

# EMPLOYEE & APPLICANT PRIVACY POLICY

**Download Privacy Policy:** <https://spep.com/privacy-policy-Employee-Applicant>

**Effective Date:** October 1, 2023

## Introduction

Sierra Pacific Engineering & Products, along with its parent and affiliated entities (“**Sierra Pacific Engineering,**” “**Sierra Pacific**”, “**us,**” or “**we**”), has adopted this Employee and Applicant Privacy Policy (“**Privacy Policy**”) to reflect our commitment to protecting your privacy and to inform you of our policies and practices regarding the collection, use, and disclosure of any Personal Information we may collect. We take the collection of Personal Information from our applicants, employees and our employees’ dependents, beneficiaries, references, designated persons, and emergency contacts seriously and are committed to protecting your and their Personal Information in accordance with this Privacy Policy. Please read below to learn how we collect, use, and disclose Personal Information.

Sierra Pacific Engineering only seeks to collect Personal Information as necessary to fulfill the purposes of its collection, namely, managing your employment with Sierra Pacific, verifying employment, education, references, the administration of benefits (including retirement, insurance, etc), and as otherwise disclosed in this Privacy Policy. Our Personal Information collection practices are focused so that we are only collecting and using your Personal Information to provide value to you. This Privacy Policy has been prepared to give you clear notice of:

- the categories of Personal Information collected and processed,
- the purposes for that processing,
- whether we have shared or sold your Personal Information to any third parties, and,
- if you are a resident of a state that provides you with additional privacy rights, information about those rights and how to exercise them.

If you have any questions that aren’t answered in this Privacy Policy, you can always contact us at [HR@spep.com](mailto:HR@spep.com) or by using the other contact information provided in the “**Contact Us**” section below.

## Where This Privacy Policy Applies

This Privacy Policy applies to Personal Information collected in the course of your application for employment, application-related screening, and employment with Sierra Pacific, including Personal Information collected from you regarding our employees’ dependents, beneficiaries, references, designated persons, and emergency contacts. Please be sure to share this Privacy Policy with any dependents, beneficiaries, references, designated persons, and emergency contacts so that they are aware of what might be done with their Personal Information.

For all employees, having accurate information about you is essential to ensure that you receive the appropriate benefits from your employment with Sierra Pacific. As such, we encourage you to review your employee information within Isolved at least annually (or any other time you need to make updates), to ensure that your information is correct.

## Contents of this Notice

Section	What can you find there?
<a href="#">The Types of Information We Collect</a>	This section describes the categories and examples of Personal Information that Sierra Pacific Engineering collects from you, as well as the categories of data subjects to which the collection practices apply. We also describe information that does not constitute Personal Information that may be collected by Sierra Pacific Engineering, including publicly available information, deidentified or aggregated information, or information that is excluded from the scope of applicable privacy laws.
<a href="#">How We Use Your Personal Information</a>	Read this section to learn more about how Sierra Pacific Engineering uses your Personal Information. This section also describes how you can opt-out of direct marketing emails, how we handle automated decision making, and our practices with respect to deidentified

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information.

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[How We Share and Sell Your Personal Information](#)

This section describes Sierra Pacific Engineering’s practices with respect to the sharing of your Personal Information to third parties, including the categories of third party recipients in connection with disclosures for business purposes or sales of Personal Information. Read this section to learn more about our Personal Information sharing practices for the prior 12 months.

Sierra Pacific Engineering does not sell the Personal Information of its applicants for employment, employees, or our employees’ dependents, beneficiaries, references, designated persons, or emergency contacts.

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[Additional Legal Notices](#)

We have created this section to provide you with additional notices about our privacy practices, including notices about the security measures we take to protect your Personal Information, how we handle Personal Information for children under the age of 16, and how we notify you regarding updates to our Privacy Policy.

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[Contact Us](#)

If you would like to contact us with any questions regarding our Privacy Policy or privacy practices, you can find our contact information here. If you live in a state or country that gives you additional privacy rights, you can find out more information about exercising those rights in the corresponding portion of the section titled “**Your Privacy Rights and Choices.**”

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[Your Privacy Rights and Choices](#)

In this section, you can learn more about your privacy rights and the options Sierra Pacific Engineering has made available for you to exercise those rights.

