

## CALIFORNIA PRIVACY RIGHTS ACT

This policy is intended to comply with the requirements of the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”) and to inform you of your rights under the CPRA. This policy is subject to change and may be modified in accordance with further developments under applicable law. This policy shall be effective as of January 1, 2023, which is the effective date of the CPRA.

### INFORMATION WALTER P. MOORE COLLECTS AND HOW WALTER P. MOORE COLLECTS IT

#### **Personal Information**

Walter P. Moore (the “Company”) may collect and use certain employee Personal Information as a result of and in connection with your employment with the Company. The Company may collect and use certain Personal Information about employees that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee, including but not limited to a real name, alias, postal address, personal identifiers, IP addresses, email address, or other similar identifiers.

Personal Information may include name, date of birth, marital status, phone number(s), personal e-mail address, physical/ mailing address, other contact information, title, employment history, education, job qualifications, and other relevant personal data.

#### **Sensitive Personal Information**

The Company may also collect and use the following Sensitive Personal Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee, including the following (some Personal Information included in this category may overlap with other categories):

- Employment-related information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, address, telephone number, education, characteristics of protected classifications under California or federal law, employment history, bank account number, or any other financial information, social security number, driver’s license, state identification card, passport number, 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 the account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, contents of mail, email, and text messages, genetic data, biometric information, health information or sexual orientation;
- Internet or other electronic network activity information, including but not limited to browsing history, search history, and information regarding a consumer’s interaction with a website, application, or advertisement;

- Employment candidacy information, including, but not limited to contact information, resume, and salary information;
- Benefits-related information, including, but not limited to retirement information, biometric testing information, and purchasing habits regarding any Company-sponsored benefits programs; and
- Inferences drawn from any of the information identified above to create a profile about employees reflecting the employee’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**HOW PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION IS COLLECTED**

The Company collects this information:

- Directly from you when you provide it to the Company;
- From a third party with your consent (e.g., your bank); and
- Via the Company’s IT systems, including door entry systems and reception logs, and automated monitoring of the Company’s technical systems such as computer networks, emails, and instant messaging systems.

**HOW AND WHY THE COMPANY USES PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION**

The Company only uses Personal Information and Sensitive Personal Information for legitimate business-related purposes. For example, the Company might use Personal Information or Sensitive Personal Information in order to comply with legal and regulatory obligations, where you have given your consent, or for the Company’s legitimate interest.

The table below provides examples of how the Company uses and/or processes Personal Information and Sensitive Personal Information and the Company’s reasons for doing so:

<b>How the Company may use Personal Information and Sensitive Personal Information</b>	<b>The Company’s reasons</b>
To consider job applicants for employment with the Company	For the Company’s legitimate interests related to selection of employees for hire
To facilitate the employment relationship with the Company	For the Company’s legitimate interests to ensure the Company is complying with its legal and regulatory obligations and to make sure the Company is following its own internal procedures
To effectively process payroll	For the Company’s legitimate interests to fulfill its obligations to pay its employees

To manage employee job performance	For the Company’s legitimate interests to make sure the Company is as efficient as possible and to make sure the Company is following its own internal procedures
To comply with applicable state and federal law requiring prospective employers or employers to maintain certain records	For the Company’s legitimate interests to make sure the Company is complying with its legal and regulatory obligations
To administer and maintain group health insurance benefits, 401K, and/or retirement plans	For the Company’s legitimate interests to make sure the Company is complying with its legal and regulatory obligations and to make sure the Company is following its own internal procedures

**DISCLOSURE OF EMPLOYEE PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION**

The Company will not sell any of your Personal Information or Sensitive Personal Information to any outside organization. The Company only discloses your Personal Information or Sensitive Personal Information to third parties as reasonably necessary to carry out the permitted uses described in this policy. For example, the Company may share Personal Information or Sensitive Personal Information with:

- The Company’s payment processors, payroll providers, employee benefits providers, technical and customer support contractors, and other service providers who are required to keep such Personal Information or Sensitive Personal Information confidential and are prohibited from using it other than to carry out their services on behalf of the Company;
- The Company’s successors in the event of a sale, merger, acquisition, or similar transaction affecting the relevant portion of the Company’s business; and
- Legal and governmental authorities or other third parties, to the extent required to comply with a legal order or applicable law.

