**Cahill Contractors LLC**
**California Personnel Privacy Notice**

Last updated: July 1, 2023

This Privacy Notice (“Notice”) provides you with necessary information about the personal information Cahill Contractors LLC (“Cahill” or the "Company"), and its subsidiaries and affiliated companies collects, uses, and discloses. We want you to know how this information may be used, your privacy rights, and the Company’s obligations in accordance with the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA”).

This Notice is designed to comply with the CCPA. This Notice is not intended to create any rights beyond those that exist by virtue of applicable California privacy and data protection law.

**California Notice at Collection:**Cahill collects the personal information identified in Section 1 for the purposes identified in Section 2 and retains it for the period described in Section 4.  We do not sell your personal information or disclose it for cross-context behavioral advertising (“sharing”).  We also do not collect or process sensitive personal information for the purpose inferring characteristics about you.  To the extent that you provide personal information regarding your dependents, spouse, beneficiaries, or emergency contacts to Cahill, you are responsible for providing this notice to them.

**EEO Statement**

Cahill is an equal employment opportunity (EEO) employer.

Company is an equal employment opportunity employer. Company’s policy is not to unlawfully discriminate against any applicant or employee on the basis of race, color, sex, religion, national origin, age, disability, or any other consideration made unlawful by applicable federal, state, or local laws. Company also prohibits harassment of applicants and employees based on any protected category, characteristic or status. It is also Company’s policy to comply with all applicable state, federal and local laws respecting consideration of unemployment status in making hiring decisions.

Company complies with the ADA, the ADAAA and applicable state law and considers reasonable accommodation measures that may be necessary for qualified applicants/employees to perform the essential functions of the job. Hire may be contingent upon a post-offer medical examination, and to skill and agility tests, as appropriate for the position.

**Assistance for the Disabled**

If you have a disability that limits your ability to access this Privacy Notice, please contact us at **privacy@cahill-sf.com** to receive information on alternative formats.

**This Privacy Notice covers the following topics:**

1. [Personal Information We Collect](#Personal_Information_We_Collect)
2. [Sources of Personal Information](#Sources_Of_Personal_Information)
3. [Purposes of Use](#Purposes_Of_Use)
4. [Disclosure of Your Personal Information](#Disclosure_Of_Your_Personal_Information)
5. [Retention of Your Personal Information](#Retention_Of_Your_Personal_Information)
6. [Your Privacy Rights and How to Exercise Them](#Your_Privacy_Rights)
7. [Changes to this Privacy Notice](#Changes_To_This_Privacy_Notice)

**Scope:**

This Privacy Notice applies to the personal information of California residents in their role as (a) job applicants (**“Applicants”**), (b) employees, (c) independent contractors, interns, volunteers, owners, officers, and other individuals who perform work for the Company (collectively, **“Non-Employee Workers”**), or (d) employees’ and Non-Employee Workers’ dependents, spouses, emergency contacts, and beneficiaries (**“Related Contacts”**), (all collectively, **“HR Individuals”**) in their role as HR Individuals. This Privacy Policy informs HR Individuals about the categories of personal information Cahill has collected about them in the preceding twelve months as well as the categories of personal information that Cahill will collect about HR individuals in the future.

Except where the Privacy Policy refers only to a specific category of HR Individuals, e.g., employees, this Privacy Policy refers to all categories of HR Individuals collectively.

**“Personal information”** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular HR Individual.

“Personal information” does not include:

* Information publicly available from government records or made publicly available by you or with your permission;
* Deidentified or aggregated information;
* Information excluded from the CPRA’s scope, such as:
* protected health information covered by the Health Insurance Portability and Accountability Act (“HIPAA”) or the Health Information Technology for Economic and Clinical Health Act (“HITECH”) or medical information covered by California Confidentiality of Medical Information Act (“CMIA”); or
* personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), or the California Financial Information Privacy Act (“FIPA”).

**1.  Personal Information We Collect**

We may collect the following categories of personal information.  Not all categories may be collected about every HR Individual.

