

# White Cap Supply Holdings, LLC California Human Resources Privacy Notice

Last Updated: December 23, 2022

This Privacy Notice ("**Privacy Notice**") describes how White Cap Supply Holdings, LLC and its subsidiaries (together, "**White Cap**" or "**we**" or "**us**" or "**our**") collect, use, and disclose the Personal Information we collect from or about you in the context of your role as a California-based associate, officer, contractor, or other staff member of White Cap. This Privacy Notice contains general information about our collection, use, and disclosure of Personal Information, including such activities in the last 12 months.

Please note that this Privacy Notice does not apply to information collected when you visit [www.whitecap.com](http://www.whitecap.com) or other White Cap-operated websites. Information collected on these websites is governed by the publicly available White Cap [Privacy Notice](#).

## How We Collect and Use Your Personal Information

"**Personal Information**" is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household, such as your name, email address, IP address, telephone number, and broader categories of information such as your professional, educational, or health information, commercial information, and internet activity.

We may collect Personal Information directly from you and automatically through your use of White Cap devices, systems, and facilities. We may also collect your Personal Information from third-party sources, such as character references, background check service providers, and other associates. We will treat Personal Information collected from third-party sources in accordance with this Privacy Notice.

We may collect the following categories of Personal Information about you in the context of your employment or other similar relationship with us:

- **Identifiers**, such as your name, postal address, phone number, email address, photograph, government-issued ID (such as your social security number, visa and passport information, and work/residence permits), access right data including physical ID cards and IT credentials, associate ID numbers, and other similar identifiers. We may collect this information to verify your identity and information, to communicate with you, and to enable your employment with White Cap.
- **Records Information**, such as information about your preferences and characteristics, your health and health insurance information, and information about your beneficiaries.
- **Protected Characteristics**, provided with special protection under California law, such as your age, race, citizenship, gender, medical information, and disability information.

- **Professional and Employment-Related Information**, such as information about your title and compensation history, current and former employment, professional degrees and certifications, education background, background check information (including criminal history), benefits and leave information, performance and disciplinary information, information related to training and skills development, information related to health and safety, information related to any legal issues or disputes that may arise, certain Identifiers (in order to contact you), time-clock data, and other employment-related information, including your employment goals and objectives.
- **Financial Information**, such as your financial account information. We may collect this information to facilitate your compensation.
- **Commercial Information**, such as your consumer history. We may collect this information to provide certain employee benefits to you.
- **Internet or other Electronic Activity Information**, such as your use of your work email account, the internet (including your browsing history and search history), and our computers, phones, and other devices to which you have access. We may collect this information to provide IT services.
- **Geolocation data**, such as the precise location of your home and office or the GPS of the company vehicle you are driving. We may collect this information for the purpose of providing access to an office or facilitating interactions with you.
- **Audio, Electronic, Visual, or Similar Information**, such as security video when you visit our premises or recording from when you communicate with us through audio, visual, or other electronic means.

In addition to the purposes for collection described above, we also may collect each category of information for the purposes of maintaining our relationship with you, maintaining employment-related information, ensuring security and integrity, verifying or maintaining the quality or safety of a product or service, and/or performing services on behalf of the business, which include:

- Associate onboarding and access to our administrative and IT systems.
- Personnel administration, such as identity verification, tax and social security management, scheduling, establishing emergency contact information, or processing associate/personnel work-related claims.
- Benefits processing, including determining eligibility for you and your dependents and beneficiaries.
- Payroll, salary/sick pay, and leaves of absences.
- Protecting the health and safety of our personnel, clients, guests, and the general public.
- Training, performance reviews, and evaluations.
- Monitoring the use of IT and other equipment and property for security purposes, to protect against fraud, and to ensure compliance with our policies and procedures.
- Complying with our legal obligations under federal and state employment laws.
- Our own internal business purposes, including performing analytics and applying algorithms to discover ways to improve our business, identify trends in our workforce, and enhance our service offerings.
- For other purposes consistent with the context of the collection of your information, or as otherwise disclosed to you prior to the use of your information.

Some of the information we collect may be considered **Sensitive Personal Information** under privacy laws, such as your health information and account log-in information. We use your Sensitive Personal Information only for legitimate business purposes, including to (i) perform services or provide goods reasonably expected by an average staff member in your position; (ii) detect security incidents; (iii) resist malicious, deceptive, or illegal actions; (iv) ensure the physical safety of individuals; (v) for short-

term, transient use, including non-personalized advertising; (vi) perform or provide internal business services; or (vii) verify or maintain the quality or safety of a service or device.

