



## Privacy Policy for California Employees and Applicants

**Effective Date: January 1, 2023**

**Reviewed/Updated: January 30, 2023**

**AHF, LLC dba AHF Products** and its parents, affiliates, or subsidiaries (collectively "AHF", "we" or "us") collects and uses Personal Information for human resources, employment, benefits administration, health and safety, business-related purposes and to be in legal compliance. We adopt this policy to comply with the California Consumer Privacy Act of 2018 (CCPA) and California Privacy Rights Act of 2020 (CPRA).

### Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee or applicant ("**Personal Information**"). Personal information does not include:

1. Publicly available information from government records.
2. Deidentified or aggregated employee or applicant information.
3. Information specifically excluded, 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), clinical trial data, or other qualifying research data; and
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We have collected the following categories of personal information from applicants or employees within the last twelve (12) months for each category (the retention periods are as stated in AHF Global Policy GP 70-E, [at Appendix 1 Records Retention Schedule](#) found on the employee HUB).

Category	Examples	Collected
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number (SSN), 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.	Yes
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).	Yes
Contract information.	Home address, telephone numbers, email addresses, and emergency contact information.	Yes
Dependent or other individual's information.	Full name, address, date of birth, and Social Security numbers (SSN).	Yes
Financial information.	Banking details, tax information, payroll information, and withholdings.	Yes
Health and safety information.	Health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, and health insurance policy information.	Yes
Educational and professional background.	Work history, academic and professional qualifications, educational records, references, and interview notes.	Yes
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, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No

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Internet or other similar network activity.	Browsing history, search history, information on an employee or applicant's interaction with a website, application, or advertisement.	Yes
Geolocation data.	Time and physical location related to use of an internet website, login, application, device, or physical access to a Company office location.	Yes
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
Non-public education information (per the Family Educational Rights and Privacy Act).	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.	Yes
Sensitive personal information.	Personal Information that is not publicly available and reveals: (1) employee or applicant's Social Security, driver's license, state identification card, or passport number; (2) employee or applicant's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (3) employee or applicant's precise geolocation; (4) employee or applicant's racial or ethnic origin, religious or philosophical beliefs, or union membership; (5) the contents of an employee or applicant's mail, email and text messages, unless the business is the intended recipient of the communication; (6) employee or applicant's genetic data; (7) the processing of biometric information for the purpose of uniquely identifying an employee or applicant; and (8) personal information collected and analyzed concerning an employee or applicant's health; or (9) personal information collected and analyzed concerning an employee or applicant's sex life or sexual orientation.	Yes
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

We obtain the categories of personal information listed above from the following categories of sources:

1. Directly from you. For example, from forms you complete or other open-source information we may gather regarding your employment or application. This source includes forms you complete to provide permission for us to run background, credit, or other relevant checks.

2. Indirectly from you. For example, from observing your actions on our Website or open-source information we may collect regarding your employment or application.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Use of Personal Information**

We may use, sell, or disclose the personal information we collect for one or more of the following purposes:

The Company collects Personal Information to use or disclose as appropriate to:

1. Comply with all applicable laws and regulations.
2. Recruit and evaluate job applicants and candidates for employment.
3. Conduct background checks.
4. 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; and
  - completion of tasks needed for the effectiveness of the HR function.
5. Manage and monitor employee access to company facilities, equipment, and systems.
6. Conduct internal audits and workplace investigations.
7. Investigate and enforce compliance with and potential breaches of Company policies and procedures.
8. Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company.
9. Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
10. Perform workforce analytics, data analytics, and benchmarking.
11. Administer and maintain the Company's operations, including for safety purposes.
12. For client marketing purposes.
13. Exercise or defend the legal rights of AHF and its employees, customers, contractors, and agents.

If we use a third party to collect your personal information, we require the third-party collector to provide notice to you at collection.

### **Sharing Personal Information**

We may share your personal information with our parent, subsidiaries, and affiliates and our agents and representatives in the course of normal business, as well as to our partners, vendors, distributors, and

suppliers, some of which may be outside the United States. We may share your information with certain service providers in order to conduct our business operations. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

In the preceding twelve (12) months, AHF has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

Personal Information Category	Business Purpose Disclosures
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Applicants: Local, State, and Federal Government Units such as the EEOC; Background Check Provider.  Employees: Third Party Benefit Providers, such as health insurance; Insurance broker; Payroll Provider; Local, State, and Federal Government Units such as State taxing authority; as may be required by law such as a court-ordered garnishment.
Protected classification characteristics under California or federal law.	Applicants: Local, State, and Federal Government Units such as the EEOC; Background Check Provider.  Employees: Third Party Benefit Providers, such as health insurance; Insurance broker; Payroll Provider; Local, State, and Federal Government Units such as State taxing authority; as may be required by law such as a court-ordered garnishment.
Contract information (employees only).	Third Party Benefit Providers, such as health insurance; Insurance broker; Payroll Provider; Local, State, and Federal Government Units such as State taxing authority; as may be required by law such as a court-ordered garnishment.
Dependent or other individual’s information (employees only).	Third Party Benefit Providers, such as health insurance; Insurance broker; as may be required by law such as a court-ordered garnishment.
Financial information (employees only).	Payroll Provider; Local, State, and Federal Government Units such as State taxing authority; as may be required by law such as a court-ordered garnishment.

