

The Walsh Group

California Privacy Rights Statement and Policy

PRIVACY RIGHTS POLICY FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act (“CCPA” or the “Act”) grant residents of the State of California certain privacy rights in their personal information. Effective January 1, 2023, due to the passage and enactment of the California Privacy Rights Act (CPRA), the Act also applies to the personal information a business collects from job applicants, employees, and other covered third parties.

This Privacy Statement and Policy is intended to define personal information, explain what personal information is collected, make you aware of your rights under the Act, and explain how you may exercise such rights.

This Privacy Statement only applies to California residents (hereinafter “you” or “consumer”) and the personal information collected from California-based job applicants, employees, employees of subcontractors, independent contractors, and certain third parties who perform work for the Walsh Group, Ltd., Walsh Construction Group, LLC, and their subsidiaries (collectively “Walsh”).

The Act defines various terms used in this Privacy Statement such as: consumer, sale, share, cross-context behavioral advertising, and the definitions of any terms used in this Privacy Statement are incorporated herein.

PERSONAL INFORMATION

To understand your privacy rights, you first need to know what information is covered by the Act. The Act defines personal information as 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, however, does not include:

- Deidentified or aggregated consumer information.
- Publicly available information from federal, state or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or information made available to a person by a consumer if the information was not restricted to a specific audience. Personal information also does not include lawfully obtained, truthful information that is a matter of public concern.

The Act also recognizes a special category of personal information called Sensitive Personal Information. The chart immediately below identifies the categories of personal information, provides examples of Sensitive Personal Information covered by the CCPA, and indicates whether we collect it.

Category	Examples	Collected
A. Identifiers	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.	YES
B. 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial 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 other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data	Physical location or movements.	YES
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 C.F.R. 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.	YES
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	NO
L. Sensitive Personal Information	A person's: social security, driver's license, state identification card or passport number; account login, financial account, debit card, or credit card number in combination with any required security or access code, password or credentials allowing access to the account; precise geolocation, race or ethnic origin, religious or philosophical beliefs, union membership, contents of a person's mail, email and text messages unless the business is the intended recipient; genetic data; processing biometric information for the purpose of uniquely identifying a person; information collected and analyzed concerning a person's health, sex life or sexual orientation.	YES

WE DO NOT “SELL” OR “SHARE” PERSONAL INFORMATION OR USE PERSONAL INFORMATION TO INFER CHARACTERISTICS ABOUT YOU

Before outlining your privacy rights under the Act, please understand Walsh does not sell your personal information. We do not share personal information for cross-context behavioral advertising as those terms are defined in the Act. We also do not collect or process Sensitive Personal Information for the purpose of inferring characteristics about you. Your personal information is only shared with third-parties for purposes of meeting business needs as further discussed below. As a result, the Act’s rights to opt-out of the sale or sharing of personal information and to limit the use and disclosure of sensitive personal information, which are mentioned below, do not apply to the personal information that we may collect from or about you.

Privacy Rights

The Act requires that we disclose to you at or before the time we collect any personal information, the categories of personal information to be collected (outlined above), the purposes for which the personal information is collected or used and whether that information is sold or shared for cross-context behavioral purposes. If sensitive personal information is to be collected, to disclose the categories sensitive personal information to be collected, the purposes for which it is collected or used and whether such information is sold or shared as well as the length of time we intend to retain your personal or sensitive personal information.

The Act also provides California residents with the right to request that Walsh disclose:

- Categories of personal information we have collected about you.
- Categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting, selling or sharing personal information.
- Categories of any third parties to whom we disclose personal information.
- Categories of personal information we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- The specific pieces of personal information we have collected about you.

You have the right under the Act to request that we delete any personal information about you that we collected from you, subject to certain exceptions outlined below.

You also have the right to request that we correct any of your personal information in our possession that you believe to be inaccurate.

The Act further prohibits the discriminatory treatment of a person for the exercise of the privacy rights conferred by the Act.

