



SAFETY | COMMITMENT | RESPECT | RELATIONSHIPS | OWNERSHIP

### California Consumer Privacy Act Notice of Collection

Dear Employee, Applicant or Contractor:

Respecting the privacy of our employees, job applicants and independent contractor service providers is an essential part of our privacy program. We are committed to the proper handling of the Personal Information collected or processed in connection with your employment, prospective employment or contractor relationship with us. This disclosure describes categories of Personal Information we collect and the purposes for which we process that information in accordance with the California Consumer Privacy Act as amended by the California Privacy Rights Act (the "CCPA") and related regulations. The CCPA defines Personal Information as categories of information that identifies, relates to, describes or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to an individual or household.

We collect, receive, maintain and/or disclose Personal Information internally and with our legal counsel and human resource consultants, and service providers including, but not limited to, alarm and security providers, vehicle and equipment lessors, vehicle GPS services, gas card providers, credit card providers, ESOP administrator and government agencies. The categories and the purposes described below for use of Personal Information reflects data kept within our systems and processed across our systems.

Categories of Personal Information Collected	
Category A	Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers, employee numbers, passwords, email addresses
Category B	Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history financial information, medical information and health information <sup>1</sup>
Category C	Characteristics of protected classifications under California or federal law, <sup>2</sup> such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and marital status

<sup>1</sup> This includes name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, driving record, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, holdings of shares acquired through stock option or purchase plans, interests in ESOP, or any other financial information, medical information, or health insurance information, union affiliation, vaccination status, virus infections and virus close contacts, drug and alcohol testing results, criminal history, driving record.

<sup>2</sup> This includes sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), age (40 and over), race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, , immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, request for leave, workers compensation claims.

Category D.	Internet or network activity information, such as browsing history and interactions with our website, applications or systems
Category E.	Geolocation data, such as device location and vehicle GPS
Category F.	Audio, electronic, visual, and similar information, such as emails, facial recognition technology, images and audio or video recordings created by security devices and directory photos
Category G.	Professional or employment-related information, such as work history and prior employer, human resources data and data necessary for benefits and related administrative services
Category H.	Emergency contact information, such as name, relationship and phone number

Personal Information may be collected for the following purposes:

1. To comply with state and federal law and regulations;
2. To process payroll;
3. To track time and attendance;
4. To manage workers' compensation claims;
5. To administer and maintain benefits, including group health insurance;
6. To administer retirement service;
7. To manage employee performance of their job duties including promotions, discipline, and/or termination;
8. To conduct workplace investigations;
9. To evaluate job applicants and candidates including performing background checks;
10. To verify ability to operate company vehicles and equipment;
11. To grant and monitor employees' access to secure facilities;
12. To implement and manage electronic security measures on devices that are connected to networks and systems including smartphones;
13. To implement and manage information technology and communications systems and document management;
14. To perform due diligence on employee records for purposes of corporate transactions such as merger investigation;
15. To maintain commercial insurance policies and coverages, including workers' compensation and auto and business liability insurance;
16. To anonymize and/or aggregate data for workforce analytics and benchmarking;
17. To facilitate operation of vehicles and equipment;
18. To perform surveillance and provide security, video or otherwise;
19. To monitor location and status of company vehicles and equipment;
20. To maintain an employee photo directory;
21. To have emergency contacts on file and included in Emergency Plans which may be shared with customers and others;
22. To administer the Employee Stock Purchase Plan (ESOP) and Trust;
23. To administer the Stock Purchase Plan(s) and manage share ownership information on behalf of shareholders;
24. Otherwise within the scope of current or former roles as an employee, job applicant or contract;
25. To administer our safety programs;

- 26. For tax record keeping and reporting;
- 27. To manage labor relations with union and perform obligations under Collective Bargaining Agreements; and
- 28. To support responses to litigation and discovery responses

We do not collect sensitive Personal Information for the purpose of inferring characteristics about workforce members.

We do not (i) sell Personal Information to anyone or (ii) share Personal Information with any third parties, although Personal Information is disclosed to service providers as and for purposes provided above.

Our applicable retention period policies are set forth below.<sup>3</sup> For any material not listed, the criterion used to determine the retention period is consideration of our legal obligations or potential legal obligations including the potential need to use comparative data for defense of claims, whether it would be impossible or take “disproportionate effort,” as defined for the CCPA, to delete the Personal Information, the potential impact on employees, amount, nature, and sensitivity of the personal data being processed, the potential risk of harm from unauthorized use or disclosure of the personal data, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements. Such determinations will be made by our Executive Committee.

<b>Employment, Personnel and Pension:</b>	<b>Paper Retention</b>	<b>Electronic Retention</b>
Personnel Records (including):		
Job classifications	5 yr	10 yr post emplmt
Terms of employment (offer letter)	5 yr	10 yr post emplmt
Training and testing files	5 yr	5 yr
Performance evaluations	10 yr	10 yr post emplmt
Promotions and demotions	10 yr	10 yr post emplmt
Disciplinary notices	10 yr	10 yr post emplmt
Job applications	1 mo	6 mo
Resumes	1 mo	6 mo
Employment referral records	1 yr	5 yr
Help wanted ads	Until filled	n/a
Opportunities for training, promotion, overtime	As needed	as needed
Salary information	5 yr	10 yr post emplmt
	10 yr	10 yr post emplmt
Employee contracts	3 yr after term	20 yr
Personnel files (terminated)	10 yr	Permanent
Personnel files (Disability Retirement, Terminal by Disciplinary Action, Resignation with Fault, AWOL)	10 yr	Permanent

<sup>3</sup> Notwithstanding such retention policies, some information, such as work history records and safety training records, may or will be retained for longer periods to support responses to litigation and/or due to the practical inability to delete or purge the information within the periods indicated or at all.

Retirement and pension records	Until full distribution	Until Full Distribution
Employee Benefits Data notices and summaries	6 years but not less than 1 year following a plan termination.	6 years but not less than 1 year following a plan termination.
Documentation of benefits elections, beneficiary designations, eligibility determinations, COBRA Plan descriptions and earnings.	3 yr	As above
I-9 Forms	Same as electronic	Later of 3 years from hire date or 1 year after termination

<b>Safety:</b>		
DMV Records	3 yr	3 yr
Drug and Alcohol Testing	5 yr	5 yr
OSHA/Medical/Exposure/MSDS	30 yr	30 yr
Safety Records	5 yr	5 yr

<b>Tax:</b>		
Tax Returns	15 yr	Permanent

<b>Union:</b>		
Reports	Per Union Agreement	Per Union Agreement

If you have any questions about the collection and processing of your Personal Information or about the security of your Personal Information, please contact Human Resources.

Last updated: 1/1/2025

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