

# WORKFORCE PRIVACY NOTICE

**Effective Date: June 16, 2023**

**Last Updated: October 3, 2023**

The Privacy Notice describes how Klimisch Collision, LLC (“us,” “we,” and “our”) process personal information collected in the course of, or in connection with your employment with us or work for us as a contractor. Please read it carefully.

If you have any questions, please contact us as provided below. You may download a copy of this Workforce Privacy Notice by clicking [here](#). If you have a disability and need to receive this Workforce Privacy Notice in a different format, please contact us at [privacy-coordinator@gandcautobody.com](mailto:privacy-coordinator@gandcautobody.com).

## Categories of Personal Information We Collect

We collect, and in the preceding 12 months have collected, the below categories and types of personal information with your consent or as otherwise required or permitted by law. Where provided by you, we may also collect this information about your dependents/beneficiaries.

- **Contact Information.** We collect your full name, email address, current and prior address, telephone number, employee number, and business contact information. We may also collect this information for your emergency contacts and references.
- **Identifiers.** We collect social security number, driver’s license number, government issued ID number, state identification card number, passport number, tax identification number, signature, and vehicle license plate number or VIN.
- **Personal Characteristics or Traits.** We collect date of birth, gender, age, nationality, racial or ethnic origin, marital status, citizenship status, sexual orientation, military or veteran status, disability information, pregnancy and related information, if you provide this information as part of your application, during onboarding, or while working for us.
- **Financial Information.** We collect bank account number and payroll records.
- **Audio/Visual Data.** We collect audio, electronic, visual, photographic, or similar data including audio messages and text messages.
- **Biometric Information.** If you use our timeclock system, we will collect your photograph.
- **Professional or Employment Information.** We collect employment history, resume, references, date of hire or resignation, offer letters, emergency contact, records of promotions or transfers, pension plan records, agreements, and/or enrollment forms.
- **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. Additionally, we may collect information about physical screenings or drug test results, if your application or position required such screenings or testing you are involved in a work-place injury or accident.

- **Health Insurance Data.** We collect health insurance information including your policy number, insurance application information, claims history, health insurance group ID, health insurance plan member ID, and spouse or dependent information, if applicable.
- **Sensitive Personal Information.** We may collect social security number, driver’s license number, passport number, government issued ID number, photograph, state identification card number, racial or ethnic origin, religious or philosophical beliefs, union membership, and health and medical information.

## Sources Of Personal Information

We collect, and in the preceding 12 months have collected, personal information in the following ways:

- **Directly from you.** We collect contact information, identifiers, personal characteristics or traits, financial information, audio/visual data, professional or employment information, health insurance information, medical information, and sensitive personal information that you provide directly to us.
- **When you visit our locations.** We collect audio/visual data from security cameras at our facilities.
- **From third parties:** We may collect contact information, identifiers, financial information, personal characteristics or traits, audio/visual data, health insurance information, medical information, sensitive personal information, and professional or employment information from third-parties including recruiters, vendors, service providers and your references.
- **From other employees or job applicants.** We may collect contact information, identifiers, financial information, personal characteristics or traits, health insurance information, medical information, sensitive personal information, and professional or employment information from our current or former job applicants, contractors and employees.

## Purposes for Collecting Personal Information

We use your personal information for the following purposes:

- **Background, Credit, or License Checks.** We may require our applicants, and in certain circumstances our employees, to complete a background check to verify your identity, check for criminal history, check your credit worthiness, and confirm the validity of your driver’s license. We use identifiers, personal characteristics or traits, professional or employment information, and sensitive information to enable the completion of the background check.
- **Onboarding.** We use contact information, identifiers, personal characteristics or traits, audio/visual data, professional or employment information, non-public education information, medical information, and sensitive personal information to complete new hire paperwork, enroll you in our human resource management system, collate company directories and provide communication services, provide you access to our offices and IT systems and set up your personnel file.
- **Benefits.** We use contact information, identifiers, personal characteristics or traits, audio/visual data, professional or employment information, medical information, health insurance information, and sensitive personal information to create benefits packages and provide and administer employee benefits.