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## The Types of Information We Collect

We collect information that identifies, relates to, is reasonably capable of being associated with a particular living person or household (“**Personal Information**”). Privacy laws around the world describe Personal Information using a number of different terms, including personal data and personally identifiable information. For the purposes of this Privacy Policy, we use the term Personal Information with the intention that it be interpreted to mean the same thing as these other terms. If there is a specific type of Personal Information that has its own definition, we will provide that definition and use that name specifically (such as Sensitive Personal Information).

Various privacy laws exclude certain types of information from the respective definitions of Personal Information. For your awareness, Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated information; or,
- Information excluded from the scope of applicable privacy laws (including the CCPA and GDPR), like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Please note that, for the purposes of this Privacy Policy, we use the term “data subject” to refer to applicants, employees, and our employees’ dependents, beneficiaries, references, designated persons, and emergency contacts where appropriate to refer to those parties together. If our practices apply to a subset of data subjects, we will list the corresponding types of data subjects individually.

The below chart contains a category of Personal Information labelled “Personal Information” under California Civil Code Section 1798.80(e). That statute relates to customer records, which is not applicable to the relationship between Sierra Pacific Engineering and its applicants for employment, employees, or our employees’ dependents, beneficiaries, references, designated persons, or emergency contacts. We may separately possess information applicable to this category of Personal Information if you are also a customer of Sierra Pacific Engineering, which we hope you are, and that information is subject to our Customer Privacy Policy, available at: <https://spep.com/privacy-policy>.

In addition, the below chart contains a category of Personal Information labelled “Sensitive Personal Information.” Under the applicable privacy laws, Sensitive Personal Information means Personal Information that reveals: (1) a data subject’s social security, driver’s license, state identification card, or passport number; (2) a data subject’s account log-in, financial information, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (3) a data subject’s precise geolocation (within a circle with a radius of 1,850 feet or less); (4) a data

subject's racial or ethnic origin, religious or philosophical beliefs, or union membership; (5) the contents of a data subject's mail, email, and text messages unless the business is the intended recipient of the communication; or, (6) a data subject's genetic data. Sensitive Personal Information also include: (a) the processing of biometric information for the purpose of uniquely identifying a data subject; (b) Personal Information collected and analyzed concerning a data subject's health (mental or physical); and, (c) Personal Information collected and analyzed concerning a data subject's sex life or sexual orientation. Sierra Pacific Engineering does not use this information to develop inferences regarding you or your dependents, beneficiaries, references, designated persons, or emergency contacts, so rights that may otherwise be available to you under applicable privacy laws do not apply to this category of personal information.

In particular, in the prior 12 months we have collected the following categories of Personal Information from the listed categories of data subjects:

Category of Personal Information	Examples	Sources of Information	Types of Data Subjects Affected
<b>Identifiers</b>	First, middle, and last name (or initials), maiden names, postal address, Internet Protocol (IP) address, email address, account name, date of birth, passport/visa/alien number, Social Security Number, driver's license number, or other similar identifiers.	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• From service providers or contractors.</li> <li>• From publicly available sources, such as social media sites.</li> <li>• From Government Agencies</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> <li>• Dependents</li> <li>• Beneficiaries</li> <li>• Emergency contacts</li> <li>• References</li> <li>• Designated Persons</li> </ul>
<b>Personal Information under California Civil Code Section 1798.80(e)</b>	<p>Name, signature, Social Security Number, address, telephone number, and other information described under this law.</p> <p>Note that some Personal Information described in this category overlaps with other categories.</p>	This category relates to customer records and is not collected by us in relation to applicants, employees, dependents, beneficiaries, or emergency contacts.	None.
<b>Protected Classification Characteristics</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship (including immigration status and visa information), religion or creed, marital status, medical condition (including allergies), physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• From service providers or contractors.</li> <li>• From publicly available sources, such as social media sites.</li> <li>• From Government Agencies</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> <li>• Dependents</li> <li>• Beneficiaries</li> <li>• Emergency contacts</li> <li>• References</li> <li>• Designated Persons</li> </ul>
<b>Commercial Information</b>	Records of products or services purchased or considered, or other purchasing history or tendencies.	We typically do not collect this data but may do so if you make/consider purchases utilizing company property or using a company credit card.	<ul style="list-style-type: none"> <li>• Employees</li> </ul>
<b>Biometric Information</b>	Genetic, physiological, behavioral, and biological characteristics, or other activity patterns used to extract a template or other identifier such	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• Indirectly from you, such as through automated collection technologies.</li> <li>• From service providers</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Dependents</li> </ul>

