

# CHG'S PRIVACY NOTICE AND POLICY FOR CALIFORNIA EMPLOYEES, APPLICANTS, AND CONTRACTORS REGARDING THE COLLECTION OF PERSONAL INFORMATION

**Effective Date:** December 1, 2025

C.H. Guenther & Son, LLC and its U.S. subsidiaries and affiliates (collectively, "Guenther" or the "Company") is committed to protecting the privacy and security of personal information of our current and former employees ("Employees"), applicants, and contractors (together with Employees, "Personnel") and their emergency contacts and beneficiaries.

The Company is committed to complying with the California Consumer Privacy Act ("CCPA") and other California privacy laws. This notice supplements its Privacy Notice to California Employees Regarding the Collection of Personal Information, its California Consumer Privacy Act notice, its California Job Applicant Privacy Notice, and its Privacy Policy. The Company's intention for these notices is to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice. This policy applies to Guenther's employees, former employees, applicants, and contractors in the State of California. This policy does not apply to Guenther's employees, former employees, applicants, or contractors outside the State of California or who are not California residents.

## Information We Collect

We collect the following categories of personal information for the purposes described below:

Category	Examples	Purpose
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.	The Company collects personal identifiers to process job applications; onboard Personnel; enroll and administer benefits; enter into contracts; to comply with internal and external audits, including by customers; and use for general human resources purposes.
Personal information categories listed in 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, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	The Company collects this information to process job applications; onboard Personnel; enroll and administer benefits; enter into contracts; to comply with internal and external audits, including by customers; and use for general human resources purposes. The Company collects pay information, including pay rate, payroll deduction information, banking information for direct deposit, and credit card information for expense reimbursement, to pay its Personnel and comply with applicable laws.
Protected classification characteristics under California or federal law.	Age (40 years or older), 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 medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	The Company collects equality and diversity information, such as minority, veteran, and disability status, through voluntary self-disclosure and other means to implement the Company's diversity programs and to comply with applicable laws. The Company collects health and safety information to maintain a safe workplace; assess working capacity;

		administer health and Workers' Compensation insurance programs; to comply with internal and external audits, including by customers; and comply with applicable laws. The Company also collects information necessary for benefits enrollment and administration purposes.
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	If you are a contractor, we may collect commercial information from or about you in connection with obtaining services from you.
Biometric information.	Genetic, 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, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	The Company collects biometric data, such as fingerprints if required by laws and for background check purposes; fingerprints or other biometric information for secure access purposes. Sleep, health, or exercise data in connection with Company wellness programs. The Company collects this information to ensure that Personnel properly log-in to Company equipment and ensure that authorized Personnel have access to secured locations of the Company.
Internet or other similar network activity.	Email, computer, internet, telephone, and mobile device usage; IP address, log-in information, and location information; Browsing history, search history, or information regarding your interaction with a website, application or advertisement.	The Company collects this information to protect Company, customer, and Personnel property, equipment and confidential information; monitor Personnel performance; and enforce the Company's electronic communications acceptable use policies.
Geolocation data.	Physical location or movements.	The Company may collect geolocation data for general human resources purposes.
Sensory data.	Audio, electronic, visual, or similar information.	The Company may track audio and visual information of Personnel through photographs used for identification purposes and to promote the Company. The Company collects audio and video recordings of training sessions.
Professional or employment-related information.	Current or past job history, performance evaluations, performance management information, such as employment status (full-time or part-time, regular or temporary), work schedule, job assignments, hours worked, accomplishments and awards; training and development information; discipline and counseling information; and employment termination information.	The Company collects professional and employment-related information to manage its relationship with Personnel.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	The Company collects education information in connection with the job promotion process; to evaluate Employees for promotions; and to feature Employees in marketing materials and on the Company's website.
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	The Company may collect inferences drawn from other personal information to manage our relationship with Personnel.

Personal data about children under the age of 16	Personal information about Employees' dependents under the age of 16.	The Company collects information about Employees' dependents under the age of 16 if Employees voluntarily provide such information in connection with the enrollment and administration of benefits and other human resource purposes that involve dependents.
Legal and confidential information	Information necessary to respond to law enforcement and governmental agency requests; comply with legal and contractual obligations; exercise legal and contractual rights; and initiate or respond to legal claims.	The Company collects this information to comply with legal and contractual requirements and to establish, exercise, and defend legal and contractual rights and claims.
Emergency contact information	Name and contact information; relationship to employee	The Company collects this information to contact the Employee's designated emergency contact persons in the event of an emergency.
Beneficiary information	Name and contact information; relationship to the Employee; birth date; Social Security number; information necessary to process benefits claims.	The Company collects this information to enroll and administer benefits programs for beneficiaries of Employees.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

