



Privacy Policy

Revision	Date	Description	Issued By
0	10/11/23	New Policy	Julie Price
1	10/11/24	Additions to the Use and Disclosure of Personal Information section to address how names, city and state, and birth month and day information may be disclosed.	Julie Price

Introduction

E Tech Group is committed to maintaining the accuracy, confidentiality, and security of your personally identifiable information ("Personal Information"). As part of this commitment, our privacy policy governs our actions as they relate to the collection, use, and disclosure of Personal Information under the California Consumer Privacy Act of 2018 and California Privacy Rights Act of 2020 (collectively, the "CCPA")

Categories of Personal Information Collected

E Tech Group may collect, use, and/or disclose the following Personal Information from you during the onboarding process and throughout your employment in the preceding 12 months.

- As used in this Policy, "Personal Information" is any information that either directly or indirectly identifies, relates to, or describes a particular associate or household or is reasonably capable of being associated with or could reasonably be linked to a particular associate or household. Personal Information includes "Sensitive Personal Information."
- Sensitive Personal Information. As used in this Policy, Sensitive Personal Information is Personal Information that reveals a social security, driver's license, state identification card, or passport number; account numbers and credentials; precise geolocation; racial or ethnic origin, religious beliefs, or union membership; contents of email where the business is not the intended recipient; genetic data; biometric information; and personal information concerning an associate's health, sex life, or sexual orientation.
- As used in this Notice, the terms "Collect," "Processing," "Service Provider," "Third Party," "Sale," "Share," "Consumer," and other terms defined in the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the "CCPA"), have the meanings afforded to them in the CCPA, whether or not such terms are capitalized herein, unless contrary to the meaning thereof.
- Identifiers: Information that directly identifies you, such as your name, address, phone numbers, email addresses, photograph, government-issued IDs, such as your social security card, driver's license, visa and passport information, and work authorization documents.
- Personal Information categories described in the California Customer Records status: Name, signature, Social Security number, address, phone number, passport number, driver's license or state certification card number, bank account number, and medical or health insurance information.
- Protected classification characteristics under state or federal law: Characteristics such as age, race, national origin, citizenship, marital status, gender, medical condition, sex, veteran or military status, and disability information.

- Biometric information: Identifying information may include fingerprints or other physical patterns such as health or exercise data.
- Internet or similar network activity: Browsing history, search history, information on an associate's passwords, interaction with a website, application, or advertisement.
- Professional or employment-related information: May include past employment history, work schedule and status, work experience, and education.
- Financial information: Bank account/direct deposit information, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- Beneficiary and Dependent Information: Beneficiary and dependent information including names, contact information, social security numbers, and dates of birth.
- Sensitive Personal Information, including:
 - Personal Information that reveals:
 - Social security, driver's license, state identification card, or passport number;
 - Account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials for allowing access to an account;
 - Precise geolocation;
 - Racial or ethnic origin, religious or philosophical beliefs, or union membership;
 - Contents of an associate's email, unless the business is the intended recipient thereof; or
 - Genetic data.
 - Biometric data processed for the purpose of uniquely identifying an associate;
 - Personal Information Collected and analyzed concerning an associate's health; and
 - Personal Information Collected and analyzed concerning an associate's sex life or sexual orientation.

Sources of Personal Information

E Tech Group obtains the personal information listed above from the following sources:

- Directly from you on application forms you complete within our Applicant Tracking System.
- From third parties via our Background Check System based on information you provide and the reports the third party provides.
- Directly from you from onboarding forms you complete within our payroll and benefit systems.
- Public databases and providers of demographic data.
- Professional organizations and educational institutions.
- Social media platforms.

Use and Disclosure of your Personal Information

E Tech Group may use or disclose personal information for business and commercial purposes in the preceding 12 months, which may include the following:

