

Davies Group Ltd.: HR Privacy Notice for California Residents

Last Updated: April 06, 2023

This HR Privacy Notice for California Residents (“HR Privacy Notice”) describes the types of personal information we collect about California residents who are (1) Davies Group Ltd. (“Davies”) employees, owners, directors, officers and contractors (collectively, “Davies Personnel”), (2) emergency contacts of Davies Personnel, and (3) individuals related to Davies Personnel for whom Davies administers benefits (collectively with Davies Personnel, “HR Covered Individuals”).

Davies Personnel are responsible for providing this HR Privacy Notice to any HR Covered Individual whose personal information is provided to Davies by Davies Personnel. Certain terms used in this Notice have the meanings given to them in the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and its implementing regulations (collectively, the “CCPA”).

Notice of Collection and Use of Personal Information

Davies may collect (and may have collected during the 12-month period prior to the Last Updated date of this HR Privacy Notice) the following categories of personal information about HR Covered Individuals:

- **Identifiers:** identifiers, such as a real name, alias, postal address, unique personal identifier (e.g., a device identifier, employee number, unique pseudonym, or user alias/ID), telephone number, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, date of birth, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number and debit card number, and other financial information, medical information, and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites or applications
- **Sensory Information:** audio, electronic, visual, and similar information

- **Employment Information:** professional or employment-related information, such as compensation, benefits and payroll information (e.g., salary-related information, tax-related information, benefits elections and details regarding leaves of absence), information relating to your position (e.g., job title and job description), performance-related information (e.g., evaluations and training), talent management information (e.g., resumé information, occupation details, education details, certifications and professional associations, historical compensation details, previous employment details, and pre-employment screening and background check information, including criminal records information), emergency contact information, and dependent information
- **Education Information:** education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Davies may use (and may have used during the 12-month period prior to the Last Updated date of this HR Privacy Notice) personal information for the purpose of carrying out and supporting HR functions and activities, including the uses described below. In addition to general HR purposes, we list below relevant “business purposes” as they are described in the CCPA.

- Managing work activities and personnel generally, including recruiting; performing background checks; determining suitability for employment or promotion; determining physical and/or mental fitness for work; managing Davies Personnel onboarding; reviewing and evaluating performance; determining eligibility for and processing salary increases, bonuses, and other incentive-based compensation; providing references; managing attendance, absences, leaves of absences, and vacations; administering payroll services; reimbursing expenses; administering health, dental, and other benefits; accommodating disabilities or illnesses; training and talent development; facilitating employee relocations and international assignments; making travel arrangements; securing immigration statuses; monitoring staff; creating staff directories; managing Davies Personnel headcount, work planning, and office allocation; investigating suspected misconduct or non-performance of duties; managing disciplinary matters, grievances, and terminations; reviewing staffing decisions; providing access to facilities; managing communications and relations with HR Covered Individuals; and carrying out obligations under employment contracts.
- Ensuring business continuity; protecting the health and safety of our staff and others; safeguarding, monitoring, and maintaining our IT infrastructure, office equipment, facilities, and other property; providing technical support; detecting or preventing theft or fraud, or attempted theft or fraud; and facilitating communication with you and your designated contacts in an emergency.

- Operating and managing our IT, communications systems and facilities, and monitoring the use of these resources; performing data analytics; improving our services; allocating and managing company assets and human resources; strategic planning; project management; compiling audit trails and other reporting tools; maintaining records relating to business activities, budgeting, and financial management; managing mergers, acquisitions, sales, reorganizations or disposals and integration with business partners.
- Complying with legal requirements, such as tax, record-keeping and reporting obligations; conducting audits, management and resolution of health and safety matters; complying with requests from government or other public authorities; responding to legal process such as subpoenas and court orders; pursuing legal rights and remedies; defending litigation and managing internal complaints or claims; conducting investigations; and complying with internal policies and procedures.
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing analytics services, providing storage, or providing similar services.
- Auditing, including auditing compliance.
- Certain short-term, transient uses.
- Helping to ensure security and integrity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance them.

Davies does not collect or process sensitive personal information with the purpose of inferring characteristics about HR Covered Individuals.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

Retention of Personal Information

We will retain personal information about HR Covered Individuals for the time period reasonably necessary to achieve the purposes described in this HR Privacy Notice, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

Sources of Personal Information

During the 12-month period prior to the Last Updated date of this HR Privacy Notice, Davies may have obtained personal information about HR Covered Individuals from the following categories of sources:

- Directly from you;
- Your devices;
- Family or friends who provide information about you, for example, in connection with our provision of benefits or services;
- Our affiliates and subsidiaries;
- Service providers, contractors and other vendors who provide services on our behalf;
- Customers or business partners who provide information about you, such as when they provide feedback;
- Internet service providers (“ISPs”);
- Operators systems and platforms;
- Government entities;
- Social networks; and
- Data brokers, such as credit bureaus, credit reporting service providers and background check services.

Disclosure of Personal Information

During the 12-month period prior to the Last Updated date of this HR Privacy Notice, Davies may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

Category of Personal Information	Categories of Third Parties
Identifiers	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services
Additional Data Subject to Cal. Civ. Code § 1798.80	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services
Protected Classifications	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners

	<ul style="list-style-type: none"> • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services
Online Activity	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services
Sensory Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services
Employment Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services
Education Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services
Inferences	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf • Customers or business partners • ISPs and operating systems and platforms • Data brokers, such as credit bureaus, credit reporting service providers and background check services

In addition to the categories of third parties identified above, during the 12-month period prior to the Last Updated date of this HR Privacy Notice, we may have disclosed personal information about HR Covered Individuals to government entities and third parties in connection with corporate transactions, such as mergers, acquisitions or divestitures.

Davies does not sell or share for cross-context behavioral advertising purposes personal information about HR Covered Individuals.

California Consumer Privacy Rights

If you are an HR Covered Individual, you have certain choices regarding your personal information, as described below.

- **Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed, and sold or shared about you.
- **Correction:** You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.
- **Deletion:** You have the right to request that we delete certain personal information we have collected from you.

How to Submit a Request. To submit an access, correction or deletion request, please download the California Data Subject Request form and email a completed form to us at: usprivacy.dpo@us.davies-group.com with the subject line “**CCPA Request**” or call us at **(800) 490-5759**. To submit a request as an authorized agent on behalf of an HR Covered individual, please download the California Data Subject Request form and email a completed form to us at email us at: usprivacy.dpo@us.davies-group.com

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. We may verify your identity by requiring you to sign into your Davies company account. If you do not have a Davies company account and you request access to, correction of or deletion of your personal information, we may require you to authenticate your email address and provide information about your employment dates with Davies, prior payments from Davies, prior correspondence with Davies or other details about your work for or relationship to Davies. In addition, if you do not have a Davies company account and you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the HR Covered Individual whose personal information is the subject of the request.

Additional Information. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

How To Contact Us

If you have any questions regarding this HR Privacy Notice for California Residents or our privacy practices, please contact us at usprivacy.dpo@us.davies-group.com.