The Company obtains the categories of personal information listed above from the following categories of sources directly from you. We may also combine personal information collected from other sources with the personal information you provide to us. For example, we may collect information from: Recruiters; prior employers (for example, references), professional references you provide to us; educational institutions; pre-employment screening services; credentialing and licensing organizations; publicly available sources such as your social media profile (for example, LinkedIn, X (fka Twitter), Facebook, or Instagram); from publicly accessible sources; directly from a third-party, such as sanctions screening providers, credit reporting agencies, or customer due diligence providers; from a third-party with your consent, such as your bank; from cookies on our website; from advertising networks; from social networks; via our IT systems, such as door entry systems, reception logs, automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems; any other relevant systems; and third parties as necessary for providing you with benefits and ancillary services; and other sources as directed by you.

## Use of Personal Information

In addition to the specific business purposes above, we may use, disclose, or share the personal information we collect for one or more of the following business purposes:

- Comply with all applicable laws and regulations.
- Recruit and evaluate job applicants and candidates for employment.
- 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; and
- Manage and monitor employee access to company facilities, equipment, and systems.
- Conduct internal and external (such as customers and distributors) 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 and for compliance with internal and external audits.
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking.
- Administer and maintain the Company's operations, including for safety purposes.
- Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents.

For example, we may share your personal information with the following parties:

- **Affiliates.** We may share your personal information with our Affiliates.
- **Service Providers.** We use service providers to operate, host and facilitate our operations and business (including human resources operations). These include hosting, technology, and communication providers; security and fraud prevention consultants; analytic providers; background and reference check screening services; payment service providers; third-parties approved by you, including social media sites you choose to link your account to or third-party payment providers; credit reporting agencies; our insurers and brokers; our banks; and hiring process and benefits management and administration tools.
- **Government authorities and law enforcement.** In certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to

meet national security or law enforcement requirements.

- **Business transfers.** Your personal information may be transferred to a third party if we undergo a merger, acquisition, bankruptcy, or other transaction in which that third party assumes control of our business (in whole or in part).
- **Professional advisors.** We may share your personal information with our professional advisors.
- **Other.** We may also share your personal information with third parties for purposes of fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting, and investigating security incidents and potentially illegal or prohibited activities; protecting the rights, property or safety of you, us or another party; enforcing any agreements with you; fulfilling our obligations in regard to customer/third-party contracts, agreements, and audits; responding to claims; and resolving disputes.

We have not sold Personal information in the twelve (12) months preceding the Effective date of this policy.

### **Use of Personal Information**

- We may share your personal information as necessary long as necessary to fulfill the purposes for which we collect it, such as to provide services you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us, and/or as described above.
- We will not knowingly sell (as defined by CCPA) the personal information, including any sensitive personal information, we collect about our employees or applicants for employment or share it with third parties for cross-context behavioral advertising. We do not knowingly sell or share personal information about consumers under age 16.

Please contact us as described below for more information on our employee data retention schedule.

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### **Your Rights**

If you are a California employee, you have the following rights with respect to your Personal information:

1. The right to know what Personal information we have collected about you, including the categories of Personal information, the categories of sources from which we collected Personal information, the business or commercial purpose for collecting, sharing, or selling Personal information (if applicable), the categories of third parties to whom we disclose Personal information (if applicable), and the specific pieces of Personal information we collected about you. The Company will take steps to verify your identity upon receipt of any request by you.

2. The right to delete Personal information that we collected from you, subject to certain exceptions. The Company will take steps to verify your identity upon receipt of any request by you.
3. The right to correct inaccurate Personal information that we maintain about you. The Company will take steps to verify your identity upon receipt of any request by you.
4. If we sell or share Personal information, the right to opt-out of the sale or sharing;
5. If we use or disclose sensitive Personal information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and
6. The right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by the CCPA.

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## Contact

## Information

If you have any questions or concerns regarding this Privacy Notice or the collection of your personal information, or to submit a request to know, delete, and/or correct, please contact:

**Phone:** 800-531-7912

**Website:** <https://chg.com>

**Email:** [customerservice@chg.com](mailto:customerservice@chg.com), or [privacy@chg.com](mailto:privacy@chg.com)

**Postal Address:** C.H. Guenther, 2201 Broadway Street, San Antonio, Texas 78215

We are committed to ensuring this Privacy notice is accessible to individuals with disabilities. If you wish to access this notice in an alternative format, please contact us as described above.