

**Brennan Industries Privacy Notice for California Employees and Consumers**  
**Effective Date: January 1, 2021**

Brennan Industries, Inc. and its affiliates and subsidiaries (“Brennan,” “we,” “us,” or “our”) provide this Privacy Notice for California Employees and Consumers (this “CCPA Employee Privacy Notice”) to supplement the information contained in the Brennan Industries Privacy Policy. This CCPA Employee Privacy Notice sets forth our privacy practices as required by the California Consumer Privacy Act of 2018 (as modified by the California Privacy Rights Act, the “CCPA”).

This CCPA Employee Privacy Notice applies only to individuals residing in the State of California who constitute “consumers” under the CCPA and from whom we collect “personal information” and/or “sensitive personal information” as such terms are used in the CCPA. We provide you this notice because, as a California resident who is a full or part-time employee or contractor, or as an applicant for employment, you qualify as a consumer for purposes of the CCPA.

**Information We Collect**

We may collect personal information and/or sensitive personal information from you in a variety of different situations, including but not limited to via our website, a website operated by a service provider we have engaged to assist us with (among other things) collecting information, web portals for employment inquiries and applications, your mobile device, email, in person or at physical locations, the mail, over the telephone and/or text or other messaging mediums.

The following table identifies the (A) categories of personal information and/or sensitive personal information we may collect from California employees, contractors, potential employees and other consumers, (B) principal means or methods by which we collect such information, and (C) business purpose(s) we seek to serve by collecting such information:

	<b>(A) Categories</b>	<b>(B) How Collected</b>	<b>(C) Business Purpose(s)</b>
<b>Identifiers</b>	Examples: legal 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.	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	Legal and regulatory compliance; Payroll, insurance and other administrative purposes; Marketing; Processing and managing interactions and transactions; Screening applicants; Performing services; Research and development; Quality assurance; Security; Health and safety; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Personal Records</b>	Examples: physical characteristics or description, signature, telephone number, education, employment, employment history, insurance	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data,	Legal and regulatory compliance; Payroll, insurance and other administrative purposes; Marketing; Processing and managing interactions and transactions; Screening applicants; Performing services; Research and development; Quality assurance;

	policy number, bank account number, credit card number, debit card number, other financial information, medical information, health insurance information, or emergency contact details.	from publicly-available government data, or from consumer reporting agencies.	Security; Health and safety; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Consumer Characteristics</b>	Examples: age, sex, marital status, religion, veteran status, familial status, disability, gender identity, or citizenship status.	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	Legal and regulatory compliance; Payroll, insurance and other administrative purposes; Processing and managing interactions and transactions; Screening applicants; Performing services; Research and development; Quality assurance; Security; Health and safety; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Commercial Information</b>	Examples: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	Marketing; Processing interactions and transactions; Managing interactions and transactions; Performing services; Research and Development; Quality assurance; Security; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Internet Usage Information</b>	Examples: browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement.	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	Marketing; Processing interactions and transactions; Managing interactions and transactions; Performing services; Research and Development; Quality assurance; Security; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Geolocation Information</b>	Examples: your location in person or when engaging in internet or other location reporting activity.	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing	Marketing; Processing interactions and transactions; Managing interactions and transactions; Performing services; Research and Development; Quality assurance; Security; Health and safety; Data

		partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Sensory Data</b>	Examples: audio and visual information.	Any possible means, including but not limited to: Directly from the consumer, or from service providers, including marketing partners.	Legal and regulatory compliance; Payroll, insurance and other administrative purposes; Processing and managing interactions and transactions; Screening applicants; Performing services; Research and development; Quality assurance; Security; Health and safety; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Professional or Employment Information</b>	Examples: professional, educational, or employment-related information	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	Legal and regulatory compliance; Payroll, insurance and other administrative purposes; Processing and managing interactions and transactions; Screening applicants; Performing services; Research and development; Quality assurance; Security; Health and safety; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Non-public Education Information</b>	Examples: education information that is not publicly available	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	Processing interactions and transactions; Managing interactions and transactions; Screening applicants; Performing services; Research and Development; Quality assurance; Security; Data analytics; Auditing related to a current interaction with the consumer and concurrent transactions.
<b>Inferences Drawn from the Foregoing Categories</b>	Examples: any profile, notes, summary, impression or other information derived from personal information.	Any possible means, including but not limited to: Directly from the consumer including through email accounts and online activities, from service providers, including marketing partners, from publicly available non-government data, from publicly-available government data, or from consumer reporting agencies.	Legal and regulatory compliance; Payroll, insurance and other administrative purposes; Marketing; Data Analytics; Business process improvement

Personal information and sensitive personal information do not include (a) publicly available information or (b) deidentified or aggregated consumer information.

