

CCPA Privacy Notice

Privacy Statement – California

Amended: July 2023

Your Rights and Choices

The California Consumer Privacy Act (“CCPA”) provides consumers’ or employees’ (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that ISEC, Inc. disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- The categories of personal information we collected about you
- The categories of sources for the personal information we collected about you
- Our business purpose for collecting that personal information
- To correct inaccurate Personal Information
- Limit how we can use your Sensitive Personal Information
- To opt out of the sale of your Personal Information, if applicable (see below);
- The categories of third parties with whom we share that personal information
- The specific pieces of personal information that we collected about you (also called a data portability request)
- If we disclosed your personal information for a business purpose, we will identify the personal information categories that each category of recipient obtained

California residents have the right to opt-out of the sale of their Personal Information under the CCPA. However, we do not sell or share (for cross-context advertising purposes) employee, applicant, or contractor Personal Information to any third parties. If our practices change, we will update this Notice and take any other necessary action to comply with applicable law.

Deletion Request Rights

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. Once we receive and confirm your verifiable consumer or employee request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

Exercising Access, Data Portability and Deletions Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer or employee request to us by either:

- Calling us at 844-925-6838
- Mailing a request to:
 - Postal Address: ISEC Inc.
Attn: Human Resources
6000 Greenwood Plaza Blvd, Suite 200
Greenwood Village, CO 80111

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer or employee request related to your personal information. You may also make a verifiable consumer or employee request on behalf of your minor child.

You may only make a verifiable consumer or employee request for access or data portability twice within a 12-month period. The verifiable consumer or employee request 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 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. Making a verifiable consumer or employee request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer or employee request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will confirm receipt of your request within 10 business days. Within 15 business days we will comply with a request to opt-out. We endeavor to respond to a verifiable consumer or employee request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. 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 the verifiable consumer or employee request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Consider in decisions regarding recruitment, selection, placement, training, promotion, transfer, compensation, benefits, layoffs, termination, employee activities and other employment areas.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer, employee, job applicant or device (“personal information”). We also collect information you provide for family members, dependents, beneficiaries, and emergency contacts of current and former employees. We have collected the following categories of personal information from consumers’ or employees’ data within the last twelve (12) months:

Category	Examples
A. 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.
B. 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.
C. 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).
D. Internet or other similar network activity (Employees Only).	Browsing history, search history, chat logs, geolocation, information on a consumer or employee's interaction with a website, application, or advertisement.
E. Employee Pre-Hire Documents	Job applications, resumes, professional references you provide to us, background check forms and results, drug test forms and results, motor vehicle forms and results, job interview notes where available or candidate evaluation records.
F. Professional or employment-related information.	Current or past job history, resumes, performance evaluations, education information, or job interview notes where available.
G. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer or employee 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 (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We also collect personal information from other sources:

- Directly from third party background check, motor vehicle and drug testing vendors
- Directly from applications through ISEC's website
- Indirectly from third-party job posting sites, brick and mortar vendors and other events in which applicants apply for positions
- Publicly available websites
- Data entered in Contact Page on ISEC's website

Use of Personal Information

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

- Fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a sales appointment, general information, or ask a question about our products or services, we will use that information to respond to your inquiry
- Attract, recruit, interview, and hire new employees; manage current employee files
- Comply with state and federal law requiring employers to maintain certain records
- Effectively process payroll
- Administer and maintain group health insurance benefits, 401K and/or retirement plans
- Manage employee performance and duties
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A:	Identifiers
Category B:	California Customer Records personal information categories
Category C:	Protected classification characteristics under California or federal law
Category E:	Employee Pre-Employment Documents
Category F:	Professional or employment-related information

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers
- Customers (General Contractors, Owners, Architects, etc.)
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you

In the preceding twelve (12) months, we have not sold any personal information.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time.

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, 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: 303.790.1444

Website: www.isecinc.com

Postal Address: ISEC Inc.

Attn: Human Resources

6000 Greenwood Plaza Blvd, Suite 200

Greenwood Village, CO 80111