

# CCPA Notice at Collection for California Employees and Applicants

Luttrell Holdings, Luttrell Holdings II, dba Luttrell Staffing Group collects and uses your personal information, including sensitive personal information, for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance listed in the chart below. We are committed to properly handling the personal information collected or processed in connection with your employment relationship with us.

We will not sell the personal information, including any sensitive personal information, we collect about our employees or applicants for employment or share it with third parties for cross-context behavioral advertising.

| Personal Information Category   | Retention Period | Business Purpose  | Sold or Shared |
|---|------------------|---|----------------|
| Identifiers, such as your full name, contact information, gender, date of birth, signature, Social Security number, driver's license or state identification numbers, or similar information for your dependents and beneficiaries. | Four years       | <ul style="list-style-type: none"> <li>• Recruit and process employment applications, including verifying eligibility for employment and conducting background and related checks</li> <li>• Conduct employee onboarding</li> <li>• Maintain and administer payroll and employee benefit plans, including enrollment and claims handling</li> </ul> | Shared         |

|  |  |  |  |
|--|--|--|--|
|  |  | <ul style="list-style-type: none"> <li>• Maintain personnel records and complying with record retention requirements</li> <li>• Provide employees with human resources management services and employee data maintenance and support services</li> <li>• Communicate with employees and their emergency contacts and plan beneficiaries</li> <li>• Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws</li> <li>• Prevent unauthorized access to or use of the Company property, including information systems, electronic devices, network, and data</li> <li>• Ensure employee productivity and adherence to Company policies</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Company policy</li> <li>• Respond to law enforcement requests and as required by</li> </ul> |  |
|--|--|--|--|

|  |                   |   |               |
|--|-------------------|---|---------------|
|  |                   | <p>applicable law or court order</p> <ul style="list-style-type: none"> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul> |               |
| <p>California Customer Records employment and personal information, such as your name, signature, Social Security number, physical characteristics or description, photograph, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, current employment, employment history, membership in professional organizations, licenses and certifications, bank account number, credit card number, debit card number, or any other financial, medical or health insurance information.</p> | <p>Four years</p> | <ul style="list-style-type: none"> <li>• Same purposes as for identifiers category</li> </ul>   | <p>Shared</p> |
| <p>Protected classification characteristics under California or federal law, such as age (40</p>   | <p>Four years</p> | <ul style="list-style-type: none"> <li>• Comply with federal and state equal employment opportunity laws</li> </ul>   | <p>Shared</p> |

|  |  |   |           |
|--|--|---|-----------|
| <p>years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, reproductive health decision making, military and veteran status, or genetic information (including familial genetic information).</p> |  | <ul style="list-style-type: none"> <li>• Design, implement, and promote the Company's diversity and inclusion programs</li> <li>• Perform workforce analytics, data analytics, and benchmarking</li> <li>• Conduct internal audits, grievances, and suspected violations of Company policy</li> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul> |           |
| <p>Biometric information, such as facial recognition, fingerprints[, iris or retina scans][, keystroke][, or other physical patterns][, and certain wellness metrics].</p>   | <p>As long as reasonably necessary</p> | <ul style="list-style-type: none"> <li>• Timekeeping</li> <li>• Mobile phone access</li> <li>• Fingerprinting for a criminal background check after an initial offer of employment is made. Criminal background checks protect the company, mitigate risk, and avoid potential negligent hiring lawsuits</li> <li>• Administer and design health wellness programs</li> </ul>   | <p>No</p> |

|   |   |  |           |
|---|---|--|-----------|
|   |   | <ul style="list-style-type: none"> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul>   |           |
| <p>Internet or other similar network activity information, including all activity on the Company's information systems (such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames, and passwords) and all activity on communications systems (such as phone calls, call logs, voicemails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of company-issued devices).</p> | <p>As long as reasonably necessary.</p> | <ul style="list-style-type: none"> <li>• Facilitate the efficient and secure use of Company information systems</li> <li>• Ensure compliance with Company information systems policies and procedures.</li> <li>• Comply with applicable state and federal laws</li> <li>• Prevent unauthorized access to, use, or disclosure or removal of the Company's property, records, data, and information</li> <li>• Enhance employee productivity</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Company policy</li> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul> | <p>No</p> |

