



PRIVACY NOTICE AT COLLECTION FOR CALIFORNIA RESIDENTS

Last Updated: November 7, 2024

This Privacy Notice at Collection applies to Ipeco Holdings Limited and its affiliates (collectively, (“Ipeco,” “we,” “us,” or “our”) with respect to personal information of California residents to the extent the information is subject to the California Consumer Privacy Act as amended by the California Privacy Rights Act of 2020 (“CCPA”). For example, this notice does not apply to personal information collected pursuant to (i) the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act; (ii) medical and health information covered by HIPAA; or (iii) de-identified or publicly available information.

Personal Information We Collect

We collect or use information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). The chart below includes information collected for various types of individuals, such as our customers, employees, and others. As a result, all of the categories of collected personal information described below may not be applicable to you. We may collect or use the following categories of your personal information in the following ways:



Category of Personal Information	Examples of Personal Information Collected or Used	Business or Commercial Purpose(s) for Which Used or Collected
Identifiers	A real name, alias, postal address, unique personal identifier, social security number, driver's license number, online identifier, Internet Protocol address, email address, phone number, account name or other similar identifiers.	<p>We use this Personal Information for performance of our services and for our business operations or for human resources purposes. For example:</p> <ul style="list-style-type: none"> • Providing you with the services that you request, such as by completing transactions, or providing a quote for one of our products. • Communicating with you, for example to respond to inquiries. • To help maintain the safety, security, and integrity of our website, information systems, databases and other technology assets. • To create, maintain, customize, and secure accounts with us. • To provide alerts or other messages via email and/or text messages concerning our products or services that may be of interest to you. • For testing, research, analysis, and product development, including to develop and improve our website, products and services. • To identify individuals to administer benefits and leave of absence programs and payroll. • To communicate with personnel. • To keep track of records related to our relationship with Personnel. • To evaluate applicants for employment. • To obtain a background check, consumer report, or investigative consumer report about personnel. • To allow personnel physical access to our premises.



Category of Personal Information	Examples of Personal Information Collected or Used	Business or Commercial Purpose(s) for Which Used or Collected
Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	<p>We use this Personal Information for performance of our services and for our business operations or human resources functions. For example:</p> <ul style="list-style-type: none"> • Providing you with the services that you request, such as by completing transactions. • Communicating with you, for example to respond to inquiries. • To identify individuals to administer benefits and leave of absence programs and payroll. • To communicate with Personnel. • To keep track of records related to our relationship with Personnel. • To evaluate applicants for employment. • To obtain a background check, consumer report, or investigative consumer report about Personnel. • To allow Personnel physical access to our premises.
Characteristics of protected classifications under California or federal law	Age, national origin, religion, citizenship, marital status, physical or mental disability, genetic information or ancestry, sex, veteran or military status.	<p>We use Personnel's Personal Information for our business operations or human resource functions, including:</p> <ul style="list-style-type: none"> • To keep track of personnel's eligibility to work in the United States. • To keep track of personnel's eligibility to work on certain programs subject to international export legislation. • For reporting to government agencies or regulators. • To provide appropriate services and benefits to all personnel.



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Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<p>We use this personal information for performance of our services and for our business operations. For example:</p> <ul style="list-style-type: none"> • Providing you with the services that you request, such as by completing transactions. • Providing you with information about our products or services that may be of interest to you. • Developing additional products or services. • Communicating with you, for example to respond to inquiries.
Biometric Information	<p><i>We do not collect this category of Personal Information.</i> If you are one of our employees, your company cellular phone or other company device may include built-in biometrics security features. We do not control or collect the information associated with these features.</p>	
Internet or other electronic network activity information	<p>Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements.</p> <p>Network traffic and other electronic or internet activity performed when acting as our personnel through our systems.</p>	<p>We use this Personal Information for performance of our services and for our business operations or human resource functions. For example:</p> <ul style="list-style-type: none"> • To provide access to our website and the information about our products and services contained therein. • For the security of our website and information systems. • To provide you with information, including communications about products that may be of interest to you. • To support, personalize, improve our website, products, or services. • To facilitate Personnel’s use of our information systems. • To protect our information systems and other property from harm or damage. • To secure our information systems against attacks or misuse. • To verify compliance with our policies, procedures, and workplace rules.



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Geolocation data	Geographic tracking data, physical location and movements.	<p>We use this Personal Information for performance of our business operations. For example:</p> <ul style="list-style-type: none"> • Facilitate services provided related to remote worksite management. • Geolocate individuals to confirm identifying information associated with our products and services.
Sensory Data	Images and audio, video or call recordings created in connection with our business activities	<p>We collect this information as the result of Personnel’s use of other systems to facilitate the security of our offices and information systems and use it for our internal business operations.</p> <p>We may also collect this information as part of our customer service interactions.</p>
Professional or employment-related information	<p>Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply to work with us.</p> <p>Current and/or past employment history, payroll records, benefits records, leave documentation, or medical records</p>	<p>We use Personnel’s Personal Information for our business operations, including:</p> <ul style="list-style-type: none"> • Evaluating job applicants’ suitability for a job opening, • Making decisions about promotion and determinations about seniority. • Supervision of Personnel and their performance. • To verify Personnel’s licenses or certifications.

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Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. 1232g, 34 C.F.R. Part 99))	Student records and directory information.	While we may collect information about your education history directly from you for the same purpose described above, we do not otherwise collect information directly from education agencies or institutions.
Inferences drawn from other personal information	A person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	<p>We use this Personal Information for our business operations. For example:</p> <ul style="list-style-type: none"> • To support, personalize, improve our website, products or services. • We collect this information to evaluate job applicants' suitability for a job opening.

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Sensitive Personal Information	Personal Information that reveals: a Social Security number or other government identifier; account login information or a financial account number with associated credentials; citizenship or immigration status; precise geolocation; contents of mail, email, or text messages; or genetic information. Or any of the following: the processing of biometric information to uniquely identify a consumer; collection and analysis of information that concerns a consumer's health information; collection and analysis of information that concerns a consumer's sexual orientation or sex life.	<p>We use this Personal Information for performance of our services, and for our business operations or human resource functions. For example:</p> <ul style="list-style-type: none"> • To provide our products and services and to process transactions. • To support, personalize, improve our website, products or services. • We collect this information to evaluate job applicants' suitability for a job opening. • To support regular human resources functions, such as identification and benefits administration. • To keep track of personnel's eligibility to work on certain programs subject to international export legislation. • For security purposes.

We do not sell consumers' Personal Information.

We do not share Personal Information (for purposes of cross-context behavioral advertising).



We do not sell or share (for purposes of cross-context behavioral advertising) the Personal Information of minors under 16 years of age.

We do share cookies with third parties as described in our online privacy policy <https://ipeco.com/privacypolicy/>. To opt-out of the sharing of information with third parties in this context, please review our online privacy policy for instructions or adjust your browser settings accordingly.

We do not use or disclose sensitive Personal Information for purposes other than for permitted business purposes under the CCPA, please review our CCPA Privacy Policy [here](#) for more information.

Further Information

Please visit our website www.ipeco.com and our CCPA privacy policy [here](#) for further information about personal information we collect, and your rights under the California Consumer Privacy Act as amended by the California Privacy Rights Act of 2020.

If you have questions about this notice, please contact us here for more information: <https://ipeco.com/contact-us/>.