- **Payroll.** We use contact information, identifiers, financial information, audio/visual data, biometric data, and sensitive personal information to track your time and attendance and absences, confirm you are using our timeclocks appropriately, and to pay you and reimburse you for professional expenses.
- **Leave and Accommodation Requests.** We use contact information, identifiers, personal characteristics or traits, professional or employment information, health insurance information, medical information, and sensitive personal information to evaluate and process time off, sick leave, leaves of absence, or accommodation requests, if you make such requests.
- **Performance and Talent Management.** We use contact information, identifiers, biometric information, audio/visual data, sensitive information, and professional or employment information for performance and talent management, training and leadership development, disciplinary and grievance procedures, awards/recognition, employee surveys, and to support your career development.
- **Business Operations.** We use contact information, identifiers, financial information, personal characteristics or traits, audio/visual data, biometric information, health insurance information, medical information, sensitive personal information, and professional or employment information for guiding our recruiting, hiring, and onboarding efforts, maintaining records, planning, budgeting, calibration, headcount, database administration, diversity metrics, surveys, evaluations, reports, legal claims, compliance, regulatory, audit, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting tools, and support our business operations.
- **Analytical Purposes.** We may use identifiers, personal characteristics or traits, biometric information, professional or employment information, and sensitive personal information to analyze trends and statistics, better understand our workforce, prevent discrimination in the workplace and/or to respond to allegations or claims.
- **Security and Fraud Prevention.** We use contact information, identifiers, financial information, personal characteristics or traits, audio/visual data, biometric information, health insurance information, medical information, sensitive personal information, inferences, and professional or employment information to: (i) protect our Site, premises, assets, systems, products, services and intellectual property; (ii) protect us our employees, our carriers and others from fraud, theft and other misconduct; (iii) enforce our policies; and (iv) detect and prevent fraud, theft and misconduct including by verifying the identity of those we are conducting business with.
- **Legal:** We use contact information, identifiers, financial information, personal characteristics or traits, audio/visual data, biometric information, health insurance information, medical information, sensitive personal information, inferences, and professional or employment information to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes:** We may use contact information, identifiers, financial information, personal characteristics or traits, audio/visual data, biometric information, health insurance information, medical information, sensitive personal information, inferences, and professional or employment information for other reasons we may describe to you.

## How We Disclose Personal Information

We share personal information in the following circumstances or as otherwise described in this Privacy Notice:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our services, website, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting, payment processing, order fulfillment, email delivery, marketing, insurance, operating systems and platforms, transportation, and customer support services). In some cases, such as payment processors, the vendor or service provider may directly collect the information from you on our behalf. In the 12 months preceding the effective date of this policy, we have disclosed contact information, identifiers, financial information, personal characteristics or traits, audio/visual data, biometric information, health insurance information, medical information, sensitive personal information, inferences, and professional or employment information to our service providers.
- **Professional Advisors.** We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us. In the 12 months preceding the effective date of this policy, we have disclosed contact information, identifiers, financial information, personal characteristics or traits, medical information, sensitive personal information, and professional or employment information to our professional advisors.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us. In the 12 months preceding the effective date of this policy, we have disclosed contact information, identifiers, personal characteristics or traits, medical information, sensitive personal information, and professional or employment information to government entities.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **With Your Consent or At Your Direction.** We may share information with third parties whenever you consent to or direct such sharing.
- **Other Reasons.** We may share information for other reasons we may describe to you.

## How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If you wish to request that we no longer use your information to provide you services or products, please contact us at [privacy-coordinator@gandcautobody.com](mailto:privacy-coordinator@gandcautobody.com).

We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- the duration of your employment with us;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data, and
- what the expectation for retention was at the time the data was provided to us.

## Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

## California Privacy Rights

This section applies to you if you are a resident of the state of California.

**Shine The Light.** The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third-parties' direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at [privacy-coordinator@gandcautobody.com](mailto:privacy-coordinator@gandcautobody.com) and include "CA Shine the Light" in the subject line of your email.

### California Consumer Privacy Act ("CCPA").

This section applies to our privacy practices as required under the California Consumer Privacy Act, including as amended by the California Privacy Rights Act (together, the "CCPA").

Sale or Sharing of Personal Information. We do not sell or share, and in the preceding 12 months, we have not "sold" or "shared" (as those terms are defined in the CCPA) the personal information of our workforce or the personal information of minors under the age of 16.

Use or Disclosure of Sensitive Personal Information. In the preceding 12 months, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California residents the following rights:

- You have the right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you.
- You have the right to opt-out of the sale or sharing of your personal information.
- You have the right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

Exercising Your Rights. To exercise any of your rights, please use our call us toll free at (877) 721-5057 or use our [webform](https://klimischcollision.com/contact/consumer-rights-request/) which is available on our website at <https://klimischcollision.com/contact/consumer-rights-request/>. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided to us. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [privacy-coordinator@gandcautobody.com](mailto:privacy-coordinator@gandcautobody.com).

## Contact Us

If you have any questions about this Policy or our data practices, please email us at [privacy-coordinator@gandcautobody.com](mailto:privacy-coordinator@gandcautobody.com).

## Updates to This Privacy Notice

This Privacy Notice is reviewed and updated annually to ensure that it accurately captures our practices and procedures. We will notify you of any material changes to this Privacy Notice as required by law. The “Last Updated” legend above indicates when this Privacy Notice was last revised. Any revised Privacy Notice will become effective immediately upon posting to any website, internal location, or other distribution.