



TITLE: REYES HOLDINGS CALIFORNIA CONSUMER PRIVACY ACT (“CCPA”) NOTICE TO EMPLOYEES	
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CALIFORNIA CONSUMER PRIVACY ACT NOTICE TO EMPLOYEES

Last Updated: June 19, 2024

Reyes Holdings, L.L.C. and its U.S. affiliates (collectively, “**Reyes,**” “**we**” or “**our**”) is providing the following details regarding our collection, use, retention and disclosure of personal information about California residents who are Reyes employees, independent contractors, job applicants, owners, directors or officers (and their emergency contacts and recipients of employment benefits) (“**Personal Information**”).

Please provide this notice to your emergency contacts and recipients of employment benefits by providing them with the link to this notice.

NOTICE AT COLLECTION

CATEGORIES OF PERSONAL INFORMATION

The following chart includes: (1) the categories of Personal Information, as listed in the CCPA, that we plan to collect and have collected and disclosed within the preceding 12 months; and (2) the categories of third parties to which we disclosed Personal Information for our operational business purposes within the preceding 12 months and may disclose on a going forward bases.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
Identifiers , such as name, alias, contact information, unique personal identifiers, and government-issued identifiers (e.g., Social Security number)	affiliates; service/benefits providers (“suppliers”); professional advisors; business partners; legal authorities
Personal information as defined in the California customer records law , such as name, contact information, education information,	affiliates; suppliers; professional advisors; business partners; legal authorities

employment history, financial information and medical and medical insurance information	
Protected Class Information , such as characteristics of protected classifications under California or federal law, such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status, request for leave and marital status	affiliates; suppliers; professional advisors
Biometric Information , such as fingerprints	affiliates; suppliers; professional advisors
Internet or network activity information , such as browsing history and interactions with our and other websites and systems	affiliates; suppliers; professional advisors
Geolocation Data , such as device location, vehicle location and IP location	affiliates; suppliers; professional advisors
Audio/Video Data. Audio, electronic, visual, and similar information, such as photographs or audio or video recordings created in connection with our business activities, as well as images and videos of taken by security cameras at our facilities located at outdoor front gates, along exterior building perimeters, and in indoor public areas, as permitted by law.	affiliates; suppliers; professional advisors
Education Information subject to the federal Family Educational Rights and Privacy Act	affiliates; suppliers; professional advisors
Employment Information. Professional or employment-related information, such as work history, prior employer, information relating to references, details of qualifications, skills and experience, human resources data, and data necessary for benefits and related administration services, such as retirement, health, and other benefit programs, services, and products to which you and your dependents and beneficiaries receive access through us	affiliates; suppliers (including healthcare suppliers); professional advisors;
Inferences drawn from any of the Personal Information listed above to create a profile or	affiliates; suppliers; professional advisors

summary about, for example, an individual's preferences	
Sensitive Personal Information. Information that reveals the employee's (i) social security, driver's license, state identification card, or passport number, (ii) precise geolocation, (iii) racial or ethnic origin, religious or philosophical beliefs, or union membership, (iv) the content of mail, email and text messages sent or received on Company devices, (v) biometric information for purposes of uniquely identifying the employee, and (vi) personal information collected and analyzed concerning the employee's health.	affiliates; suppliers (including healthcare suppliers); professional advisors

We do not “sell” and have not “sold” Personal Information, including your Sensitive Personal Information, for purposes of the CPRA in the last 12 months. We do not “share” Personal data for purposes of cross-context behavioral advertising, and have not “shared” Personal Information for purposes of the CPRA in the last 12 months. Without limiting the foregoing, we do not sell or share the Personal Information, including the Sensitive Personal Information, of minors under 16 years of age.

PURPOSES FOR PROCESSING PERSONAL INFORMATION

We use this Personal Information for the purposes of managing our workforce, including, for example:

- Manage workforce activities and personnel generally, including for recruitment, background screening, performance management, career development, payments administration, employee training, leaves and promotions;
- Administer hiring, promotion, and discipline;
- Provide an efficient means for personnel to obtain the contact information of their colleagues so they may contact them;
- Manage payroll, wages, tax forms and filing, expense reimbursements, and other awards such as stock options, stock grants and bonuses, and provide healthcare, pensions, savings plans and other benefits;
- Calculate insurance and other employee benefits;
- Monitor personal investments to comply with SEC insider trading regulations;
- Notify family members in case of an emergency;
- Maintain and secure our facilities, equipment, systems, and infrastructure;
- Undertake quality and safety assurance measures, protect the health and safety of our workforce and others, and conduct risk and security control and monitoring;
- Determine and monitor compliance with worldwide training and other policies;
- Conduct research, analytics, and data analysis to assist in planning succession and to ensure business continuity, as well as to design employee retention programs and diversity initiatives;
- Perform identity verification, accounting, audit, and other internal functions, such as internal investigations;

- Monitor use of IT infrastructure, internet access, and electronic communication for unauthorized, unlawful, or inappropriate use;
- Record phone calls for training, quality assurance, and legal compliance purposes;
- Operate and manage IT and communications systems and facilities, allocate company assets and human resources, and undertake strategic planning and project management;
- Obtain legal advice and establish, exercise or defend legal rights, and act on collection and discovery requests in the context of litigation, government investigations or regulatory audits or inquiries; and
- Comply with law, legal process, investigations, internal policies and other requirements such as income tax deductions, monitoring, record-keeping and reporting obligations.

