

## Sample Employee Disclosure to Comply with Notice Obligation under section 1798.100(b) of the California Consumer Privacy Act

This disclosure is provided as a sample and may not be suitable for every situation. You may have additional CCPA disclosure obligations and should consult experienced counsel for legal advice. This disclosure should not be considered legal advice or a legal opinion. If you use this disclosure (either "as is" or by modifying the disclosure), you are responsible for all content.

**PLEASE REMOVE THIS TEXT BEFORE USING THE LETTER.**

[Insert Company Logo or Name]

### California Consumer Privacy Act Employee Disclosure

Dear Employee,

Respecting the privacy of our employees is an essential part of our privacy program. We are committed to the proper handling of the Personal Information collected or processed in connection with your employment relationship with us. This disclosure describes categories of Personal Information we collect and the purposes for which we process that information in accordance with section 1798.100 (b) of the California Consumer Privacy Act. The CCPA defines Personal Information as categories of information that identifies, relates to, describes or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household.

We collect, receive, maintain and/or share Personal Information with our service provider, ADP. The categories and the purposes described below for use of personal information reflects data processed across ADP's products.

	Categories of Personal Information Collected
Category A	Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers
Category B	Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history financial information, medical information and health information <sup>1</sup>
Category C	Characteristics of protected classifications under California or federal law, <sup>2</sup> such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and martial status
Category D.	Commercial information, such as transaction information, purchase history and financial details

<sup>1</sup> This includes 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.

<sup>2</sup> This include sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), age (40 and over), race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information AIDS/HIV status, martial status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave.

Category E. <sup>3</sup>	Biometric information, such as facial recognition and fingerprints
Category F. <sup>3,4</sup>	Internet or network activity information, such as browsing history and interactions with our website, applications or systems
Category G. <sup>3,4</sup>	Geolocation data, such as device location
Category H. <sup>4</sup>	Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities;
Category I.	Professional or employment-related information, such as work history and prior employer, human resources data and data necessary for benefits and related administrative services
Category J. <sup>4</sup>	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records
Category K.	Inferences drawn from any of the Personal Information listed above to create a profile or summary above, for example, an individual's preferences, abilities, aptitudes and characteristics

Personal Information is collected for the following purposes:

1. To comply with state and federal law and regulations;
2. To process payroll;
3. To track time and attendance;
4. To manage workers' compensation claims;
5. To administer and maintain benefits, including group health insurance;
6. To administer and maintain retirement service;
7. To manage employee performance of their job duties, including promotions, discipline, and/or termination;
8. To conduct workplace investigations;
9. To evaluate job applicants and candidates for employment;
10. To obtain and verify background checks;
11. To grant and monitor employees' access to secure company facilities;
12. To implement, monitor, and manage electronic security measures on devices that are used to access networks and systems (e.g., incident management);
13. To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company;
14. To maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance;
15. To anonymize and/or aggregate data to perform workforce analytics, data analytics, and benchmarking;
16. To perform call monitoring and surveillance (e.g., CCTV); and
17. To provide, validate, or communicate services offered by ADP directly to individuals.

If you have any questions about the collection and processing of your Personal Information or about the security of your Personal Information, please visit our website [\[hyperlink to the company privacy policy\]](#) or contact Human Resources.

<sup>3</sup> Only applicable where employer has selected to receive time keeping services from ADP.

<sup>4</sup> Only applicable where employer has selected to receive screening and selection services from ADP.