



PRIVACY POLICY FOR CALIFORNIA RESIDENTS

Last Updated: November 7, 2024

This Privacy Policy for California Residents (“**CCPA Privacy Policy**”) applies to Ipeco Holdings Limited and its affiliates (collectively, (“**Ipeco**,” “**we**,” “**us**,” or “**our**”) processing of personal information of California residents to the extent the information is subject to the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (“**CCPA**”). For example, this Privacy Policy does not apply to personal information collected pursuant to various exemptions including for (i) information collected subject to 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, and (iii) de-identified or publicly available information. Ipeco primarily processes information subject to the CCPA in the business-to-business context and the information of its personnel or job applicants.

Personal Information We Collect, Use, Disclose, Share, or Sell

Categories of Personal Information We Collect, Categories of Sources of Personal Information, Business or Commercial Purposes for Which Personal Information Will Be Used, and Third Parties with Whom Personal Information is Sold, Shared, or Disclosed.

We collect information that identifies, relates to, describes, is reasonably 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, not all of the categories of collected Personal Information described below may be applicable to you. Within the last twelve (12) months, we may have collected the following categories of Personal Information from the sources identified below for the business and commercial purposes indicated, and disclosed, shared, or sold (as indicated) such categories of Personal Information with the specified categories of third parties:

Category of Personal Information	Examples of Personal Information that may be Collected	Categories of Sources of Personal Information that may be Collected	Business or Commercial Purpose(s) for which Collected or Disclosed	Categories of Third Parties to Which Personal Information may be Disclosed
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>Directly from you, for example when you apply to work for us or in your duties as our personnel, or as a customer when you fill out our forms, or from your transactions with us.</p> <p>From third parties that interact with us in relation to hiring or human resources operations and in connection with the products and/or services that we provide.</p>	<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. 	<p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements; and affiliates.</p>



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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.	See above.	We use this Personal Information for performance of our services and for our business operations or human resources functions. For example: <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. 	Vendors and other industry service providers; Government agencies including to support regulatory and legal requirements; and Affiliates.



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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>Directly from you, for example when you apply to work for us or in your duties as our personnel.</p> <p>From third parties that interact with us in relation to hiring or human resources operations.</p>	<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. 	<p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements; and</p> <p>Affiliates.</p>
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<p>Directly from you, for example when you fill out our forms, or from your transactions with us.</p> <p>From third parties that interact with us in connection with the products and/or services that we provide.</p>	<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	<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>	<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>As the result of your use of our online services, such as our website, consumer portals or mobile applications (if any), including through the use of cookies, Web beacons, embedded scripts, and other recognition and/or tracking technologies.</p> <p>Directly from you, for example when you apply to work for us or in your duties as our personnel.</p> <p>From third parties that interact with us in relation to hiring or human resources operations.</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. 	<p>Other third parties with which you or we maintain a relationship regarding your services or products;</p> <p>Government agencies including to support regulatory and legal requirements; and Affiliates.</p>
<p>Geolocation data</p>	<p>Geographic tracking data, physical location and movements.</p>	<p>Directly from you, for example when you use our applications or</p>	<p>We use this Personal Information for performance of our business operations. For example:</p>	<p>Vendors and other industry service providers;</p>



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		<p>applicable services or products.</p> <p>From third parties that interact with us in connection with the products and/or services that we provide.</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. 	<p>Government agencies including to support regulatory and legal requirements; and Affiliates.</p>
Sensory Data	Images and audio, video or call recordings created in connection with our business activities	<p>Directly from you, for example when you apply to work for us or in your duties as our personnel.</p> <p>From third parties that interact with us in relation to hiring or human resources operations.</p>	<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>	<p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements; and Affiliates.</p>

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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>Directly from you, for example when you apply to work for us or in your duties as our personnel.</p> <p>From third parties that interact with us in relation to hiring or human resources operations.</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. 	<p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements; and</p> <p>Affiliates.</p>