## How We Disclose Your Personal Information

We may share the categories of Personal Information described above in the following circumstances to the following categories of third parties:

- We may share your Personal Information with companies or individuals we contract with in order to receive services (our **"Service Providers"**). These services may include, among other things, providing background check services, associate benefits services, and Human Resources (**"HR"**) and Information Technology (**"IT"**) capabilities. Our policy is to inform our Service Providers not to use or disclose your Personal Information for any purpose other than for providing services to us.
- We may share your Personal Information with companies that we own or control or are owned or controlled by (our **"Corporate Family"**).
- We may share your Personal Information with companies or individuals outside of White Cap who may use your Personal Information for their own purposes (a **"Third Party"**). For example:
  - From time to time, we may be required to provide Personal Information to a Third Party in response to a court order, subpoena, government investigation, or as otherwise required by law or legal process.
  - We may disclose your Personal Information with Third Parties, such as law enforcement agencies, other government agencies, or health authorities (i) when we, in good faith, believe you or others are acting unlawfully; (ii) when we believe it is necessary or appropriate to satisfy any law, regulation, or other governmental request; (iii) to operate our business and websites properly; (iv) to protect or defend our rights or the rights or well-being of our users, even without a subpoena, warrant, or court order; or (v) we believe disclosure is necessary to protect the health and safety of our personnel, clients, guests, and the general public.
  - We may disclose your Personal Information to enforce or apply agreements we have with you.
- We may, as a result of a sale, merger, consolidation, change in control, transfer of assets, reorganization, or liquidation of our company (a **"Reorganization Event"**), transfer or assign your Personal Information to parties involved in the Reorganization Event. You acknowledge that such transfers may occur and are permitted by and subject to this Privacy Notice.
- We may disclose information to third parties where we have received your consent for doing so.

We do not sell your Personal Information covered under this Privacy Notice, and we are not aware of any sales of Personal Information pertaining to children under 16. We do not share your Personal Information covered under this Privacy Notice for targeted advertising purposes.

## Your Rights

As a California resident, you may request to exercise the following rights (subject to legal exemptions):

- **The right to know.** You may have the right to know and access your Personal Information, such as the categories of Personal Information we have collected, the sources of Personal Information, and purposes of collection, and how we used, disclosed, sold, or shared Personal Information.

- **The right to correct.** You may have the right to correct inaccurate Personal Information that we maintain about you.
- **The right to deletion.** You may have the right to delete your Personal Information under specific circumstances.

You may exercise your rights under this section by contacting us 800-944-8322 or [privacyinquiry@whitecap.com](mailto:privacyinquiry@whitecap.com). If you choose to exercise any of these rights, White Cap will not discriminate against you in any way. If you exercise certain rights, understand that you may be unable to use or access certain features of White Cap's services, which may include employment benefits.

We will take steps to verify your identity before processing certain requests. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the individual about whom we collected Personal Information. If you have an account with us, we will use our existing account authentication practices to verify your identity. If you do not have an account with us, we may request additional information about you to verify your identity. We will only use the Personal Information provided in the verification process to verify your identity or authority to make a request and to track and document request responses, unless you initially provided the information for another purpose.

You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent's request, we may verify both your and your agent's identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.

You may have a right to appeal any denials of your request to exercise your rights. If we deny your request and you would like to submit an appeal, please contact us as described in "**Questions about Our Privacy Notice**" below.

## Data Security and Retention

We may retain your Personal Information it as reasonably required to serve you, run our business, and comply with our legal obligations. In determining when your Personal Information is retained or disposed, we may consider the nature and sensitivity of your Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information, and applicable legal requirements.

We maintain reasonable administrative, technical, and physical safeguards to protect against unauthorized access, disclosure, alteration, or destruction of the Personal Information we collect under this Privacy Notice. However, you should keep in mind that no data storage or processing activity is ever completely secure or error-free. While we endeavor to safeguard your Personal Information, White Cap cannot and does not ensure or warrant the security of your Personal Information.

## Questions about Our Privacy Notice

If you have questions about this Privacy Notice, please contact the Human Resources Department at [LELawCompliance@whitecap.com](mailto:LELawCompliance@whitecap.com).

# Changes to Our Privacy Notice

We may occasionally update this Privacy Notice to reflect changes in our practices. When we post modifications to this Privacy Notice, we will revise the "Last Updated" date at the top of this Privacy Notice. If the changes are material, we will endeavor to notify you in advance of such changes taking place.

We encourage you to periodically review this page for the latest information on our privacy practices.