|   |                   |  |           |
|---|-------------------|--|-----------|
| <p>Geolocation data, such as the time and physical location related to use of an internet website, application, or device, and GPS location data from</p> | <p>Four years</p> | <ul style="list-style-type: none"> <li>• Improve safety of employees, customers, and the public regarding use of the Company property and equipment</li> </ul> | <p>No</p> |
|---|-------------------|--|-----------|

|  |  |   |  |
|--|--|---|--|
| <p>mobile devices of employees who participate in our vehicle reimbursement program.</p> |  | <ul style="list-style-type: none"> <li>• Prevent unauthorized access, use, or loss of the Company property</li> <li>• Improve efficiency, logistics, and supply chain management</li> <li>• Ensure employee productivity and adherence to the Company's policies</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company's policy</li> </ul> |  |
|--|--|---|--|

|   |                   |  |           |
|---|-------------------|--|-----------|
| <p>Sensory [and surveillance] data, such as COVID-19 related temperature checks and call monitoring and video surveillance.</p> | <p>Four years</p> | <ul style="list-style-type: none"> <li>• Comply with applicable state and federal laws, including on workplace health and safety</li> <li>• Prevent unauthorized access, use, or loss of the Company property</li> <li>• Improve customer service</li> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul> | <p>No</p> |
|---|-------------------|--|-----------|

|   |            |  |        |
|---|------------|--|--------|
| Professional or employment-related information, such as employment application information (work history, academic and professional | Four years | <ul style="list-style-type: none"> <li>Recruit and process employment applications, including verifying eligibility for employment, background checks, and onboarding</li> </ul> | Shared |
|---|------------|--|--------|

|  |  |  |  |
|--|--|--|--|
| <p>qualifications, educational records, references, and interview notes, background check, drug testing results, work authorization, performance and disciplinary records, salary, bonus, commission, and other similar compensation data, benefit plan enrollment, participation, and claims information, leave of absence information including religious, military and family obligations, health data concerning employee and their family members.]</p> |  | <ul style="list-style-type: none"> <li>Design and administer employee benefit plans and programs, including for leaves of absence.</li> <li>Maintain personnel records and comply with record retention requirements.</li> <li>Communicate with employees and their emergency contacts and plan beneficiaries.</li> <li>Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws.</li> <li>Prevent unauthorized access to or use of the Company's property, including its information systems, electronic devices, network, and data.</li> <li>Ensure employee productivity and adherence to the Company policies.</li> <li>Conduct internal audits and investigate</li> </ul> |  |
|--|--|--|--|

|  |                   |   |               |
|--|-------------------|---|---------------|
|  |                   | <p>complaints, grievances, and suspected violations of the Company policy.</p> <ul style="list-style-type: none"> <li>Evaluate and provide useful feedback about job performance, facilitate better working</li> </ul>  |               |
|  |                   | <p>relationships, and for employee professional development</p> <ul style="list-style-type: none"> <li>Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul>  |               |
| <p>Inferences drawn from other personal information to create a profile or summary, for example, an individual's preferences, abilities, aptitudes, and characteristics.</p> | <p>Four years</p> | <ul style="list-style-type: none"> <li>Engage in human capital analytics, including to identify correlations about individuals and job success, analyze data to improve retention and productivity, and analyze employee preferences to inform human resources policies and procedures</li> <li>Conduct applicant reference checks to assist in hiring decisions</li> </ul> | <p>Shared</p> |

Sensitive personal information is a subtype of personal information consisting of specific information categories. While we collect information that falls within the sensitive personal information categories listed in the table below, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a person.

| <b>Sensitive Personal Information Category</b>   | <b>Retention Period</b> | <b>Business Purpose</b>  | <b>Sold or Shared</b> |
|--|-------------------------|--|-----------------------|
| <p>Government identifiers, such as your Social Security number, driver's license, state identification card, passport and visa information, or immigration status and documentation.</p> | <p>Four years</p>       | <ul style="list-style-type: none"> <li>• Recruit and process employment applications, including verify eligibility for employment and conducting background and related checks</li> <li>• Process and administer payroll and employee benefit plans, including enrollment and claims handling</li> <li>• Maintain personnel records and comply with record retention requirements</li> <li>• Provide employees with human resources management services and employee data maintenance and support services</li> <li>• Communicate with employees and their emergency contacts and plan beneficiaries</li> <li>• Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws</li> <li>• Prevent unauthorized access to or use of the Company property, including information</li> </ul> | <p>Shared</p>         |

