

NOTICE AT COLLECTION

The purpose of this Notice at Collection is to provide you with timely notice, at or before the point of collection, about the categories of personal information to be collected from you and the purpose for which the personal information will be used.

General Personal Information

Do We collect?	Categories of Personal Information	Purposes for Collection	Retention Policy
<input checked="" type="checkbox"/>	Identifiers: For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations • Recruit and evaluate job applicants and candidates for employment • Conducting background and reference checks • Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes. 	We retain your information during the time we have an ongoing relationship with you. Our internal uses and retention for personal information varies by department and certain business units. We retain your information as reasonably necessary and proportionate to the purpose for which each category of information was collected and will be processed. Records, or portions thereof may be deleted when there is no longer a legal, compliance, or business purpose to retain your information. We retain all personal information for at least 3 years and can retain certain information for as long as 10 years, which may be longer depending on the circumstances.
<input checked="" type="checkbox"/>	Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, name, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, medical information, or health insurance information.	<ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. 	
<input checked="" type="checkbox"/>	Characteristics of CA or Federal Protected Classifications: For example, race, religion, national origin), age (40 and over), gender, medical condition,		

	familial status, disability, or veteran status.		
☑	Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement	<ul style="list-style-type: none"> • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Clayton Industries (“Clayton”) policies and procedures. • Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Clayton. • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance • Perform workforce analytics, data analytics, and benchmarking. • Administer and maintain Clayton's operations, including for safety purposes. • To promote our products/services and employee subject matter expertise • Exercise or defend the legitimate business interests and legal rights of Clayton and its employees 	
☑	Sensory or Surveillance Data: For example, audio, electronic, visual, or similar information that can be linked or associated with a particular consumer or household		
☑	Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files and current and past job history.		
☑	Profile Data: For example, information about your behavior and aptitudes.		

Sensitive Personal Information

Do We collect?	Categories of Sensitive Personal Information	Purposes for Collection	Retention Policy
☑	Social Security Number, Driver's License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations • Recruit and evaluate job applicants and candidates for employment 	<p>We retain your information, at minimum, during the time an individual is employed with us or an applicant who is interviewing for a position with Clayton. Our internal uses and retention for your information varies by department and certain business units. We retain your information as reasonably necessary and proportionate to the purpose for which each category of information was collected and will be processed. Employment records, or portions thereof may be deleted when there is no longer a legal, compliance, or business purpose to retain your information. We retain all personal information for at least 3 years and can retain certain information for as long as 10 years, which may be longer depending on the circumstances.</p>
☑	Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> • Conducting background and reference checks • Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes. 	
☑	Racial or ethnic origin, religious or philosophical beliefs, or union membership	<ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. 	
☑	Genetic data	<ul style="list-style-type: none"> • Conduct internal audits and workplace investigations. 	
☑	Health information	<ul style="list-style-type: none"> • Investigate and enforce compliance with and potential breaches of Clayton policies and procedures. • Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Clayton. 	

		<ul style="list-style-type: none"> • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance • Perform workforce analytics, data analytics, and benchmarking. • Administer and maintain Clayton's operations, including for safety purposes. • To promote our products/services and employee subject matter expertise • Exercise or defend the legitimate business interests and legal rights of Clayton and its employees 	
--	--	---	--

We will not collect additional categories of personal information without providing you a new Notice at Collection disclosing those categories.

Clayton does not sell your personal information to third parties or share information with third parties for cross context behavioral advertising.

Clayton's privacy policy is found here <https://www.claytonindustries.com/careers-clayton-industries/>

PRIVACY POLICY

The purpose of this privacy policy is to provide you with a comprehensive description of Clayton Industries' ("Clayton") online and offline practices regarding the collection, use, disclosure, retention, sharing, and sale of personal information and of your rights regarding your personal information.

Your Right to Know

You have the right to request any of the following:

- the categories of personal information we have collected about you.
- the categories of sources from which the personal information is collected.
- the business or commercial purpose for collecting your personal information.
- the categories of third parties to whom we disclose personal information.
- the specific pieces of personal information we have collected about you.

You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

The following table includes disclosures for the preceding 12 months of: categories of personal information we have collected about you as a job applicant or employee, the categories we have disclosed for a business purpose, and categories of third parties with whom we shared the personal information during that period.

General Personal Information

Category	In the preceding 12 months this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom the information was disclosed
	Collected	Disclosed		
Identifiers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations • Recruit and evaluate job applicants and candidates for employment • Conducting background and reference checks • Manage your employment 	<ul style="list-style-type: none"> • Within Clayton: Personal Information will be shared with people within Clayton who have a "need to know" the information in connection with the recruitment and hiring process.
Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Characteristics of CA or Federal Protected Classifications	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Internet or Other Similar Network Activity	☑	☑	<p>relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes.</p> <ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Clayton policies and procedures. • Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Clayton. • Maintain commercial insurance policies and coverages, including for workers' compensation and 	<ul style="list-style-type: none"> • Service Providers: Clayton uses third-party service providers to assist with the recruitment process, including the collection, processing, and validation of Personal Information. For example, payment processing for direct deposits and processing an employee's benefits or expenses. We do not allow our third-party service providers to use your data for their own purposes. We only permit them to process it for specified purposes and in accordance with our instructions, and they are required to keep it confidential.
Geolocation Data	☑	☑		
Sensory or Surveillance Data	☑	☑		
Profile Data	☑	☑		

			<p>other liability insurance</p> <ul style="list-style-type: none"> • Perform workforce analytics, data analytics, and benchmarking. • Administer and maintain Clayton's operations, including for safety purposes. • To promote our products/services and employee subject matter expertise • Exercise or defend the legitimate business interests and legal rights of Clayton and its employees 	
--	--	--	---	--

Sensitive Personal Information

We do not use or disclose the below sensitive personal information of employees or applicants for purposes beyond the minimum purposes specified under CCPA.