* **Contact information and identifiers**, including first and last name, online identifiers, account and user names, aliases, employee/staff ID, IP address, email addresses, home and postal addresses, telephone numbers, emergency contacts, and signatures and other identifiers described in the sensitive information category below;
* **Facial images and audio information**, for example, photos, videos, and voice recordings obtained from company recorded meetings
* **Demographic information,** for example, date of birth, gender, marital status, spouse and dependents;
* **Professional and background information**, including resumes, references, recommendations, academic and education background and qualifications, work skills and experience, professional certifications and registrations, language capabilities, training courses attended, work and salary history, results of credit history and criminal background checks, results of drug and alcohol testing, health screenings or certifications, and driving and vehicle licensing and history;
* **Work permit status**, for example, immigration, residency, and related information;
* **Payroll and tax information**, for example, amounts paid, pay rates, bonuses paid, banking and other financial institution details, insurance and benefits payments, and reimbursement of business expenses (such as travel);
* **Employment/assignment and performance information**, for example, date of hire, title, transfers and promotions, salary and rewards, training, performance appraisals/assessments, absences and reasons for absences, grievances or disciplinary matters, and resignation or termination of employment;
* **Benefits administration information**, including types of benefits used, time off requests (e.g., sick and personal leave, vacation requests) and reasons, retirement account information, and insurance;
* **Travel information**, for example, loyalty program numbers; dates and length of travel; hotel names and locations; travel routes and departures, stops, and destination points;
* **Internet or other electronic network activity information**, for example, worker communications and use of Cahill devices, systems, wifi, internet service, internal and external websites, equipment, applications, databases, network resources and personal devices used to connect to Cahill systems, including usernames; passwords; system log data such as IP address, browser type and language, device information, access times, and referring website addresses; information collected through web beacons, like cookie IDs and mobile device IDs; usage data, such as time spent on Cahill Systems. Voicemail, emails, chats, messaging, documents, and other data and files stored or transmitted through Cahill Systems;
* **Work Location information**, for example, office/jobsite location, conference room booking locations, travel location information described above,
* **Sensitive personal information**, including:
* government-issued identifiers including, social security, taxpayer identification, driver’s license, and national/ID passport numbers;
* criminal offenses;
* health information voluntarily disclosed to HR, for example, to conduct pre-employment physical examinations or to the extent necessary to comply with Cahill’s legal obligations, such as to accommodate disabilities;
* information about California and federal protected classes such as race/ethnic and national origin; religious creed; physical, medical, or mental health or condition and related accommodations; marital status; gender; age; and sexual orientation where permitted by law and on the basis of voluntary and consensual disclosure; and
* other information necessary for a legitimate human resources, business, security, travel, or safety-related purpose.

**Note on Inferring Characteristics:** Cahill does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about the HR Individual.

**2.  Sources of Personal Information**

Cahill collects personal information from the following categories of sources.  Not all categories apply to every HR Individual.

* **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you submit, and any information you provide us during the course of your relationship with us.
* **Your spouse or dependent** with respect to their own personal information.
* **Vendors and service providers**, for example, recruiters or law firms we have hired to provide services for us.
* **Affiliated companies,** for example, when an employee works on a cross enterprise team.
* **Third parties**, for example, job references or affiliated companies.
* **Automated technologies** on Cahill’s electronic resources, for example, to track logins and activity on Cahill’s careers page or network and access to offices and project sites.
* **Monitoring/recording technologies installed by Cahill**, for example, video surveillance in common areas of Cahill facilities and jobsites, voicemail technologies, and audio/video recording technologies with consent to the extent required by law.
* **Labor processes**, including collective bargaining processes, National Labor Relations Board processes to determine union representation, union dispatch documentation and grievance and arbitration processes.
* **Union agreements**, including collective bargaining agreements and other agreements between Cahill and a union.
* **Government or administrative agencies**, for example, law enforcement or public health authorities and other governmental regulatory agencies.

1. **Purposes of Use**

Cahill may use the personal information collected for one or more of the following purposes:

* **Fulfilling the purpose for which you provided the information or at your direction**. For example, if you share your name and contact information to apply for a job or become an employee, we will use that personal information in connection with your employment or potential employment.
* **Managing pre-employment matters** including, but limited to, recruitment, identifying you, communicating with you, evaluating your suitability for the position to which you applied, background screening, creating a talent pool for future job openings, fitness for duty, eligibility to work, promoting Cahill as a place to work, and other Applicant-related activities.
* **Administering the employment relationship** including, but not limited to, human resources administration, payroll processing, benefits administration, leave programs, corporate travel and other business expenses, timekeeping, managing work supplies, grievance or disciplinary matters, equal employment opportunity, diversity and inclusion, ascertaining your fitness to work, drug and alcohol screening, worker’s compensation administration, occupational health surveillance, direct threat analysis, and facilitating employee communication and collaboration.
* **Managing and/or analyzing all aspects of employee performance** including, but not limited to, talent management, career planning and development, periodic reviews, performance tracking, promotions, retention, discipline, education, training and development, and data analytics.
* **Administering the relationship with Non-Employee Workers**, including, but not limited to, evaluating the Non-Employee Worker’s qualifications, negotiating and executing work contracts, orientation and familiarization with Cahill’s working environment, administering the contractual relationship including payments, facilitating communications, and workforce satisfaction.
* **Administering the relationship with Related Contacts**, including, but not limited to, communications, managing and administering benefits, and managing participation in Cahill events.
* **Promoting Cahill and creating a positive environment in the workplace**, including, but not limited to, planning and running Cahill events, conducting surveys, running contests, and supporting diversity, accessibility, and inclusion.
* **Ensuring compliance with Cahill policies and applicable laws and regulations**, including, but not limited to, developing and enforcing policies and procedures, authenticating your identity, conducting internal audits and investigations, administering Cahill’s whistleblower hotline, and preparing reports.
* **Protecting health and safety** of HR Individuals, visitors, customers, and the public, including, but not limited to, responding to medical emergencies, reducing the risk of exposure to infectious disease and preventing its spread in compliance with applicable laws and regulations, and protecting the safety and security of Cahill’s facilities.
* **Ensuring the security and integrity of our information and electronic resources**, including but not limited to:

1. Protecting and improving Cahill systems: Implementing measures to safeguard our systems from unauthorized access and potential threats.

2. Monitoring use of electronic resources: Tracking and analyzing the usage patterns and activities within our electronic resources to maintain their optimal performance and identify any potential misuse.

3. Preventing unauthorized access: Employing security measures to prevent unauthorized individuals from accessing our electronic resources.

4. Preventing malicious software distribution: Implementing measures to detect and mitigate the distribution of malicious software or malware.

5. Debugging: Identifying and resolving technical issues, errors, or bugs within our electronic resources.

6. Audits: Conducting periodic assessments and evaluations of our systems and processes to ensure compliance and identify areas for improvement.

7. Disaster recovery: Implementing strategies and protocols to recover and restore data and systems in the event of a disaster or system failure.

8. Business continuity: Establishing plans and procedures to ensure the continuous operation of our business and minimize disruptions.

9. Cybersecurity: Protecting our information and electronic resources from cyber threats and vulnerabilities through proactive security measures."

* **Running our business**, including, but not limited to, customer service, project management, research, data analysis, and development, quality assurance and improvement, managing licenses, permits, and authorizations applicable to Cahill’s business operations, maintaining records, and efficiently managing and operating administrative, information technology, and communications systems, risk management and insurance functions, budgeting, financial management and reporting, and strategic planning.
* **Providing, supporting, personalizing, and improving our website and online services** relating to your prospective, current, or former employment or engagement.
* **Protecting the rights or property of Cahill**, including, but not limited to, detecting and prevent fraud or other types of wrongdoing, managing litigation involving the Company, and other legal disputes and inquiries, crisis management, dispute resolution, reporting suspected criminal conduct to law enforcement and cooperating in investigations, short-term transient use of personal information, responding to requests or orders from governmental agencies, exercising the Company’s rights under applicable law, and supporting any claim, defense, or declaration involving the Cahill in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.
* **In connection with a corporate transaction**, transfer, or assignment of assets, merger, divestiture, or other changes of control or our financial status or any of related subsidiaries or affiliates.

**Deidentified Information**

At times, Cahill converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual (**“Deidentified Information”**).  Cahill maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that Cahill may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual.

1. **Disclosure of Your Personal Information**

**Disclosures Generally**

To carry out the purposes outlined above, the Cahill may disclose information to third parties, such as background check vendors, third-party human resources and information technology vendors, outside legal counsel, and state or federal governmental agencies. The Company may add to the categories of PI it collects and the purposes it uses PI. In that case, the Company will inform you

**Disclosures of Personal Information for a Business Purpose**

In the preceding 12 months, we have disclosed the categories of personal information listed in Section 1, above, for a “business purpose,” as that term is defined by the CPRA.

