

California employee and applicant privacy notice

The California Consumer Privacy Act of 2018 (CCPA) imposes specific obligations on businesses processing personal information of California residents. Pursuant to the CCPA, Sentry (“Sentry,” “we,” or “us”) is required to provide its employees and applicants for employment who are California residents (“California Persons”) a notice, at or before the point of collection of such personal information, that identifies the categories of personal information that may be collected and the purposes for which the information will be used.

This California Employee and Applicant Privacy Notice (“Notice”) provides California Persons with the required Notice, and unless separately defined in the Notice, any terms defined in the CCPA, or the implementing regulations, have the same meaning when used in the Notice. Sentry will not collect additional categories of personal information or use personal information already collected for additional purposes without providing a new Notice. Sentry reserves the right to amend the Notice at any time.

Personal information we collect

Listed below are the categories of personal information that Sentry may collect:

Identifiers, including real name, alias, postal address, physical address, unique personal identifiers, email, account name, social security number, date of birth, driver’s or other license number or identifier, passport number, mobile device identification number or other similar identifiers.

Characteristics or protected classifications under California or federal law, including race, color, religion, sex, national origin, religion, ancestry, physical or mental disabilities, medical condition, marital status, age, sexual orientation, and other protected characteristics protected by law.

Biometric information, including palm or fingerprint scans for facility access.

Internet or other electronic network activity information, including browsing history, search history, application access location; mobile device security status, information regarding an employee's interaction with an internet or intranet website, application or advertisement; and time and geolocation data related to use of an internet or intranet website, application, or physical access to a Sentry location.

Audio, electronic, visual, or similar information, including photographs, video interviews, and recorded phone calls.

Professional or employment-related information, including job-related data maintained as part of the employment relationship, that is present in information within a job application, resume, video interview, employment contract, contractor agreement, performance review, disciplinary record, or photo; information from employee expenses; internet browsing, and search history; payroll and benefits-related data; internal and external contact information; or information recorded or otherwise captured from video, audio, computer, other electronic systems, or other forms of monitoring or surveillance.

Education information, including information not publicly available about an employee's educational background, such as education records, internal learning and training, and transcripts.

Inferences, including any information drawn from any of the personal information categories referenced above to create a profile about an employee reflecting the employee's characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Purposes for using personal information

Sentry uses the personal information identified above for the purposes listed below:

To recruit employees, we may collect employment applications, resumes, work history, MVR records, applicant assessment

information, and performance evaluation information to conduct employment-related background screening and checks.

To administer benefits, such as medical, dental, optical, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance and accident management, and providing online total reward information and statements.

To pay for and reimburse expenses, including salary administration, payroll management, payment of expenses, and to administer other compensation-related payments, including assigning amounts of bonus payments to individuals and bonuses.

To conduct performance-related reviews, including performance evaluation, career planning, skills monitoring, job moves, promotions, and staff re-structuring.

To monitor work-related licenses and credentials, including provisioning software licenses for use in the course of an employee's work-related responsibilities, ensuring compliance, training, examination, and other requirements are met with applicable regulatory bodies.

To provide our employees with human resources management services, including providing employee data maintenance and support services; administration of separation of employment, approvals, and authorization procedures; administration and handling of employee claims; and travel administration.

To maintain your contact information, including altering your details across relevant entities within the Sentry group of companies (for example: personal information, other employment, and information about prior roles).

To assist you in case of personal or business emergency, including maintenance of contact details for you, your emergency contacts, and your dependents.

To monitor eligibility to work in the U.S., which means monitoring and ensuring compliance of your ability to work in the U.S.

To conduct healthcare-related services, including conducting pre-employment and employment-related medical screenings for return-to-work processes and medical case management; determining medical suitability for particular tasks; identifying health needs of employees to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on travel risk.

To facilitate a better working environment, which includes conducting staff surveys, providing senior management information about the workforce, and conducting training.

To ensure a safe and efficient working environment, which includes Sentry actions relating to disciplinary actions and code of conduct processes and investigations.

To maintain security on Sentry websites and internet-connected assets, which includes hosting and maintenance of computer systems and infrastructure; management of Sentry software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and Internet access.

To comply with applicable law or regulatory requirements, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic, and OSHA reporting (if applicable).

Contact information

If you have any questions about this Notice, please contact Human Resources at 715-346-6550 or askhr@sentry.com.