Business Purpose For Our Collection, Use and Disclosure of Personal Information

The term “Business Purpose” is defined by the Act as “the use of personal information” for “operational purposes, or other notified purposes,” provided “that use is reasonably necessary and proportionate to achieve the purpose for which the personal information was collected or processed or for another purpose that is compatible with the context in which the personal information was collected.” The Business Purposes for our collection and use of your personal information are outlined in our California Privacy Notice and are repeated here for your ease of reference:

- To evaluate your eligibility or suitability for employment, including but not limited to confirming employment and educational histories and eligibility when applicable, checking references and conducting background checks;
- To calculate your salary and any withholding for state or federal taxes, social security payments or any benefits offered or required by the Firm;
- To make salary payments, other payments, direct deposits or necessary calculations;
- To evaluate and permit your participation in any retirement plan offered by Walsh in which you are eligible to participate under the terms of that plan and to administer your participation in and payments made to or from any plan;
- To administer personnel policies and to assess risk management issues;
- To evaluate or administer any type of benefits offered for which you or a family member may be eligible, and to pay and or dispute claims;
- To determine compliance with federal contracting compliance requirements, including programs for veterans or individuals with disabilities;
- To track the use of vacation, sick days, disability or leave policies;
- To notify a person you designate in the event of an emergency;
- To comply with any legal obligation imposed upon us by law;
- To maintain safe worksites and projects;
- To defend or prosecute a lawsuit, administrative proceeding, or any type of legal, regulatory or administrative claim, challenge or dispute which may include responding to discovery requests involving your information;
- To communicate with you or a related third party such as our insurer, any benefits or claims administrator or your agent, broker or a claim administrator about the status, developments or the outcome or our legal analysis of any claim or dispute;
- To comply with any legal demands or lawful orders issued in an administrative proceeding, by a tribunal or court of law such as subpoenas, warrants, or other legal process, or to comply with a regulatory obligation imposed by a governmental or regulatory agency or official, which could include meeting various compliance or recordkeeping requirements, financial and credit checks,

fraud and crime prevention requirements, and which may require manual or automated checks of your personal information against various databases and lists;

- To prepare bids, including highlighting personnel knowledge, background, and experience for marketing purposes, or as it relates to business development and marketing efforts to attract new clients or business and/or to retain existing clients and business;
- For any other lawful purpose necessary to further the legitimate interests of our Firm;
- To comply with federal, state or local laws and regulations including but limited to tax, civil rights and ERISA.
- To meet or fulfill the reasons you provided us the information, including to process offerings or requests, complete transactions, to make payments or refunds, to provide necessary information and to prevent transaction fraud;
- To help maintain the safety, security, and integrity of our websites, products, services, applications, databases, networks, and other technical assets;
- Debug, identify, rectify, or mitigate errors or vulnerabilities in our website, systems, applications, technologies, hardware, software, servers or equipment;
- To audit, improve, develop, modify or support our websites, products and services;
- To respond to lawful requests for information through court orders, subpoenas, warrants and other legal process, obligations or governmental regulations;
- To protect the operations of our law firm, or the safety, security and privacy of our Firm, our lawyers and staff, our clients or third parties. This potentially includes sharing information with others for purposes of fraud protection, information security, and related matters;
 - To review, confirm and evaluate the identity of a person making a request concerning information in our possession.
 - For any purpose related to any of the foregoing.

How Long We Retain Personal Information

We strive to retain any personal information in accordance with our record retention schedule. If any information is subject to a litigation hold, or is required to assert or defend a legal claim, then we will hold that information until the claim or action is finally resolved.

Requests to Delete Personal Information

You have the right to request that we delete personal information collected from you. Once we receive a request and confirm the identity of the person making the request, we will delete that information from our active system unless one of the exceptions listed below applies. Personal

information stored on an archived or backup system will not be deleted pursuant to such a request until the archived or backup system is restored for active use, or the information is next accessed for a disclosure or a commercial purpose.

The CCPA provides that we are not required to comply with a request to delete personal information if the information is necessary for our Company to:

- Comply with a legal obligation.
- Complete the transaction for which the information was collected, provide a good or service you requested, perform a contract with you, to fulfill the terms of a written warranty, or take actions reasonably anticipated by you in the context of our ongoing business relationship with you.
- Help to ensure security and integrity to the extent your personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, to ensure the rights of others to exercise their free speech rights, or to exercise another right provided by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546 *et. seq.*).
- Enable solely internal uses that are reasonably aligned with your expectations based upon your relationship with our Company and compatible with the context in which you provided the information.

