

Privacy Notice to California Residents

This notice to California Residents pursuant to the California Consumer Privacy Act and the California Privacy Rights Act supplements the information contained in our website and corporate privacy policies, procedures, and standards, and applies solely to employees, visitors, and other individuals who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), the California Privacy Rights Act of 2020 effective January 1, 2023 (“CPRA”) and other California privacy laws. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). We have collected the following categories of personal information on consumers as defined under the CCPA and CPRA within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers	A real name, IP address, email address, or other similar identifiers.	YES
B. Personal Information Categories listed in the California Customer Records Statute (Cal. Civ. Code §1798.80(e))	A name, signature, Social Security Number, address, telephone number, passport number, driver’s license number, insurance policy number, education, employment history, bank account number, credit card number, financial information, medical information, or health insurance information.	YES
C. Protected classification characteristics under California or Federal law.	Age, race, ancestry, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy, childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information.	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or similar network activity	Browsing history, search history, information on interaction with a website, application, or advertisement.	YES

Category	Examples	Collected
G. Geolocation Data	Physical location or movements.	NO
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g; 34 CFR Part 99).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO

Personal information does not include:

- Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's or CPRA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete on our website or job application portal.
- Indirectly from you. For example, from observing your actions on our website or job application portal.
- We retain your data pursuant to our records retention policy.

Use Of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name, contact information, and resume to be considered for a job posting, we will use that personal information in evaluating your qualifications for that position.
- To provide you with support and respond to your inquiries, including to investigate your concerns and monitor and improve our responses.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA and CPRA.

- We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosing Personal Information

We may disclose your personal information to a contractor or service provider for business purposes. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories (corresponding with the table above) of personal information for business purposes: Category A, Category B, Category C, Category I.

We disclose your personal information with the following categories of third parties: our clients, our service providers, and third parties to whom you or your agents authorize us to disclose your personal information in connection with services we provide to you. Examples of third parties Laufer uses to collect PI or to whom Laufer discloses PI includes but is not limited to, ADP, Cigna, Delta Dental, VSP, Ameriflex, HSA Bank, Fidelity, Concur, Egencia, and Culture Amp.

Your Rights And Choices

The CCPA and CPRA provide California residents with specific rights regarding their personal information. This section describes your CCPA and CRPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal and sensitive information unless responding to the request is impossible or involves disproportionate effort. Once we receive and confirm your verifiable request, we will disclose to you:

- The categories of personal information and sensitive information we collected about you.
- The categories of sources for the personal and sensitive information we collected about you.
- Our business or commercial purpose for collecting, using and/or disclosing that information.
- The categories of third parties, contractors and service providers with whom we share, sell or disclose that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list of those disclosures, identifying the personal information categories that each category of recipient obtained.
- Whether your information is sold or shared.
- The retention period or criteria used for retention.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please download and submit a request to the Laufer Human Resources Department at hr@laufer.com. Please include the information listed on the form to confirm your identity. As an alternative, you can call our Human Resources Department at 212-945-6000. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your personal information. You may also make a verifiable request on behalf of your minor child.

You may only make a verifiable request for access or data portability twice within a 12-month period. The verifiable request must:

- Provide enough information that allows us to reasonably verify whether you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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. We will only use personal information provided in a verifiable request to confirm the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

Laufer does not sell your personal information.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA or CPRA rights. Unless permitted by the CCPA or CPRA, we will not:

- Deny you services.
- Provide you a different level of service.
- Discriminate in making employment decisions.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits employees that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us an electronic message via hr@laufer.com.

Changes To Notice

Laufer may make changes to this Notice. Notification of changes will be posted on this page. You should review this Notice periodically to keep up to date on our most current policies and practices.

Questions And Contact Information

If you have questions regarding this Notice, please contact Laufer' Information Governance Team at hr@laufer.com.