The Company may disclose both Personal Information and Sensitive Personal Information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with an employee for a business purpose to one or more third parties.

**WHERE PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION IS MAINTAINED**

Personal Information and Sensitive Personal Information may be maintained at the Company’s offices, by third-party service providers, or by representatives and/or agents. As discussed more fully below, the Company has in place reasonable safeguards to protect employee Personal Information and Sensitive Personal Information, including that such information is (1) maintained in secured file cabinets and secure access offices; (2) provided to only those on a need to know basis who have been advised regarding the need to protect the confidentiality of such information;

and (3) protected by technological security measures, including that such information is password protected and/or encrypted.

## **HOW LONG PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION WILL BE MAINTAINED BY THE COMPANY**

The Company will maintain Personal Information and Sensitive Personal Information while you are an employee of the Company. Thereafter, the Company will keep Personal Information and Sensitive Personal Information for as long as is necessary to respond to any questions made by you or on your behalf or to comply with applicable law.

The Company will not retain Personal Information or Sensitive Personal Information for longer than necessary to fulfill the purposes set out in this policy. Different retention periods apply for different types of Personal Information.

When it is no longer necessary to retain Personal Information or Sensitive Personal Information, the Company will delete or anonymize it.

## **KEEPING PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION SECURE**

The Company has appropriate security measures in place to prevent Personal Information and Sensitive Personal Information from being accidentally lost or used or accessed in an unauthorized way. The Company limits access to your Personal Information and Sensitive Personal Information to those who have a genuine business need to access it. Those processing your Personal Information and Sensitive Personal Information will do so only in an authorized manner and are subject to a duty of confidentiality. The Company also has procedures in place to deal with any suspected data security breach. The Company will notify you and any applicable regulator of a suspected data security breach where the Company is legally required to do so.

## **RIGHTS REGARDING PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION**

Effective January 1, 2023, California employees have the following rights with respect to sensitive personal information collected during the preceding 12 months:

- Right to know what Personal Information or Sensitive Personal Information is collected by the Company;
- Right to request to access your Personal Information or Sensitive Personal Information;
- Right to know or limit what Sensitive Personal Information is sold or shared and to whom;
- Right to request your Personal Information or Sensitive Personal Information be deleted;
- Right to request your Personal Information or Sensitive Personal Information be corrected with accurate information; and
- Right to opt-out of automated decision-making technology.

The Company will provide this information free of charge up to two (2) times in any twelve (12) month period within 45 days of receiving your verifiable request (including verification of your identity and your California residency), subject to delays and exclusions permitted by law.

You have the right to request that the Company delete any Personal Information or Sensitive Personal Information that the Company has collected about you. The Company will honor this request subject to the range of exclusions permitted by law. For example, the Company is not required to delete Sensitive Personal Information if it is necessary to complete a transaction, or reasonably used for an ongoing business relationship, or if it is used internally in a lawful manner that is compatible with the context in which the employee provided the information.

You also have the right to opt out of sharing your Personal Information or Sensitive Personal Information to third parties. However, the Company may share Personal Information or Sensitive Personal Information with third-party service providers in order to further the purposes for collecting such information as described in this policy.

The Company will not discriminate or retaliate against employees for exercising any rights under this policy. California residents may exercise the rights described above by contacting the Company as follows:

Email: [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com) (please use “California Privacy” in the subject line)

Toll Free Phone No.: 800-346-7300

Mail: Human Resources  
1301 McKinney  
Suite 1100  
Houston, TX 77010

The Company may require verification of your identity before further processing your request. In certain instances, the Company may be permitted by law to decline some or all of such request.

## **CHANGES TO THIS POLICY**

The Company may update this policy from time to time. The Company will always post the then-current version of this policy on the Company’s intranet and will indicate at the bottom-right of the policy the date on which the latest version took effect. Please review this policy from time to time to stay updated on the Company’s privacy practices.

## **CONTACT INFORMATION**

To ask questions or comment about this privacy policy and the Company’s privacy practices, contact us at: [humanresources@walterpmoore.com](mailto:humanresources@walterpmoore.com)