PURPOSES FOR PROCESSING SENSITIVE PERSONAL INFORMATION

We may use or disclose the Sensitive Personal Information listed in the above table, as reasonably necessary and proportionate to achieve the following purposes:

- Manage workforce activities and personnel generally, including for recruitment, background screening, performance management, career development, payments administration, employee training, leaves and promotions;
- Administer hiring, promotion, and discipline;
- Manage payroll, wages, tax forms and filing, expense reimbursements, and other awards such as stock options, stock grants and bonuses, and provide healthcare, pensions, savings plans and other benefits;
- Calculate insurance and other employee benefits;
- Monitor personal investments to comply with SEC insider trading regulations;
- Maintain and secure our facilities, equipment, systems, and infrastructure;
- Undertake quality and safety assurance measures, protect the health and safety of our workforce and others, and conduct risk and security control and monitoring;
- Deploy technologies that improve efficiencies and accuracy of work performed by personnel;
- Determine and monitor compliance with worldwide training and other policies;
- Conduct research, analytics, and data analysis to design employee retention programs and diversity initiatives;
- Perform identity verification, accounting, audit, and other internal functions, such as internal investigations;
- Monitor use of electronic communication for unauthorized, unlawful, or inappropriate use;
- Obtain legal advice and establish, exercise or defend legal rights, and act on collection and discovery requests in the context of litigation, government investigations or regulatory audits or inquiries; and
- Comply with law, legal process, investigations, internal policies and other requirements such as income tax deductions, monitoring, record-keeping and reporting obligations.

We do not use Sensitive Personal Information for purposes beyond these, or to infer characteristics about individuals.

PURPOSES OF DISCLOSURE OF PERSONAL INFORMATION

We disclose Personal Information to our service providers and providers of the benefits we offer to our employees to enable them to provide services to us and to provide benefits to our employees and their beneficiaries. We also disclose Personal Information to third parties to perform background checks and

at the request of our personnel and former personnel, for example to provide employment verification to third parties.

We may disclose personal information to third parties in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Reyes holdings' business, assets or stock (including in connection with any bankruptcy or similar proceedings).

RETENTION PERIODS

We will retain each category of your Personal Information for a period of time based on the following criteria:

- The duration of your employment;
- As long as we have an ongoing relationship with you, your dependents or beneficiaries of your employment benefits;
- As required by a legal obligation to which we are subject;
- As advisable in light of our business or legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

SOURCES

We receive the personal information from you, or our employees for whom you are registered as an emergency contact or a beneficiary. We also receive information from our managers, references that you provide, prior employers or schools, customers, background check providers and publicly available sources. We may also obtain personal information about you through footage taken from security cameras at our facilities, including outdoors at entry gates, along building perimeters, and indoors in public areas as permitted by applicable law. We may also obtain personal information about your use of technology, devices and equipment in the course of your work.

RIGHTS AND REQUESTS

If you are a California resident, you may make the following requests:

(1) "Request to Know"

You may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
- The specific pieces of Personal Information we collected about you in a transferable format;
- The business or commercial purpose for collecting (if applicable) Personal Information about you;
- The categories of Personal Information about you that we shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information.

(2) “Request to Correct or Delete”

You may request that we correct or delete Personal Information we collected from you.

To make a Request, please contact us at: privacy@reyesholdings.com or U.S. (888) 295-6392

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as information that we can reasonably use to verify your identity, in order to protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. You may make a request on behalf of a child who is under 13 years old if you are the child’s parent or legal guardian. If you make a Request to Delete, we may ask you to confirm your request before we delete your Personal Information.

If you are the authorized agent of an employee making a request for information, or a request to correct or delete Personal Information on behalf of the employee, we will ask you for proof that the employee has authorized you to make such a request on the employee’s behalf. This must be a permission signed by the employee. “Signed” means that the permission has either been physically signed or provided electronically in accordance with the Uniform Electronic Transactions Act, Civil Code 1633.7 *et seq.*

If an authorized agent has not provided us with a power of attorney from the individual pursuant to Probate Code sections 4021-4130, we may also:

1. require the employee to provide you with a written permission signed by the employee to make the request on the employee’s behalf
2. verify the identity of the employee as we would if the employee were making the request personally.
3. Obtain verification from the employee that they provided the authorized agent permission to make the request.

Right to Non-Discrimination

You have the right to be free from unlawful discriminatory treatment for exercising your rights under the CPRA.

CHANGES TO THIS NOTICE

We may change or update this Notice from time to time. When we do, we will post the revised Notice on this web page with a new “Last Updated” date. If we make a material change that affects Personal Information that we collected prior to the change, depending on the nature of the change, we might notify you of the change and we might request your consent to the change.