### **How We Use Personal Information**

We may use or disclose the personal information and/or sensitive personal information we collect from you or about you for any purpose not prohibited by law, including without limitation any of the following:

- To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job or become an employee, we may use that personal information in connection with your prospective, current or former employment.
- To contact you and to inform you about benefits or information relating to your prospective, current or former employment.
- To provide, support, personalize, and develop our website and services relating to your employment or potential employment.
- To create, maintain, customize, and secure your information, account or records with us.
- To process your requests or transactions and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our systems, website, services, databases and other technology assets, and business.
- For research, analysis, and business development, including to develop and improve our business processes, website, recruiting, hiring and services.
- To comply with applicable law or regulations, or to respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- As described to you when collecting your personal information and/or sensitive personal information or as otherwise set forth in the CCPA or subsequently consented to by you.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Brennan's assets and/or business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information and/or sensitive personal information of consumers held by Brennan is among the assets transferred.

### **How We Share Personal Information**

We may disclose your personal information and/or sensitive personal information to a third party for a business purpose, including to our service providers.

We share your personal information and/or sensitive personal information with the following categories of third parties:

- Service providers.
- Third parties with whom you direct us to share such information.
- Other third parties such as background, investigation and consumer reporting agencies when we perform employee background screenings and other processes not prohibited by law.
- Government authorities to which you request, or we are required by applicable law or regulations, to disclose such information.

### **Disclosures of Personal Information for a Business Purpose**

In the preceding 12 months, Brennan has disclosed all of the categories of personal information and sensitive personal information previously described under **Information We Collect**.

### **Sales of Personal Information**

Brennan does not sell any personal information or sensitive personal information.

### **Your California Privacy Rights**

In addition to the disclosures in this CCPA Employee Privacy Notice, the CCPA provides consumers who are California residents the following rights regarding the personal information and/or sensitive personal information we collect:

- **Access:** California residents have the right to request that Brennan provide access to view and receive a copy of the personal information and/or sensitive personal information we collect about them, which right may be exercised by submitting an opt-out request to [privacy@brennaninc.com](mailto:privacy@brennaninc.com).
- **Correction:** California residents have the right to request that Brennan correct any inaccuracies reflected in the personal information and/or sensitive personal information we collect about them, which right may be exercised by submitting an opt-out request to [privacy@brennaninc.com](mailto:privacy@brennaninc.com).
- **Opt-Out:** Brennan does not sell any personal information or sensitive personal information that we collect. Nevertheless, in the unlikely event we later decide to do so, the CCPA grants to California residents the right to direct us not to sell their personal information and/or sensitive personal information, which right may be exercised by submitting an opt-out request to [privacy@brennaninc.com](mailto:privacy@brennaninc.com).
- **Deletion:** California residents have the right to request that Brennan delete from our records personal information and/or sensitive personal information we collect about them, which right may be exercised by submitting an opt-out request to [privacy@brennaninc.com](mailto:privacy@brennaninc.com). However, we are permitted to retain (i.e., not delete) information collected from our current and former employees and applicants for legal compliance and other purposes consistent with those for which it was collected.
- **Nondiscrimination:** We do not discriminate against California residents because they choose to exercise any of their rights under the CCPA.

Requests submitted to us pursuant to the CCPA will be subject to authentication and verification as permitted or required by the CCPA.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information and/or sensitive personal information to third parties for their direct marketing purposes. We do not disclose your personal information and/or sensitive personal information to third parties for their direct marketing purposes.

### **Privacy Rights for California Minors in the Digital World**

If you are a registered user and under eighteen (18) years old, you can request that we remove content or information that you have posted to our website or other online services. Note that fulfillment of the request may not ensure complete or comprehensive removal (e.g., if the content or information has been shared or reposted by another user). To request removal of content or information, please send an email to [privacy@brennaninc.com](mailto:privacy@brennaninc.com) or write us at:

Brennan Industries, Inc.  
ATTN: General Counsel  
6701 Cochran Road  
Solon, OH 44202

### **Changes to This CCPA Employee Privacy Notice**

Brennan reserves the right to amend this CCPA Employee Privacy Notice any time at our discretion. When we make changes to this CCPA Employee Privacy Notice, we will distribute the updated notice to all then current employees and contractors, all consumers who submitted an active employment application and by posting on our website [www.brennaninc.com]. Your continued employment, contract, application for employment, use of our website or interaction with us through other methods following the posting of changes and/or our directing you to the updated CCPA Employee Privacy Notice constitutes your acknowledgment and acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this CCPA Employee Privacy Notice, the means by which we collect and use your personal information and/or sensitive personal information, your choices and rights regarding such collection and use, or how to exercise your rights under the CCPA, you may contact us at: please do not hesitate to contact us at:

Email: [privacy@brennaninc.com](mailto:privacy@brennaninc.com)

Phone: 440.248.1880

Brennan Industries, Inc.  
ATTN: General Counsel  
6701 Cochran Road  
Solon, OH 44202