	as fingerprints.	or contractors.	
<b>Internet or Other Similar Network Activity</b>	Browsing history, search history, information on a data subject's interaction with our information systems.	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• Indirectly from you, such as through automated collection technologies.</li> <li>• From service providers or contractors.</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> </ul>
<b>Geolocation Data</b>	Physical location or movements.	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• Indirectly from you, such as through automated collection technologies.</li> <li>• From service providers or contractors.</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> </ul>
<b>Sensory Data</b>	Audio, electronic, visual including photographs, thermal, olfactory, or similar information including infectious disease prevention such as COVID-19 related temperature checks, call monitoring, dashboard cameras, video surveillance, and video recordings.	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• Indirectly from you, such as through automated collection technologies</li> <li>• From service providers or contractors.</li> <li>• From Government Agencies, such as: Toll Booths, health departments, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> </ul>
<b>Professional or Employment-Related Information</b>	Current or past job history, performance evaluations, internal salary history. Information on references (including their email, phone number, place of employment, title, etc.). Also includes, certifications/licenses such as: training, educational, and professional.	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• From service providers or contractors.</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> <li>• References</li> </ul>
<b>Non-Public Education Information</b>	Education records related to a student maintained by an educational institution or a party acting on its behalf, such as grades, transcripts, class lists, schedules, financial information, or disciplinary records.	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• Indirectly from you, such as through automated collection technologies.</li> <li>• From service providers or contractors.</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> <li>• References</li> </ul>
<b>Inferences</b>	Profile information reflecting a data subject's preferences, characteristics, behavior, attitudes, or other similar information. Any and all other information you decide to share with the Company or its representatives.	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• We compile this information internally with the information you provide.</li> <li>• From service providers or contractors.</li> <li>• From employment appraisals and warnings</li> <li>• From applicant interviews, with information you provide.</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> <li>• Dependents</li> <li>• Beneficiaries</li> <li>• Emergency Contacts</li> <li>• References</li> <li>• Designated Persons</li> </ul>
<b>Sensitive Personal Information</b>	Social Security Number, driver's license, state identification card, or passport, racial or ethnic origin, union	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• From service providers or contractors.</li> <li>• Government agencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> <li>• Dependents</li> <li>• Beneficiaries</li> </ul>

	membership, information related to a data subject's citizenship or immigration status.	<ul style="list-style-type: none"> <li>• Court Orders.</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Contacts</li> <li>• References</li> </ul>
<b>Other Information</b>	Signatures, passport information, birth certificate information, credit report information, tax statuses, tax levies, wage garnishments, jury duty, court appearances, court orders, DMV driving history, auto insurance information, estate/trust information, disability (including status, accommodations, and possible conditions), personal / family matters, human trafficking / domestic violence status, medical information, and any and all other information you decide to share with the Company or its representatives.	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• We compile this information with the information you provide.</li> <li>• From service providers or contractors</li> <li>• Government agencies</li> </ul>	<ul style="list-style-type: none"> <li>• Applicants</li> <li>• Employees</li> <li>• Dependents</li> <li>• Beneficiaries</li> <li>• Emergency Contacts</li> <li>• References</li> <li>• Designated Persons</li> </ul>

For specific information regarding Sierra Pacific Engineering's collection and use of biometric information, please refer to our Biometric Information Privacy Policy, available at: Sierra Pacific Engineering's intranet, using keyword Biometric

## How We Use Your Personal Information

We may use or disclose the Personal Information we collect for one or more of the following purposes:

- Comply with all applicable laws and regulations.
- Conduct background checks, credit checks, and DMV driving history (where permitted by applicable law).
- Coordinate (where permitted by applicable law) and receive results of post offer employment physicals, post offer drug/alcohol tests, fit for duty physicals, return to work clearances, etc.
- Manage your employment relationship with us, including for;
- Application and onboarding processes;
- Timekeeping, payroll, and expense report administration;
- Employee benefits administration including retirement;
- Employee training and development requirements;
- Creation, maintenance, and security of your online employee / applicant accounts;
- Reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
- Acting as your health advocate if you are ill/injured on the job by notifying your allergies/known medical conditions to emergency medical staff;
- Workers' compensation claims management;
- Applicant and Employee job performance, including goals and performance reviews, hiring, training, promotions, discipline, and termination;
- Other human resources purposes as reasonably required by Sierra Pacific Engineering.
- Manage and monitor applicant and employee access to Sierra Pacific Engineering facilities, equipment, and systems.
- Conduct internal audits, workplace investigations, and generating compliance reports for government agencies.
- Investigate and enforce compliance with and potential breaches of Sierra Pacific Engineering's policies and procedures.
- Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Sierra Pacific Engineering.
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking.
- Administer and maintain the Sierra Pacific Engineering's operations, including for safety purposes.
- Exercise or defend the legal rights of Sierra Pacific Engineering and its employees, customers, contractors, and agents.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you advance notice. We will not perform any automated decision-making processes involving the information that we collect.

We may create Deidentified Information records from Personal Information by excluding information (such as your name and/or IP address) that would allow someone to identify a specific individual. "**Deidentified Information**" means information that is not associated with or linked to your Personal Information, including any feedback you may provide, which cannot be reidentified with your Personal Information. Deidentified Information does not permit the identification of individual persons. We may use this Deidentified Information to analyze request patterns and usage patterns so that we may enhance our products and services. Sierra Pacific Engineering reserves the right to use and disclose Deidentified Information to third parties at its discretion, however, we will maintain and use the information in deidentified form and will not attempt to reidentify the information, or authorize any third party to reidentify the information, except in connection with determining whether the deidentification processes satisfy the requirements of applicable privacy laws.

## How We Share and Sell Your Personal Information

We may disclose your Personal Information to a third party for a business purpose, specifically to enable and support the uses of your Personal Information described in the "**How We Use Your Personal Information**" section above. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

Sierra Pacific Engineering does not sell the Personal Information of applicants for employment, employees, or our employees' dependents, beneficiaries, references, designated persons, or emergency contacts.

In the prior 12 months, Sierra Pacific Engineering has disclosed for a business purpose and/or sold Personal Information to the categories of third parties indicated in the chart below.

Category of Personal Information	Category of Third-Party Recipients	
	<i>Business Purpose Disclosures</i>	<i>Sales</i>
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Service providers (only if such service provider is providing services relevant to this information)</li> <li>• Third Party Benefits Administrators</li> <li>• Contractors (only if such service provider is providing services relevant to this information)</li> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies</li> </ul>	We do not sell this data.
<b>Personal Information under California Civil Code Section 1798.80(e)</b>	We do not collect this category of Personal Information.	We do not collect this category of Personal Information.
<b>Protected Classification Characteristics</b>	<ul style="list-style-type: none"> <li>• Service providers (only if such service provider is providing services relevant to this information)</li> <li>• Contractors (only if such contractor is providing services relevant to this information)</li> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies</li> </ul>	We do not sell this data.
<b>Commercial Information</b>	We do not typically collect this data, but in the instances that we do, this	We do not sell this data.

	<p>information may be shared with:</p> <ul style="list-style-type: none"> <li>• Service providers</li> <li>• Contractors</li> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies (if requested or subpoenaed).</li> </ul>	
<b>Biometric Information</b>	<ul style="list-style-type: none"> <li>• Service providers (only if such service provider is providing services relevant to this information)</li> <li>• Contractors (only if such contractor is providing services relevant to this information)</li> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies (if requested or subpoenaed).</li> </ul>	We do not sell this data.
<b>Internet or Other Similar Network Activity</b>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Contractors</li> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies (if requested or subpoenaed).</li> </ul>	We do not sell this data.
<b>Geolocation Data</b>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Contractors</li> <li>• Affiliates of Sierra Pacific Engineering</li> </ul>	We do not sell this data.
<b>Sensory Data</b>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Contractors</li> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies</li> </ul>	We do not sell this data.
<b>Professional or Employment-Related Information</b>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Contractors</li> <li>• Affiliates of Sierra Pacific Engineering</li> </ul>	We do not sell this data.
<b>Non-Public Education Information</b>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Contractors</li> <li>• Affiliates of Sierra Pacific Engineering</li> </ul>	We do not sell this data.
<b>Inferences</b>	<ul style="list-style-type: none"> <li>• Affiliates of Sierra Pacific Engineering</li> </ul>	We do not sell this data.
<b>Sensitive Personal Information</b>	<ul style="list-style-type: none"> <li>• Service providers (only if such service provider is providing services relevant to this information)</li> <li>• Contractors (only if such</li> </ul>	We do not sell this data.