Category	In the preceding 12 months this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom the information was disclosed
	Collected	Disclosed		
Social Security Number, Driver's License, State Identification Card, or Passport Number	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations • Recruit and evaluate job applicants and candidates for employment • Conducting background 	<ul style="list-style-type: none"> • Within Clayton: Personal Information will be shared with people within Clayton who have a "need to know" the information in connection with the recruitment and hiring process. • Service Providers: Clayton uses third-party service providers to assist with the
Account log-in, financial account,	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

<p>debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account</p>			<p>and reference checks</p> <ul style="list-style-type: none"> • Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes. • Manage and monitor employee access to company facilities, equipment, and systems. • Conduct internal audits and workplace investigations. • Engage in corporate transactions requiring review of 	<p>recruitment process, including the collection, processing, and validation of Personal Information. For example, payment processing for direct deposits and processing an employee's benefits or expenses. We do not allow our third-party service providers to use your data for their own purposes. We only permit them to process it for specified purposes and in accordance with our instructions, and they are required to keep it confidential.</p>
<p>Racial or ethnic origin, religious or philosophical beliefs, or union membership</p>	<p><input checked="" type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>		
<p>Genetic Data</p>	<p><input checked="" type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>		
<p>Health Information</p>	<p><input checked="" type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>		

			<p>employee records, such as for evaluating potential mergers and acquisitions of Clayton.</p> <ul style="list-style-type: none">• Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance• Perform workforce analytics, data analytics, and benchmarking.• Administer and maintain Clayton's operations, including for safety purposes.• To promote our products/services and employee subject matter expertise• Exercise or defend the legitimate business interests and legal rights of Clayton and its employees	
--	--	--	--	--

The categories identified as collected in the tables above were collected from the following categories of sources:

- Information from you that you directly provide to us.
- Information from you that you provide passively from your use of our sites and services.
- Information about you from third party sources: We collect this information from sources including consumer data resellers.

Selling to Third Parties or Sharing with Third Parties for Cross-Context Behavioral Advertising

We do not sell your personal information to third parties or share information with third parties for cross context behavioral advertising. We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

Your Right to Request Correction of Inaccurate Personal Information

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information maintained by us. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used or maintained by us for the purpose of correcting your personal information and complying with our recordkeeping requirements under CCPA.

Please note that as a job applicant or employee, we may not be able to change or correct certain information about you.

We may deny your request if we have previously denied your same request to correct an alleged inaccuracy in the past six (6) months, unless you provide new or additional documentation that the information at issue is inaccurate.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

Your Right to Request Deletion of Your Personal Information

You have the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information, to correct information, or for deletion.

The response to a request to know will provide all personal information collected and maintained about you since January 1, 2022, unless doing so proves impossible or would involve

disproportionate effort. Please note that we are not required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You can submit requests using the following [online form](#) or by calling [toll-free \(833\) 931-0091](#). Your request will be verified using information you provide as described on the online form. If you [call \(833\) 93-0091](#) you will be asked to provide the same information requested on the web form for verification purposes.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will either treat it as if it had been submitted in accordance with our designated methods or provide you with information on how to submit the request or remedy any deficiencies.

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity.

If requests from you are manifestly unfounded or excessive in particular because of their repetitive character, we may either charge a reasonable fee or refuse to act on the request, notifying you of our reason for refusing to act. If we determine that the request warrants a fee, we will notify you of the reason for that determination and provide you with a cost estimate before completing your request.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

Using an Authorized Agent to Submit a Request

Only you, a person registered with the California Secretary of State, or a person you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to verify your identity directly by submitting a verified consumer request according to the procedures in the section "[Submitting a Verified Consumer Request](#)." If anyone purporting to be an authorized agent for a consumer contacts us, we will require proof that the authorized agent has been authorized to act on the consumer's behalf.

Opt-Out Preference Signals

Some website browsers have an "opt-out preference signal" feature that lets you tell other websites and businesses that you do not want to have your personal information sold or shared with third parties. We are not required under CCPA to process any opt-out preference signals because we do not sell personal information to third parties or share personal information with third parties for cross-contextual behavioral advertising.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

We will not discriminate against you for exercising any of your CCPA rights. We will not retaliate against you, as an employee, applicant for employment, or independent contractor.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on this page and update the notice's effective date.

Contact for More Information

If you have any questions or comments about this notice, the ways in which Clayton collects and uses your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (833) 931-0091

Online: [Request Form](#)