* **Service providers:** We may disclose to service providers any of the categories of personal information listed in Section 1, above, for the business purpose of performing services on Cahill’s behalf and, in particular, for the specific purposes described in Section 3, above. Service providers include background check vendors, benefit providers, third-party human resources and information technology vendors, amongst others.
* **Auditors, lawyers, consultants, and accountants engaged by Cahill:** We may disclose the categories of personal information listed in Section 1, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on the Cahill’s behalf.
* **Affiliated companies:** We may disclose any of the categories of personal information listed in Section 1, above, to other companies within the Cahill family of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, including physical building security (c) debugging, (d) short-term transient use, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

**No Sales or Sharing of Personal Information**

In the preceding 12 months, we have not sold or “shared” personal information (disclosed personal information to third parties for behavioral advertising) of individuals in their capacity as HR Individuals.  We will not sell or “share” your personal information without providing you with an opportunity to opt-out of such sales. Without limiting the foregoing, we have no actual knowledge that we sell or “share” the personal information of any individuals in their capacity as HR Individuals, including individuals under 16 years of age.

1. **Retention of Your Personal Information**
* **Applicants** The Company retains the personal information of Applicants for the duration of the application process and, if not hired, for four (4) years after the record is collected, in compliance with California Government Code § 12946. If hired, Cahill retains Applicants’ information as described below for employees.
* **Employees, Non-Employee Workers, and Related Contacts** Cahill retains personal information for the duration of employment for employees, the duration of the engagement for Non-Employee Workers, and the duration of the relationship for Related Contacts, unless your personal information is no longer necessary for the purposes described in Section 3 above.

Cahill will retain HR Individuals’ personal information longer than described above if required by applicable law, regulation, administrative need, or legal process, or to exercise or defend legal claims.

1. **Your Privacy Rights and How to Exercise Them**

Subject to applicable law, California residents have the following rights:

**RIGHT TO KNOW** You have the right to submit a verifiable request for specific pieces of your personal information obtained from you and for information about Cahill’s collection, use, and disclosure of your personal information:

* The categories of sources from which we may collect your personal information;
* The categories of external recipients to whom we may disclose your personal information, but

not the individual sources or recipients.

You can submit up to two requests in a 12-month period. Please note that the CPRA’s right to obtain “specific pieces” does not grant a right to the whole of any document that contains personal information, but only to discrete items of personal information.

**RIGHT TO DELETION** You have the right to submit a verifiable request for the deletion of your personal information that you have provided to Cahill.

**RIGHT TO CORRECT** You have the right to submit a verifiable request for the correction of any inaccurate personal information maintained by Cahill, taking into account the nature of the personal information and the purposes of processing the personal information.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, in accordance with applicable law.

**How to Exercise Your Rights**

The Company will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

* Call **(888) 203-1353**
* Email **privacy@cahill-sf.com or** complete the request form available below:

<https://forms.microsoft.com/pages/responsepage.aspx?id=qrhs9EMupUORRin4q3o1U9oKHFsH6k1HhCh_7hh2N-NUN0cyM0JBRUY4SUM5SDFNOE5FUEgzTVlYRyQlQCN0PWcu>

**Verifying Your Request**

Otherwise, we match personal information that you provide us against personal information we maintain in our files.  The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity.  If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

**Authorized Agents**

You may designate an authorized agent to exercise your right to know, to correct, or to delete. If an authorized agent submits a request on your behalf, the authorized agent must submit with the request another document signed by you that authorizes the authorized agent to submit the request on your behalf.  In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity. You can obtain the “Authorized Agent Designation” form by contacting us at privacy@cahill-sf.com

In the alternative, you can provide a power of attorney compliant with the California Probate Code.

**Cahill’s Non-Discrimination and Non-Retaliation Policy**

Cahill will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the California Privacy Rights Act.

**7.  Changes to this Privacy Notice**

Cahill may occasionally update this Notice to reflect changes as required by law or by Cahill practices or procedures. If we make material changes to this Notice, or in how we use Employee’s Personal Information, we will provide notice or obtain consent regarding such changes as may be required by law.

**Contact Information**

If you have questions about the Company's privacy policies and procedures, you may call (888) 203-1353 or email privacy@cahill-sf.com.