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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.	<p>Directly from you, for example when you apply to work for us or in your duties as our personnel.</p> <p>From third parties that interact with us in relation to hiring or human resources operations.</p>	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.	Vendors and other industry service providers; Government agencies including to support regulatory and legal requirements; and Affiliates.
Inferences drawn from other Personal Information	A person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	<p>Directly from you, for example when you submit your information to us, apply to work for us, or in your duties as our personnel.</p> <p>From third parties that interact with us in relation to hiring or human resources operations.</p>	<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. 	Vendors and other industry service providers; Government agencies including to support regulatory and legal requirements; and Affiliates.

<p>Sensitive Personal Information</p>	<p>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</p>	<p>Directly from you, for example when you submit your information to us, apply to work for us, or in your duties as our personnel.</p> <p>Employees and job applicants who seek employment. Users who disclose information directly to us to receive our services.</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 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. 	<p>Vendors and other industry service providers;</p> <p>Government agencies including to support regulatory and legal requirements; and Affiliates.</p>
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	consumer's sexual orientation or sex life.			

Information about our Personal Information Processing Activities

Additional details of how we process Personal Information is set forth in the chart above.

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 not* use or disclose sensitive Personal Information for purposes other than the following:

- (1) To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- (2) To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information,
- (3) To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- (4) To ensure the physical safety of natural persons.



(5) For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the Personal Information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business.

(6) To perform services on behalf of the business.

(7) To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by the business.

(8) To collect or process sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

Your Privacy Rights

Right to Notice

You have the right to receive notice at or before the point of collection about our collection and retention practices. Please review our notice at collection linked [here](#) for more information.

Submitting Consumer Requests

You may submit a consumer request to us by email at cpo@ipeco.com, or by phone at **(+1) 855 7800 091** (toll free) to make a consumer request. You may make up to two disclosure requests in any 12-month period. Please review the consumer request forms below.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

Making a verifiable consumer request does not require you to create an account with us.

When you submit a verifiable consumer request, we will take steps to verify your request by email or telephone call. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify



a request, we will notify the requestor. Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

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.

Right to Know and Access Your Information

You have the right to request that we disclose to you certain descriptions and categories of the Personal Information we collect, use, disclose, share, or sell about you. For example, you may request the following through a consumer request:

- (1) The categories of Personal Information we have collected about you.
- (2) The categories of sources from which the Personal Information is collected.
- (3) The business or commercial purpose for collecting or sharing Personal Information.
- (4) The categories of third parties to whom we disclose the Personal Information.
- (5) The specific pieces of Personal Information we have collected about you.

You may make up to two disclosure requests in any 12-month period. See above for additional details on making a consumer request.

Right to Request Deletion

You have the right to request that we delete your Personal Information. See above for additional details about how to submit a consumer request.



You should be aware, however, that California law allows us to retain your Personal Information under certain conditions, even if you have asked us to delete it, such as when retaining your Personal Information is necessary for us to complete a transaction with you or provide you with a good or service you have requested. We will notify you of any denial of your deletion request and the reason for such denial.

Right to Request Correction

You have the right to request that we correct your Personal Information. See above for additional details about how to submit a consumer request.

Right to Non-Discrimination for Exercise of Consumer Privacy Rights

We will not discriminate against you because you have chosen to exercise any of your privacy rights provided by the CCPA.

Using an Authorized Agent

You may use an authorized agent to submit a consumer request. To use an authorized agent, you will need to (i) provide written instruction to your agent, and verify your identity to us, or (ii) provide a power of attorney pursuant to California Probate Code Sections 4000 to 4465.

Contact Us

Please read this CCPA Privacy Policy carefully to understand our practices regarding how we process CCPA Personal Information. If you should have any questions regarding this CCPA Privacy Policy please contact us at cpo@ipeco.com, or by phone at **(+1) 855 7800 091** (toll free).

If you would like to contact us with a general question, please review our web site here: <https://ipeco.com/contact-us/>.