	contractor is providing services relevant to this information) <ul style="list-style-type: none"> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies</li> </ul>	
<b>Other Information</b>	<ul style="list-style-type: none"> <li>• Service providers (only if such service provider is providing services relevant to this information)</li> <li>• Contractors (only if such contractor is providing services relevant to this information)</li> <li>• Affiliates of Sierra Pacific Engineering</li> <li>• Government Agencies</li> </ul>	We do not sell this data.

To our knowledge, any sharing of Personal Information does not knowingly involve information related to children under the age of 16 except to the extent you have instructed us to share that information, for example, to benefits providers.

We may share some or all of your Personal Information with "Affiliates" (parent company, subsidiaries, joint ventures, or other companies under common ownership and/or control), in which case we will require our Affiliates to provide at least the same degree of protection for your Personal Information as we do under this Privacy Policy. If our company or our assets are acquired by another company, that company will possess the Personal Information collected by us and it will assume the rights and obligations regarding your Personal Information as described in this Privacy Policy.

In addition to the above, we may share your Personal Information with any third party at your instruction or request. That kind of sharing is not for our business purposes, though, and is not included in the above chart.

In certain circumstances, we may be required to disclose your Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, as well as to prevent crime or fraud.

## Sales of Your Personal Information

Sierra Pacific Engineering does not sell the Personal Information of applicants for employment, employees, or our employees' dependents, beneficiaries, references, designated persons, or emergency contacts.

## Additional Legal Notices

### ***How We Protect Your Information***

To protect your Personal Information, Sierra Pacific Engineering has adopted reasonable technical and organizational precautions in addition to following industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered, or destroyed.

Sierra Pacific Engineering has implemented industry-standard organizational and electronic means of protecting your Personal Information. We store Personal Information behind a computer firewall, which is a barrier designed to prevent outsiders from accessing our servers. In addition, Sierra Pacific Engineering protects your Personal Information from unauthorized physical access by storing your Personal Information in a controlled facility. Except as provided elsewhere in this Privacy Policy, Sierra Pacific Engineering limits access to Personal Information, regardless of if it is stored electronically or in physical form, to those persons (including employees and contractors) in Sierra Pacific Engineering's organization who have a business need for such access.

Even though we have taken significant steps to ensure that your Personal Information is not intercepted, accessed, used, or disclosed to or by unauthorized persons, you should know that Sierra Pacific cannot completely eliminate security risks associated with Personal Information.

### ***Data Retention***

We will only keep your information, including any Personal Information, for as long as necessary to fulfill the purposes for which we collected it, to comply with our legal obligations, or to enforce our legal rights (or as required so others may enforce their legal rights).



Generally, the length of time we keep your information will depend on the type of information and the purpose for which we are processing it. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we are processing it and whether we can achieve those purposes through other means, and any applicable legal requirements.

At the end of the appropriate retention period, we will either delete your information from our systems completely or anonymize it so it can be used without identifying you and so we no longer have the ability to re-associate the anonymized information with you in the future, such as by aggregating the information.

If you would like more information about our retention practices, please contact us using the information provided in the **“Contact Us”** section below.