Act's Limitations on Disclosures

We are not obligated under the Act to respond to any request where compliance or disclosure would violate an evidentiary privilege under California law, or conflict with federal or state law.

The Act does not require that we provide personal information to a consumer more than twice in a twelve-month period. If we are unable to verify the identity of a person making a request, we may deny a request to disclose categories and other information requested.

Any disclosures we make will generally cover the twelve (12) month period preceding the request. While you can request information for longer than a 12-month period, our obligation to provide information beyond 12 months only applies to personal information collected on or after January 1, 2022, and does not apply where providing more than 12 months of information proves to be impossible or involves a disproportionate effort.

We will not charge a fee to process or respond to your request and will provide information free of charge. Where a person's requests are repetitive, manifestly unfounded or excessive, the CCPA authorizes us to either charge a reasonable fee that takes into account our administrative costs, or

refuse to act on the request and notify the person making the request our reason for refusing the request. If we determine that a request warrants a fee, we will explain our decision and will endeavor to provide you with a cost estimate.

The Act and its regulations prohibit us from disclosing a person's Social Security number, driver's license number, other government issued identification number, financial account number, any health insurance or medical identification number, an account password or security questions and answers.

How To Exercise Your Privacy Rights

You can exercise these rights in several ways. You can make a request by calling the Human Resources Department at 312-563-5905 or by submitting a request via email HR@walshgroup.com . You can also send a request by mailing it to Walsh Construction Company, Attn: Human Resources Department, 929 W Adams Street, Chicago, IL 60607.

You may make the request on your own behalf or on behalf of your minor child. Another person who is legally authorized to act on your behalf may also submit a request for you. Please describe your request in sufficient detail to allow us to understand the nature of the request, evaluate and respond to it. Please provide sufficient information with your request to allow us to verify that you are the person about whom we collected personal information, or an authorized representative of that person.

We will acknowledge receipt of your request and begin our verification process.

How We Will Verify and Respond

Before we respond to any request involving personal information, the Act requires that we confirm the identity of the person making the request, and if the request is made on behalf of another person, his or her authority to make the request on the other person's behalf. We are not obligated to provide, correct or delete any information pursuant to your request if we are unable to adequately verify your identity or the identity of the person making the request on your behalf.

Accordingly, we reserve the right to deny any request where we are unable to satisfactorily confirm your identity or the identity of the person making the request. If you have authorized someone to make a request on your behalf, we reserve the right to deny the request if we are unable to adequately verify the identity of that person or if we are unable to verify that the individual making the request is authorized to act on your behalf.

We will attempt to verify your identity by matching any information provided in your request against the personal information already in our possession. If you have authorized someone to make a request on your behalf, we will attempt to verify the identity of that person. We will also seek to confirm that you have authorized that person to submit a request on your behalf, which may include requesting a copy of any written authorization or power of attorney for the request.

The amount of information we may require in our verification process will depend on a variety of factors including the nature of your request, the type, sensitivity and value of the personal

information in our possession, the potential risk of harm that could result from any unauthorized access to, unauthorized change or unauthorized deletion of your personal information, the likelihood that fraudulent or malicious actors would seek your information and whether the information provided to us in your request is sufficient to protect against fraudulent requests or requests that are fabricated or spoofed. For instance, we will require more points of confirmation if you request that we disclose specific pieces of information rather than categories of information in our possession. Concerning a request to delete information, once we confirm your identity, we will separately confirm that you want the information deleted.

During our verification process, we may request additional information from you. Any information provided to us during our verification process will only be used for purposes of verifying your identity or the identity and/or authority of the person making the request.

We will endeavor to respond within forty-five (45) days of receipt of your request. If, however, we are unable to respond within that time, we will notify you of the reason and the additional time needed to make our response. The Act permits us to extend the time of our response by up to an additional 45 days.

If we deny a request in whole or in part we will endeavor to explain the reasons for our denial.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA or CRPA rights.

Updates to Our Privacy Statement

We will update our Privacy Statement as needed to remain compliant with applicable law and regulations. Please periodically check our California Privacy Statement to learn of any changes to our Statement.