



Pacific - California Privacy Rights Act Notice

as of July 1, 2023

FOR CALIFORNIA RESIDENTS ONLY

Notice Statement

Respecting the privacy of our employees and third parties is an essential part of our privacy rights program. We are committed to the proper handling of the Personal Information ("PI") and Sensitive Personal Information ("SPI") collected or processed in connection with your relationship with the company. This notice describes categories of PI and SPI that the company collects and the purposes for which we process that information in accordance with the California Consumer Privacy Act of 2018 ("CCPA") and the California Privacy Rights Act of 2023 ("CPRA"). For the avoidance of doubt, IMC-Pacific and affiliates (the "Company") do not sell any PI or SPI.

Exercising Your Rights

If you are a California resident, applicant, or employee, you may exercise any of your rights under the CCPA or CPRA. The Company will not discriminate against you for exercising such rights, including but not limited to:

- ❖ You have the right to access PI which we may collect or retain.
- ❖ You have the right to limit how your SPI is disclosed or shared with third parties.
- ❖ You have the right to request the erasure of your PI.
- ❖ You have the right to request correction of any inaccurate PI.

I. Personal Information We Collect

<u>Stages</u>	<u>Personal Information</u>
Applicant	What we Collect - Identifiers such as: name, contact information, address, education, internet protocol address, and employment history. How it is Used - Evaluation process for candidates for employment.
Post Offer	What we Collect - SPI such as: driver records, social security numbers, and/or other government issued ID numbers confirming citizenship/immigration status. Characteristics of protected classifications such as date of birth, race, national origin, and gender. How it is Used – Validating right to work, obtaining/verifying of background checks, confirming ability to meet trucking FMCSA (Federal Motor Carrier Safety Administration) requirements, tracking of time and attendance, and

	processing of payroll.
New Hire	<p>What we Collect - Bank account information and biometric finger scan.</p> <p>How it is Used – Allows the Company to administer payroll electronically per employee request.</p>
Active Employee	<p>What we Collect – Worker compensation and compliance and leave of absence requests that require medical information regarding employees' respective medical situation.</p> <p>How it is Used – To provide a service or support to the employee by request only.</p>
Benefit Eligible Employees	<p>What we Collect – When required, dependent information to include the date of birth and gender for benefit enrollment and administration.</p> <p>How it is Used – To administer and maintain benefits including: group health insurance, retirement, and other related benefit programs.</p>
Third Parties	<p>What we Collect – If you request entry upon Company property, you may be subject to security video recording, review of government-issued identification, and limited storage of government-issued identification.</p> <p>How it is Used – Any collected materials are used exclusively to ensure the safety and security of Company property and employees. To the extent there is a security incident, such materials will be reviewed and may be shared with law enforcement officials or other appropriate authorities.</p>

II. How Personal Information Is Collected

We collect most PI directly from you; however, we may also collect PI from the following:

- Publicly accessible sources;
- Directly from a third party for background checks or drug testing;
- A third party, such as a bank, financial institution, or advisor (with your consent);
- Consultants and other professionals we may engage in relation to your matter (with your consent);
- Our Information Technology systems, including:
 - Online case management, document management, and time recording systems;
 - Door entry systems and reception logs
- Security cameras

III. Other Purposes for Which Personal Information Is Collected

The purposes for which the company will collect or use your PI include:

- To comply with state and federal law and regulations.
- To maintain commercial insurance policies and coverages, including worker's compensation and other liability insurances.
- To aggregate data to perform workforce analytics, data analytics, and benchmarking.
- To conduct our business operations and administration in connection with matters as your employer or potential employer.
- To comply with our internal business processes and policies.
- To prevent unauthorized access and modifications to our systems.

IV. Disclosure Of Personal Information

The Company shall use a reasonable standard of care to store and protect from disclosure any PI or SPI collected using the principles of least-privileged access and by limiting access to PI and SPI to only those individuals with a 'need to know'. The Company utilizes appropriate physical, technical, and organizational security measures and procedures to store and to protect PI and SPI from unauthorized use, loss, alteration, destruction, or modification.

The Company shall retain your PI and SPI until the initial purpose for collecting and retaining such data has been satisfied. If you subsequently agree to a new or additional purpose, your PI or SPI may be retained further for that reason. Lastly, the Company may be obligated to share PI or SPI in the event the Company is subject to a request for disclosure associated with any applicable legal or regulatory obligation.

V. Length of time PI and SPI will be Retained

Table 1. Records Retention Schedule

Record	Department	Retention Period
Employee files after termination	HR	7 years
Payroll tax records	HR	7 years
Records for the Health Insurance Portability and Accountability Act (HIPAA)	HR	10 years

IMC Data Retention and Destruction Document Policy identifier: IT_STD_141 VR 01 - 9/22/2022

VI. Changing Employee Details and Contact Information

We want to maintain the most up-to-date information. Personal information can be changed in our HR/payroll records by request for any applicant or former employee. This information can also be updated by the employee through the ADP employee access portal, or alternatively by contacting the Human Resources department HumanResources@imcc.com.

Should you have any further inquiries or comments on the uses of PI or SPI, please speak to a

representative in the Human Resources Department at 901-480-4800 or via e-mail at HumanResources@imcc.com.

VII. Modifications And Revisions

We reserve the right to modify, revise, or otherwise amend this Privacy Notice at any time and in any manner. Any new version of this Notice will be posted on SharePoint. This Notice will be reviewed annually and updated, as necessary.

Version	Date Reviewed	Date Approved	Document Owner	Description
1	06/05/2023	06/26/2023	HR Department	Initial CPRA Policy