all applicable state, federal and local laws respecting consideration of unemployment status in making hiring decisions.

Company complies with the ADA, the ADAAA and applicable state law and considers reasonable accommodation measures that may be necessary for qualified applicants/employees to perform the essential functions of the job. Hire may be contingent upon a post-offer medical examination, and to skill and agility tests, as appropriate for the position.

## California Notice at Collection for California Residents

Company collects 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.

## This 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.

## 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, and e-mail address.
- **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.
- **Other details**, for example, hobbies and leisure activities or membership in voluntary/charitable/public organizations, for example, as stated on the Applicant’s resume.

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

We 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.

**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 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

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

- 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
- 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; and
- 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
- For occupational health and safety compliance and record-keeping
- 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.

## **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 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.
  - Service providers and contractors include recruiters, law firms, travel agencies, and any other entity providing services to Company.
- **Government or administrative agencies:** These may include, for example the
  - 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.
- **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, Applicants, or others.

## 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. 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) ADDITIONAL INFORMATION FOR APPLICANTS WHO ARE CALIFORNIA RESIDENTS

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

### A. Additional Information Regarding Disclosures of Personal Information

The California Privacy Rights Act (CPRA) requires that we provide you with the following information about sales and “sharing” and disclosures of your personal information to third parties for “business purposes”, as those terms are defined in 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.

### No sales or sharing

Company does not sell or “share” (disclose for cross-context behavioral advertising) your personal information in connection with the HR 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 HR relationship, including the personal information of children under 16.

### B. 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 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 external recipients to which personal information is disclosed, but not the individual sources or recipients.
- **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.

**Right to Opt Out of Sale and Sharing:** You have the right to opt out of the sale of your personal information and the disclosure of your personal information for cross-context advertising. You may also implement a browser setting or extension to communicate your selling and sharing preferences automatically to the websites you visit.

**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 converts 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.

#### **C. 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 **(800) 329-1219**
- Email **CAPrivacyRightsRequests@collinsco.com**

#### **D. How We Will Verify Your Request:**

Company will match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

#### **E. 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 a 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. You can obtain our “Authorized Agent Designation” form by contacting us at **CAPrivacyRightsRequests@collinsco.com**.

In the alternative, you can provide a power of attorney compliant with the California Probate Code.

#### **F. Company’s Non-Discrimination and Non-Retaliation Policy**

Company 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 **CAPrivacyRightsRequests@collinsco.com**.

My signature below certifies I have received the Collins California Privacy Rights Act Applicant Notice and Privacy Policy.

Printed Name:

Signature:

Date:

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