|  |                   |  |           |
|--|-------------------|--|-----------|
|  |                   | <p>systems, electronic devices, network, and data</p> <ul style="list-style-type: none"> <li>Respond to law enforcement requests and as required by applicable law or court order</li> </ul>   |           |
| <p>Complete account access credentials, such as user names, account numbers, or card numbers combined with required access/security code or password.</p>    | <p>Four years</p> | <ul style="list-style-type: none"> <li>Recruit and process employment applications, including verify eligibility for employment and conducting background and related checks.</li> <li>Provide employees with human resources management services and employee data maintenance and support services</li> <li>Prevent unauthorized access to or use of the Company information systems, electronic devices, network, and data</li> </ul> <p>[USE PURPOSES]</p> | <p>No</p> |
| <p>Precise geolocation, such as your physical access to a Company office location, or the location of a delivery, sales, or other employee in the field.</p> | <p>Four years</p> | <ul style="list-style-type: none"> <li>Improve safety of employees, customers, and the public regarding use of the Company property and equipment</li> <li>Prevent unauthorized access, use, or loss of the Company property</li> <li>Improve efficiency, logistics, and supply chain management</li> </ul>  | <p>No</p> |

|   |            |  |        |
|---|------------|--|--------|
|   |            | <ul style="list-style-type: none"> <li>• Ensure employee productivity and adherence to the Company's policies</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company's policy</li> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul>                     |        |
| Racial or ethnic origin.                | Four years | <ul style="list-style-type: none"> <li>• Comply with federal and state equal employment opportunity laws</li> <li>• Design, implement, and promote the Company's diversity and inclusion programs</li> <li>• Perform workforce analytics, data analytics, and benchmarking</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Company policy.</li> </ul> | Shared |
| Citizenship or immigration information. | Four years | <ul style="list-style-type: none"> <li>• Comply with federal and state equal employment opportunity laws</li> </ul>  | Shared |

|   |              |  |        |
|---|--------------|--|--------|
|   |              | <ul style="list-style-type: none"> <li>• Verify employment eligibility (Form I-9)</li> </ul>   |        |
| Religious or philosophical beliefs.                                 | Four Years   | <ul style="list-style-type: none"> <li>• Review and process religious reasonable accommodation requests</li> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul>   | Shared |
| Union membership.   | N/A          | <ul style="list-style-type: none"> <li>• Implement appropriate policies and procedures</li> <li>• Deduct union dues from paychecks</li> </ul>  | No     |
| Mail, email, or text messages contents not directed to the Company. | Four years   | <ul style="list-style-type: none"> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company policy</li> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul> | No     |
| Genetic data.   | Thirty Years | <ul style="list-style-type: none"> <li>• Investigate and process workers' compensation claims</li> <li>• Process health insurance claims</li> <li>• Conduct and process employment testing</li> </ul>  | Shared |

|  |                                 |   |        |
|--|---------------------------------|---|--------|
|  |                                 |   |        |
| Unique identifying biometric information.  | As long as reasonably necessary | <ul style="list-style-type: none"> <li>• Fingerprinting for a criminal background check after an initial offer of employment is made. Criminal background checks protect the company, mitigate risk, and avoid potential negligent hiring lawsuits</li> <li>• Ensure accurate time records</li> <li>• Exercise or defend the legal rights of the Company and its employees, and affiliates, customers, contractors, and agents</li> </ul> | No     |
| Health information, including job restrictions and workplace illness and injury information. | Thirty Years                    | <ul style="list-style-type: none"> <li>• Investigate and process workers' compensation claims</li> <li>• Process health insurance claims</li> <li>• Conduct and process employment testing.</li> </ul>  | Shared |

|   |           |  |        |
|---|-----------|--|--------|
|   |           | <ul style="list-style-type: none"> <li>• Ensure equal access to retirement programs and fertility planning by same-sex spouses</li> </ul>  |        |
|   |           | <ul style="list-style-type: none"> <li>• Ensure equal family leave policies and insurance for transgender surgeries</li> </ul>   |        |
| Sex life or sexual orientation information. | Six years | <ul style="list-style-type: none"> <li>• Process health insurance claims</li> <li>• Ensure equal access to retirement programs and fertility planning by same-sex spouses</li> <li>• Ensure equal family leave policies and insurance for transgender surgeries</li> </ul> | Shared |

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact [hr@lstaff.com](mailto:hr@lstaff.com) and 423-272-7897 x 1112.

EFFECTIVE DATE

01/01/2026