



FDH Privacy Policy for California Employees and Applicants

This Privacy Policy contains the policies, procedures and practices to be followed by Fasteners Distribution Holdings, Inc. and any of its present or future affiliated companies (together, “Company” or “FDH”), pertaining to the collection, use and disclosure of personal information (the “Personal Information”) of an identifiable person (the “Individual”) that is a present, future or former employee of the Company.

For the purpose of this Privacy Policy, the term “Personal Information” is defined by the California Consumer Privacy Act of 2018, encoded in California Civil Code Sections 1798.100 to 1798.198 (the “CCPA”). The CCPA aims to give California consumers increased transparency and control over how companies use and share their personal information. This Privacy Policy outlines the categories of personal information the Company may collect and the purposes for which the categories of personal information may be used.

Categories of Personal Data Collected

The CCPA lists 11 categories of personal information. The chart below lists the categories as outlined in the CCPA and provides disclosure regarding the personal information that may be collected by FDH before, during and after employment:

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| <p>California Civil Code 1798.140 (o) “Personal information” means 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 includes, but is not limited to, the following if it identifies, relates to, describes, is capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household:</p> | <p>FDH may collect the following information under each category defined by the CCP.</p> |
| <p>(A) Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers</p> | <p>Your real name, alias (if provided), postal address, your username, email address, social security number, driver’s license number, passport number, tax identification number, permanent resident card, work visa numbers.</p> |

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| <p>(B) Any categories of personal information described in subdivision (e) of Section 1798.80, which are: 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> | <p>Signature, telephone number, insurance policy number, education, employment, employment history, bank account number, 401k investment information, emergency contact information, payroll records, maternity certificates, workplace injuries, workers compensation or other insurance claim records, variable compensation or bonus plans, benefit enrollment information, likeness (photo release);health insurance information, physical characteristics could be included/collected through medical certifications required for disability leaves or accommodation requests, certificate/subscriber numbers for medical insurance, and group insurance policy numbers.</p> |
| <p>(C) Characteristics of protected classifications under California or federal law</p> | <p>Sex, marital status, age, gender, birthdate, disability, medical certifications relating to disability leaves, citizenship status, pregnancy, medical condition, leave requests</p> |
| <p>(D) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p> | <p>Company equipment loaned out, vehicle information (year, make, model, color, license plate no.), receipts of personal equipment purchased and reimbursed for work related use (home work stations, etc.)</p> |
| <p>(E) biometric information</p> | <p>None</p> |
| <p>(F) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.</p> | <p>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding interactions with an Internet Web site, application.</p> |
| <p>(G) geolocation data</p> | <p>Geolocation data, IP address.</p> |
| <p>(H) Audio, electronic, visual, thermal, olfactory, or similar information</p> | <p>Audio and video information provided via attendance at webinar, videos, social media etc.</p> |

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| (I) Professional or employment-related information | Information provided to FDH in CV, resume, job application, cover letter, information entered into an HRIS (or equivalent HR system) or physically provided to FDH. Information may include professional designations, work experience, employment records (e.g. performance management information, performance reviews, performance improvement plans, disciplinary notices, training information), employee change memoranda (which includes salary, hours of work, title, promotions, reporting relationships, internal employment history, etc.), business title. |
| (J) Education information | Information provided to FDH in CV, resume, job application, cover letter, information entered into HRIS (or equivalent HR system), continuing education as communicated to FDH. |
| (K) Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes | Information derived from performance reviews. |

Legal Basis & Purpose for Collection

The purposes of collecting the personal information outlined above are for the Company to:

- perform its contractual obligations with workers such as processing payroll, processing mandated taxes, and providing employee benefits;
- process an employee's leave of absence;
- contact the worker;
- recruit a worker;
- assess a worker's suitability for a position and monitor a worker's performance;
- accommodate an employee's health conditions;
- meet its legal obligations, preserve a legal right, or defend a legal claim; and
- regarding the worker's likeness, advertise and market the Company's services to clients.



Transfer of personal information

Personal information may be transferred to and between any of the Company's affiliated companies, as these companies assist with the aforementioned purposes. The Company ensures that personal information is safeguarded by storing personal information in a confidential file in password-protected environment, and by only permitting an employee to access the personal data if such access is required for the employee to perform their job functions or as otherwise required by law.

The Company may transfer an employee's personal information to third-party data processors that assist with administrative and payroll functions, and which assist in providing benefits to employees. The Company ensures it works with data processors that have stringent information security policies in place that meet the requirements of the CCPA and other applicable legislation. Currently, the Company contracts with the following third parties: Concur, VSP, Blue Shield of California, Principal, TransAmerica, Delta Dental, Paychex, Mercer, xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Effective January 1, 2020