## Contact Us

If you have any general questions about our Privacy Policy or questions about how we collect, use, or share your Personal Information, or would like to exercise your rights with respect to your Personal Information as permitted by certain laws applicable to applicants for employment, employees, and our employees' dependents, beneficiaries, and emergency contacts as described in greater detail below, please do not hesitate to contact our Privacy Officer at:

**Email:** HR@spep.com

**Mailing Address:**

Sierra Pacific Engineering & Products  
ATTN: Human Resources  
4041 Via Oro Ave  
Long Beach, CA 90810

## Your Privacy Rights and Choices

You have the following rights with respect to the collection, use, sharing, sale, and other processing of their Personal Information:

- The right to know what Personal Information has been collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you;
- The right to access the Personal Information, including to obtain a copy that can easily be sent to another data controller;
- The right to request the deletion of your Personal Information;
- The right to correct inaccurate Personal Information;
- The right to opt-out of the sale or sharing of your Personal Information;
- The right to restrict the processing of your Sensitive Personal Information;
- The right to opt-in to sale or sharing of your Personal Information (if you have previously affirmatively opted-out); and,
- The right not to be discriminated against for exercising any of your rights with respect to your Personal Information.

To exercise any of these rights, please follow the link under **“Exercising Your Privacy Rights and Choices”** and provide the requested information.

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by applicable law, we will not:

- Deny you services;
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of services;
- Suggest that you may receive a different price or rate for services or a different level or quality of services; or,
- Retaliate against an employee, applicant for employment, or independent contractor for exercising your rights under applicable law.

Sierra Pacific Engineering does not sell the Personal Information of applicants for employment, employees, or our

employees' dependents, beneficiaries, references, designated persons, or emergency contacts for monetary or other consideration to any third parties. Additionally, Sierra Pacific Engineering does not share with third parties the Personal Information of applicants for employment, employees, dependents, beneficiaries, references, designated persons, or emergency contacts. "Sharing" is defined under the applicable privacy laws as "sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a third party for cross-context behavioral advertising." As such, this right does not apply in the context of your status as an applicant for employment or employee of Sierra Pacific Engineering or to the dependents, beneficiaries, references, designated persons, or emergency contacts of our employees.

Applicable privacy laws also grant you the right to request the limitation of the use and disclosure of your Sensitive Personal Information. Because Sierra Pacific Engineering does not use Sensitive Personal Information to draw inferences, this right does not apply in the context of your status as an applicant for employment, employee, or our employees' dependents, beneficiaries, references, designated persons, or emergency contacts.

You also have the right to opt back into the sale or sharing of their Personal Information if they have previously opted-out of either or both of those processing activities. Because Sierra Pacific Engineering does not sell or share the Personal Information of our applicants for employment, employees, or our employees' dependents, beneficiaries, references, designated persons, or emergency contacts, and the right to opt-out does not apply in the context of your status as an applicant for employment, employee, or as a dependent, beneficiary, or emergency contact of an employee of Sierra Pacific Engineering, the right to opt-in also does not apply.

## **EXERCISING YOUR PRIVACY RIGHTS AND CHOICES**

If you would like to exercise any of the above privacy rights, please submit a verifiable rights request to us by either:

- Submitting your request by email to [HR@SPEP.COM](mailto:HR@SPEP.COM); or,
- Calling us at 800-433-5554.

Please also note that you are currently only permitted to submit one type of request at a time. If you would like to submit multiple request types, please submit each request separately and we will work with you to process the requests in an appropriate order.

You can also access and correct your Personal Information by logging into Isolved and using the features made available in the application. Specifically, when you log in, you should select the "Employee Self-Service" menu and view and, if required, update any information under the relevant sections.

Only you, or where allowed by applicable law someone legally authorized to act on your behalf, may make a verifiable rights request related to your Personal Information. You may also make a verifiable rights request on behalf of your minor child. If permitted by applicable law, to designate an authorized agent, you must authorize that agent to act on your behalf and the authorized agent must provide a copy of that written authorization when submitting their request on your behalf.

The verifiable rights request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, which may include:
  - Your first and last name;
  - Email address(es);
  - Street address; and,
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Based on the information you have provided, we will make commercially reasonable efforts to verify your identity against the information already in our systems. In the event we cannot verify your identity, we may request additional information from you so that we may complete your request in compliance with the requirements of applicable law. Please note that if you do not provide the required information, we may not be able to complete your rights request and will be required to deny it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. We will only use Personal Information provided in a verifiable rights request to verify the requestor's identity or authority to make the request.