# WORKFORCE NOTICE ABOUT YOUR PERSONAL INFORMATION

#### **1.** Overview

This Notice explains your rights under the California Consumer Privacy Act ("**CCPA**") (Cal. Civ. Code § 1798.100 *et seq*.) and helps you understand how Caster Properties, Inc. d/b/a A-1 Self Storage ("**A-1**") collects and uses your Personal Information in compliance with the CCPA. In this Notice, the terms "company," "us," "we," and "our" refer to A-1 and its affiliates and subsidiaries.

#### **2.** Who This Notice Applies To

The CCPA provides a right to notice at collection for certain California residents including current and former employees, owners/officers/directors, and contractors ("**Workforce**" or "**you**"); emergency contacts provided by Workforce; and individuals/dependents of Workforce whose Personal Information is provided to administer benefits.

#### **3.** What Information We Collect

As further described below, the company collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household ("**Personal Information**"). Personal Information **does not** include publicly available information from government records, deidentified information, or aggregated data.

In addition, Personal Information does not include information based on activities performed on company assets. **You do not own or have an expectation of privacy or rights under the CCPA** regarding:

- (a) Company information created, collected, or maintained on any technology assets owned, leased, or operated in whole, or in part, by the company. A-I's technology assets consist of all electronic devices, software, and means of electronic communication, including, but not limited to, computers and workstations, laptop computers, computer hardware, as well as computer software applications, associated files, and data that grant access to services like the internet, email, phone, voicemail, and instant messages. All information created, collected, or maintained by the company's technology assets is company property and provided to you solely for your use in conducting company business.
- (b) Company information A-1 collects when monitoring premises, equipment, devices, computers, network, applications, software, or similar company assets and resources, to protect its worksites, employees, and computer systems.

#### 3.1. Categories of Personal Information

The following discusses the categories of Personal Information we collected in the last twelve (12) months. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different purposes without first providing you notice.

- **Personal Identifiers.** We collect your name, driver's license or ID number, social security number, email address, phone number, and mailing address from you during our application and onboarding processes and if you update your information with us.
- Characteristics of Protected Classifications Under California or Federal Law. We may collect your date of birth, age, gender identity, sexual orientation, racial or ethnic origin, disability information, genetic information, marital status, or pregnancy and related information, if you provide this information as part of your application, during onboarding, or while working at A-1.
- Audio, Visual, or Similar Information. We may collect information that may be used to identify you to other employees or customers, such as your photograph or voice recording.
- **Geolocation.** If you use your personal device to access our network, we may collect information such as your GPS coordinates and location.
- Internet and Network Information. In some circumstances, such as when you access the network on your personal device, we may collect your IP address and cookie data.
- **Professional or Employment-Related Information.** We collect information related to your employment history during the application process. Additionally, we collect information from you during your employment with us, such as your work attendance and dates of employment.
- **Education Information.** We collect your education history from you as part of your application or if you update your information with us.
- **Financial Information.** We collect financial information, including when you provide us your bank account information to process payroll.
- **Health Insurance Information.** We collect health insurance information such as your policy number, coverage information, worker's compensation, requests for disability accommodation, or any similar request.
- **Medical Information.** To the extent permitted and required by applicable laws, we may collect information about your medical and treatment history, diagnosis, dates of service, provider name, and your ability to work.
- **Inferences.** We may collect inferences drawn from the foregoing information such as your characteristics, preferences, aptitudes, or behaviors.

#### **4.** How We Use the Information We Collect

We use the Personal Information we collect for the following business and commercial purposes:

# A-1 Self Storage

- **Onboarding.** We use Personal Information to complete new hire paperwork, enroll you in our HR system, and set up your personnel file.
- **Benefits.** We use the Personal Information we collect to create benefits packages and, if eligible, provide you rewarding employee benefits.
- **Payroll.** We use Personal Information to manage and pay you for services provided.
- Leave and Accommodation Requests. We use the Personal Information we collect to evaluate and process time off, sick leave, leaves of absence, or accommodation requests, if you make such requests.
- **Training, Performance Reviews, and Goals Monitoring.** We use the Personal Information we collect to provide you with relevant training, conducive feedback, and to support your career development.
- **Business Operations.** We use Personal Information to guide our recruiting, hiring, and onboarding efforts, maintain files, and support our business operations.
- Security and Crime Prevention. We take several measures to ensure our facilities and networks are secure, such as by monitoring access to the network. Government Reporting. We use the information we collect to comply with applicable laws.

# 5. Additional Rights Under California Law

At this time, the CCPA does not afford you the right to make requests regarding your Personal Information. A-1 will inform you about any policies and procedures related to such rights if they become available. Other rights to inspect and access certain payroll and employment records remain available pursuant to the Labor Code.

# 6. How We Retain Your Personal Information

To the extent permitted by applicable law, A-1 will retain your Personal Information for as long as reasonably necessary to fulfill the purposes for which it was collected, including to meet any legal, accounting, or other reporting requirements or obligations.

# **7.** How You Are Protected Against Discrimination

A-1 will not unlawfully discriminate against you for exercising any of your rights under the CCPA. This commitment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee of A-1, including supervisors and coworkers.

#### **8.** How Other A-1 Policies & Disclosures Apply

This Notice is in addition to the policies and disclosures found in the Employee Handbook. If you are unsure whether this Notice applies to you, please contact Human Resources.



# 9. Disclaimer

Nothing in this Notice restricts A-1's ability to:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law;
- Exercise or defend legal claims;
- Detect security incidents and protect against fraudulent or illegal activity and prosecute those responsible for such activity; or
- Transfer Personal Information as part of a merger or acquisition, dissolution, bankruptcy, or any other transaction in which a third party assumes control of all or part of A-1.

# **10.** Changes to This Notice

This Notice is reviewed and updated annually to ensure it accurately captures our practices and procedures. The effective date of this version is posted below.

#### **11.** Resolving Concerns and How to Contact Us

If you have questions or concerns regarding this Notice or the handling of your Personal Information, please contact us at hr@castergrp.com or 619-287-8873.

#### EFFECTIVE DATE: January 29, 2021