

NWN Privacy Notice for California Employees, Contractors, and Applicants

NWN Corporation, Carousel Industries of North America, LLC, and Leverage Information Systems, Inc. (“NWN” “we”, “our” or “us”) collects and uses your personal information, including sensitive personal information, for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance/the business purposes listed in the chart below. We are committed to properly handling the personal information collected or processed in connection with your employment relationship with us.

We will not sell 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.

To view our full privacy policy, visit www.nwn.ai/privacy-policy.

We may collect the personal information categories listed in the table below. The table also lists, for each category, our expected retention period, collection and use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

Personal Information Category	Retention Period	Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising Purposes
<p>Identifiers, such as your full name, contact information, gender, date of birth, signature, Social Security number, driver's license or state identification numbers, and similar information for your dependents and beneficiaries.</p>	<p>No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.</p>	<ul style="list-style-type: none"> • Recruit and process employment applications, including verifying eligibility for employment and conducting background and related checks • Conduct employee onboarding • Maintain and administer payroll and employee benefit plans, including enrollment and claims handling • Maintain personnel records and complying with record retention requirements • Provide employees with human resources management services and employee data maintenance and support services • Communicate with employees and their emergency contacts and plan beneficiaries 	<p>No</p>

Personal Information Category	Retention Period	Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising Purposes
		<ul style="list-style-type: none"> • Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws • Prevent unauthorized access to or use of NWN property, including information systems, electronic devices, network, and data • Ensure employee productivity and adherence to NWN policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of NWN's policy • Respond to law enforcement requests and as required by applicable law or court order • Exercise or defend the legal rights of NWN's and its employees, affiliates, customers, contractors, and agents • For NWN product demonstration purposes 	
<p>California Customer Records employment and personal information, such as your name, signature, Social Security number, physical characteristics or description, photograph, address, telephone number, passport number,</p>	<p>No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.</p>	<ul style="list-style-type: none"> • Same purposes as for identifiers category 	<p>No</p>

Personal Information Category	Retention Period	Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising Purposes
<p>driver's license or state identification card number, insurance policy number, education, current employment, employment history, membership in professional organizations, licenses and certifications, bank account number, credit card number, debit card number, or any other financial, medical or health insurance information.</p>			
<p>Protected classification characteristics under California or federal law, such as 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, reproductive health decisionmaking, military and veteran status, or genetic information (including familial genetic information).</p>	<p>No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.</p>	<ul style="list-style-type: none"> • Comply with federal and state equal employment opportunity laws • Design, implement, and promote NWN's diversity and inclusion programs • Perform workforce analytics, data analytics, and benchmarking • Conduct internal audits, grievances, and suspected violations of NWN policy • Exercise or defend the legal rights of NWN and its employees, affiliates, customers, contractors, and agents 	<p>No</p>
<p>Commercial information, such as transaction information,</p>	<p>No longer than necessary to fulfill the purposes outlined in this Notice, unless a</p>	<ul style="list-style-type: none"> • Respond to law enforcement requests and as required by applicable law or court order 	<p>No</p>

Personal Information Category	Retention Period	Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising Purposes
purchase history, and financial details.	longer retention period is required or permitted by law.	<ul style="list-style-type: none"> • Conduct internal audits, grievances, and suspected violations of NWN policy • Exercise or defend the legal rights of the NWN and its employees, affiliates, customers, contractors, and agents 	
Biometric information , such as facial recognition, fingerprints, iris or retina scans, keystroke, or other physical patterns, and certain wellness metrics.	No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.	<ul style="list-style-type: none"> • Fingerprinting for a criminal background check after an initial offer of employment is made. Criminal background checks protect the company, mitigate risk, and avoid potential negligent hiring lawsuits • Administer and design health wellness programs • Exercise or defend the legal rights of NWN and its employees, affiliates, customers, contractors, and agents 	No
Internet or other similar network activity information , including all activity on NWN's information systems (such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames, and passwords) and all activity on communications systems (such as phone calls, call logs, voicemails, text messages, chat logs,	No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.	<ul style="list-style-type: none"> • Facilitate the efficient and secure use of NWN's information systems • Ensure compliance with NWN's information systems policies and procedures • Comply with applicable state and federal laws • Prevent unauthorized access to, use, or disclosure or removal of NWN's property, records, data, and information • Enhance employee productivity 	No

Personal Information Category	Retention Period	Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising Purposes
app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of company-issued devices).		<ul style="list-style-type: none"> • Conduct internal audits and investigate complaints, grievances, and suspected violations of NWN policy • Exercise or defend the legal rights of the NWN and its employees, affiliates, customers, contractors, and agents 	
Geolocation data , such as the time and physical location related to use of an internet website, application, or device, and GPS location data from mobile devices of employees who utilize NWN's company devices and communications systems..	No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.	<ul style="list-style-type: none"> • Improve safety of employees, customers, and the public regarding use of NWN's property and equipment • Prevent unauthorized access, use, or loss of NWN's property • Improve efficiency, logistics, and supply chain management • Ensure employee productivity and adherence to NWN's policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of NWN's policy • For NWN product demonstration purposes 	No
Sensory and surveillance data , such as COVID-19 related temperature checks and call monitoring and video surveillance.	No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.	<ul style="list-style-type: none"> • Comply with applicable state and federal laws, including on workplace health and safety • Prevent unauthorized access, use, or loss of NWN property • Improve customer service • Exercise or defend the legal rights of NWN and its 	No

Personal Information Category	Retention Period	Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising Purposes
		employees, affiliates, customers, contractors, and agents	
<p>Professional or employment-related information, such as employment application information (work history, academic and professional qualifications, educational records, references, and interview notes, background check, drug testing results, work authorization, performance and disciplinary records, salary, bonus, commission, and other similar compensation data, benefit plan enrollment, participation, and claims information, leave of absence information including religious, military and family obligations, health data concerning employee and their family members.</p>	<p>No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.</p>	<ul style="list-style-type: none"> • Recruit and process employment applications, including verifying eligibility for employment, background checks, and onboarding • Design and administer employee benefit plans and programs, including for leaves of absence • Maintain personnel records and comply with record retention requirements • Communicate with employees and their emergency contacts and plan beneficiaries • Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws • Prevent unauthorized access to or use of NWN's property, including its information systems, electronic devices, network, and data • Ensure employee productivity and adherence to NWN's policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of NWN policy • Evaluate and provide useful feedback about job 	<p>No</p>

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		<p>performance, facilitate better working relationships, and for employee professional development</p> <ul style="list-style-type: none"> • Exercise or defend the legal rights of NWN and its employees, affiliates, customers, contractors, and agents 	
<p>Non-public education information, such as education records, degrees and vocational certifications obtained, report cards, and transcripts.</p>	<p>No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.</p>	<ul style="list-style-type: none"> • Evaluate an individual's appropriateness for hire, or promotion or transfer to a new position at NWN 	<p>No</p>
<p>Inferences drawn from other personal information to create a profile or summary, for example, an individual's preferences, abilities, aptitudes, and characteristics.</p>	<p>No longer than necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law.</p>	<ul style="list-style-type: none"> • Engage in human capital analytics, including to identify correlations about individuals and job success, analyze data to improve retention and productivity, and analyze employee preferences to inform human resources policies and procedures • Conduct applicant reference checks to assist in hiring decisions 	<p>No</p>

Sensitive personal information is a subtype of personal information consisting of specific information categories. While we collect information that falls within the sensitive personal information categories listed in the table below, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a person.

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 HR-General@nwn.ai.

Effective Date: January 1, 2023, last revised on January 15, 2025.