- Personnel administration, such as identity verification, system set up, and to process work-related changes. Personal Information is disclosed to our immigration attorney, if applicable.
- Contacting you regarding your application and potential employment with us.
- Background checks and verification of past employment, educational history, professional standing, and other qualifications.
- Benefits processing, including determining eligibility for you and your dependents, assisting with claims, and submitting requests for life or disability benefits. Personal information is disclosed to benefit providers (401k, benefit system) and insurance carriers.
- Payroll uses financial information for direct deposit and W2 generation.
- Names are used in emails, company directories, or Teams communication.
- Birth month and day may be disclosed to acknowledge a birthday. Birth year is only disclosed if absolutely necessary. For example, for processing benefits or enrolling in the retirement plan.
- City and State information may be disclosed to determine proximity to a potential work site. Street address is only disclosed if absolutely necessary. For example, for processing benefits or enrolling in the retirement plan.
- Biometric information may be used for certain office entry and health and exercise data may be collected when participating in our Voluntary Wellness Program.
- Customer Requests - At times, E Tech Group must provide personal information for an associate to obtain a customer badge for site access.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations/filings.
- To monitor, investigate and enforce compliance with and potential breaches of E Tech Group's policies and legal and regulatory requirements.
- Exercise or defend the legal rights of E Tech Group and its employees, affiliates, customers, contractors, and agents.
- Manage and monitor employee access to company facilities, equipment and systems.
- Conduct internal audits and workplace investigations.
- Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of E Tech Group.
- Personal information is *never* sold to third parties.
- E Tech Group does not have actual knowledge that we Sell or Share Personal Information of California Consumers under 16 years of age. For purposes of the CCPA, a "Sale" is the disclosure of Personal Information to a Third Party for monetary or other valuable consideration, and a "Share" is the disclosure of Personal Information to a Third Party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

E Tech Group may use or disclose personal information to service providers or third parties for business and commercial purposes in the preceding 12 months, including:

Service Providers. We may disclose your Personal Information to our Service Providers for the purposes described in this Notice, to provide: applicant selection and related hiring services, benefits and wellness services, website services, as well as other products and services, such as web hosting, data analysis, customer service, infrastructure services, technology services, email delivery services, legal services, and other similar services.

We grant our Service Providers access to Personal Information only to the extent needed for them to perform their functions, and require them to protect the confidentiality and security of such information.

Third Parties. We may disclose your Personal Information to our Third Parties for the purposes described in this Notice:

- **At Your Direction.** We may disclose your Personal Information to any Third Party with your consent or at your direction.
- **Business Purpose.** We may disclose your Personal Information to a Third Party for a business purpose, such as obtaining a customer badge for you to access a customer site.
- **Legal and Regulatory.** We may disclose your Personal Information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.

Retention, Security, and Storage of your Personal Information

E Tech Group will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy for our legitimate business purposes. We will retain and use your personal information to the extent necessary to comply with our legal obligations. For example, if we are required to retain your personal information to comply with applicable retention laws.

We take the security of your personal information very seriously. All internal or customer requests for personal information must be sent to HR at hr@etechgroup.com or toll free at 888.848.1062. HR will determine what information needs to be provided and will send to the requestor in a secure way.

All personal information is stored in a secure manner and only provided to the requestor if necessary for the business purposes listed in this policy.

Your Rights

E Tech Group respects the confidentiality of your Personal Information. You have the following rights regarding the collection and use of your Personal Information, subject to certain exceptions:

- Right to Receive Information on Privacy Practices. We have provided such information in this Policy, and you may request further information about our privacy practices by contacting us as at the contact information provided below.
- The right to notice – You have the right to be notified which categories of personal information are being collected and the purposes for which the personal information is being used in the 12 months preceding your request.
- The right to request – You have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes and share of Personal Information. Once we receive and confirm your request, we will disclose to you:
 - The categories of personal information we collected about you.
 - The categories of sources for the personal information we collected about you.
 - Our business or commercial purpose for collecting that personal information.
 - The categories of third parties with whom we share that personal information.
 - The specific pieces of personal information we collected about you.
 - If we disclosed your personal information for a business purpose, we will disclose to you:
 - The categories of personal information disclosed.
- The right to correct – You have the right to have any incomplete or inaccurate personal information we hold on you corrected.
- The right to delete personal information - You have the right to request the deletion of your personal information, subject to certain exceptions. Once we receive and confirm your request, we will delete, and direct our service providers to delete, your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:
 - Complete the transaction for which we collected the personal information.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- The right not to be discriminated against - You have the right not to be discriminated against for exercising any of your consumer's rights, including by:
 - Denying goods or services to you.
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties.
 - Providing a different level or quality of goods or services to you.

- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will notify you by email and/or through our Intranet site.

Questions / Requests

If you have questions about this policy or wish to exercise your rights under this policy, please contact Human Resources at hr@etechgroup.com or toll free at 888.848.1062.

Only you or a person you authorize to act on your behalf, may make a verifiable request related to your personal information.

Your request to us must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.