

## NOTICE OF COLLECTION - CALIFORNIA – December 2022

HBD Industries, Inc. / Precision Metal Products, Inc. / True Position Technologies, Inc. (“Company”)

This Notice of Collection - California (“Notice”) is to inform California individuals who are Company job applicants, employees, officers, owners, directors or contractors, including customers, suppliers or contractors (“Covered Individuals”) about the categories of Personal Information (“PI”) we may collect or have collected in the past 12 months, our purposes for collecting this PI, PI we may have disclosed to third parties, how long we retain PI, and your rights with respect to your PI we have collected.

This Notice is to be provided at or before the point of collection of PI. In this Notice, the terms “we,” “us,” and “our” refer to the Company. “You” refers to a Covered Individual.

### CATEGORIES OF PI WE COLLECT AND WHY WE COLLECT IT

PI does not include information that is deidentified or aggregated such that it cannot be associated with a particular Covered Individual. We do not provide financial incentives for you to provide your PI; however, if you choose not to provide your PI, we **may not be able to provide certain employee benefits, such as direct deposit payroll, or benefits non-employee Covered Individuals, such as credit terms.**

Employment PI. Below are examples of PI we may collect about Covered Individuals for employment-related purposes:

- Identifiers, such as name, home address, telephone number, visual information, email address, Social Security numbers and other government-issued ID numbers;
- Name, contact information, CV, education, employment history, credit reports, driving records, financial information, public social media;
- Personnel records, performance evaluations;
- Medical or health information, including conditions, treatment, histories for work accommodations, restrictions and benefit administration;
- Job preference and work availability;
- Race, ethnicity, sex identity, marital status, age;
- Data for benefits and related administration services;
- Professional or employment-related information, education and work history, information relating to references, background checks, drug test results, skills and experiences, human resources data;
- Internet activity, e.g., browsing history.

Other PI We May Collect. We may also collect PI from third party Covered Individuals such as customers, suppliers, advisors, service providers and other contractors. This PI may include business addresses, job titles, telephone numbers, email addresses, tax identification numbers, credit card numbers, banking information, credit histories, domain name, browser type, and pages viewed. Please see our website terms of use for information regarding cookies. We would not collect Sensitive Personal Information of third parties except in rare circumstances.

Sensitive Personal Information. Sensitive Personal Information includes Social Security numbers and other government-issued ID numbers, account or card numbers together with any password or access code or credential giving access to an account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, political or union membership, mail, email and text messages not intended for business use, genetic data, biometric data for uniquely identifying a natural person, health information,

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sex life or sexual orientation. Some the employment-related PI we collect will be considered “Sensitive Personal Information”.

Purpose and Use. The purposes for which such information is collected and which may be disclosed to third parties include: Employment application, contact applicants, job history, reference checks, I-9 form; Workforce management; Pay and administer wages, benefits, expense reimbursements; Monitor Company electronic and communications systems; Emergency contacts; Work accommodations; Affirmative action plans, EEO reports; Other, such as financial and benefit plan audits, legal requirements and compliance (e.g., export controls), quality, safety, risk and security control, fraud detection, legal, and litigation.

### PI DISCLOSED TO THIRD PARTIES

As stated above, we do not sell or share your PI. We may, however, disclose your PI to our affiliated companies and to third parties to the extent needed in connection with our ongoing relationship, transactions and business needs. Such third parties could include banks or other lenders, human resources service providers, benefit plan administrators and brokers, financial and plan auditors, payroll processors, communications providers, insurance companies and brokers, legal, actuarial, accounting and other professional advisors, and cloud service providers. PI may be disclosed as required or permitted under applicable law or in connection with any corporate restructuring, asset or stock sale, merger or other similar change of control. PI disclosed to third parties will be subject to the requirement that the third party keep the PI confidential and use the PI only for purposes consented to by you or other legitimate business purposes authorized by us.

### DATA RETENTION PERIODS

Employment-Related PI. Subject to applicable law and to any applicable exceptions and exemptions, PI of applicants who are not hired will typically be retained for a maximum of 5 years following application, and PI of current and former employees will typically be retained for the period of employment plus a maximum of 7 years. PI but may be retained longer if it relates to benefit or other claims or other reasonable business needs.

### Other PI.

PI of third parties outside the employment relationship will typically be retained for the duration of the relationship plus any relevant statute of limitations period. It may be retained longer in the case of reasonable business need.

### COVERED INDIVIDUALS’ RIGHTS

- Know (Data Portability). You have the right to know the PI the Company has collected about you.
- Correct. You have the right to correct PI that is inaccurate.
- Delete. You have the right to delete PI collected from you (as opposed to from others), subject to exceptions and exemptions such as retention for: completion of transactions, use consistent with the context for which the information was provided, debugging/repairing products, legal obligations, free speech rights and others. You may exercise this right no more than two times in any 12 month period. We will acknowledge your request within 10 days of receipt and will respond within 45 days of receipt. If we need more time (up to 90 days) we will inform you in writing as to why.

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- Opt Out of Sale or Sharing of PI. The Company does not sell your PI to any third parties in exchange for monetary or other valuable consideration or share your PI with *a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration*. If and when the Company decides to sell or share your PI, you will be given the right to opt out of the sale or sharing of your PI in accordance with applicable law.
- Opt Out of Automated Decision-Making Technology. The Company does not use automated decision-making technology. If and when the Company decides to use such technology, you will have the right to opt out of automated decision-making technology in accordance with applicable law.
- Limit on Use of Sensitive Personal Information. We will not use your Sensitive Personal Information, as defined above, to infer characteristics about you. If and when the Company decides to use such information to infer characteristics, you will be given the right to limit the disclosure and use and of such information, other than reasonably expected disclosure and use.
- No Retaliation. You will not be retaliated against for exercising any of these rights.

You may request to exercise your rights above by contacting us at (855) 860-6110 or [hr@hbdeo.com](mailto:hr@hbdeo.com).

### CHANGES TO THIS NOTICE

We review this Notice at least annually and update it as needed to ensure its accuracy. The Company may add to the categories of PI it collects and the purposes for which it uses that PI. If you have questions regarding this Notice or our privacy policy please contact us at (855) 860-6110 or [hr@hbdeo.com](mailto:hr@hbdeo.com).