Health and safety information (employees only).	Third Party Benefit Providers, such as workers compensation carrier; Insurance broker; Payroll Provider; Medical providers such as workers compensation doctors.
Educational and professional background.	Applicants: Local, State, and Federal Government Units such as the EEOC; Background Check Provider.  Employees: Local, State, and Federal Government Units such as the EEOC.
Biometric information.	None
Internet or other similar network activity (employees only).	Not shared
Geolocation data.	Not shared
Sensory data.	None
Non-public education information (per the Family Educational Rights and Privacy Act).	Applicants: Background Check Provider; as may be required by law.  Employees: Third Party Benefit Providers, such as for purposes of verifying tuition reimbursement; as may be required by law.
Sensitive Personal Information.	Applicants: Local, State, and Federal Government Units such as the EEOC; Background Check Provider; as may be required by law such as a court-ordered garnishment.  Employees: Third Party Benefit Providers, such as health insurance; Insurance broker; Payroll Provider; Local, State, and Federal Government Units such as State taxing authority; as may be required by law such as a court-ordered garnishment.
Inferences drawn from other personal information.	None

**We do not sell personal information.** In the preceding twelve (12) months, Company has not sold personal information to the categories of third parties indicated in the chart above.

## **Your Rights and Choices**

The CCPA/CPRA provides employees or applicants who are California residents with specific rights regarding their personal information. This section describes your CCPA/CPRA rights and explains how to exercise those rights.

### **Right to Know and Data Portability**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity, we will disclose to you:

1. The categories of personal information we collected about you.
2. The categories of sources for the personal information we collected about you.
3. Our business or commercial purpose for collecting or selling that personal information.
4. The categories of third parties with whom we share that personal information to include sharing information for **cross-context behavioral advertising**.
5. If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
6. The specific pieces of personal information we collected about you (also called a data portability request).

### **Right to Delete**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
2. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
3. Comply with a legal obligation.

We will delete or deidentify personal any information not subject to one of these exceptions from our records and will direct our service providers and contractors to take similar action.

## Right to Correct

You have the right to request us to correct any inaccurate personal information about you. If any personal information requires correction, we will use commercially reasonable efforts to fulfill your correction request.

## Exercising Your Rights to Know, Delete or Correct

To exercise your rights to know or delete described above, please submit a request by either:

**Phone:** 1-855-243-2521

**Website:** [www.ahfproducts.com/california-privacy](http://www.ahfproducts.com/california-privacy)

**Email:** [Privacy@ahfproducts.com](mailto:Privacy@ahfproducts.com)

**Postal Address:**

AHF Products Privacy  
c/o Legal Department  
3840 Hempland Road  
P. O. Box 566  
Mountville, PA 17554

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct related to your personal information.

You may only submit a request to know twice within a 12-month period.

Your request to know, delete or correct must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will pass your deletion requests on to service providers, contractors, and, unless impossible or involves disproportionate effort, to all third parties to whom we sold or shared the information.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

## Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact [Privacy@ahfproducts.com](mailto:Privacy@ahfproducts.com) or call 1-855-243-2521.



We endeavor to substantively respond to a verifiable employee or applicant request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you are an employee with an AHF email account, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable employee or applicant request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### **Personal Information Sales Opt-Out, Direct Marketing Opt-Out and Opt-In Rights**

You have the right to direct us to not sell your personal information at any time (the "right to opt-out").

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

[www.ahfproducts.com/california-privacy](http://www.ahfproducts.com/california-privacy) (select "Opt-Out - Do Not Sell my Personal Information").

You have the right to direct us not to share your personal information for cross-context behavioral advertising at any time (the "right to opt-out").

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

[www.ahfproducts.com/california-privacy](http://www.ahfproducts.com/california-privacy) (select "Opt-Out - Do Not Share my Personal Information").

We will only use personal information provided in an opt-out request to review and comply with the request.

You may change your mind and opt-in to personal information sales and cross-context behavioral advertising at any time at:

[www.ahfproducts.com/california-privacy](http://www.ahfproducts.com/california-privacy) (select "Opt-In - AHF may Share my Personal Information").

### **Non-Retaliation**

We will not retaliate against you for exercising any of your CCPA/CPRA rights.

### **Children**

Our websites are not intended for children under 13 years of age. In the event we learn that we collected personal data from a child under the age of 13 through our website, we will delete the data unless they were collected with the appropriate consent or as otherwise permitted under applicable laws.

### **Data Transfers**

If you are accessing the Website from outside of the U.S., please be aware that data collected through the Website may be transferred to the U.S. (We are based in the U.S. and our Website is hosted on servers in the U.S.). We transfer data to the U.S. for the purposes described in this Privacy Notice or our description at the point of collection or handling, and otherwise not prohibited by applicable law. Laws in the U.S. may be different from and provide less protection than those in the country you are located. We may also transfer personal data amongst ourselves or with service providers in other countries in order to process employee or applicant privacy requests.

### **Third-party practices**

Our Website may contain links to third-party websites. If you visit a third-party website, you are subject to that website's privacy notice and not ours.

### **Data storage and security**

We may store your personal data in the U.S. or in other countries. Except as otherwise permitted or required by law, we only retain your personal data for as long as necessary to fulfill the purposes they were collected for. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use of processing by other means, and any applicable legal requirements.

We maintain reasonable administrative, technical, and physical safeguards to protect your data from accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. Our service providers are also required to adhere to reasonable security practices to further ensure your data. That being said, digital transmission and storage of data is not completely secure, and we cannot guarantee the safety of your data.

### **Changes to Our Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date.

**Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

**Contact Information**

If you have any questions or comments about this notice, the ways in which AHF collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 1-855-243-2521

**Website:** [www.ahfproducts.com/california-privacy](http://www.ahfproducts.com/california-privacy)

**Email:** [Privacy@ahfproducts.com](mailto:Privacy@ahfproducts.com)

**Postal Address:**

AHF Products Privacy  
c/o Legal Department  
3840 Hempland Road  
P. O. Box 566  
Mountville, PA 17554

If you need to access this Policy in an alternative format due to having a disability, please contact [Privacy@ahfproducts.com](mailto:Privacy@ahfproducts.com) or by phone 1-855-243-2521.