

PPM Associate Privacy Notice

Privacy of associate personal information is a top priority at PPM. This notice is intended to provide PPM associates with notice that identifies the categories of personal information that may be collected and the purposes for which PPM collects, uses, or shares such information.

The below references have the following meanings:

- **“personal data”** or **“personal information”** includes information that PPM collects about you in the course of employment for employment-related purposes and includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you.
- **“process”**, **“processed”** or **“processing”** means any operation or set of operations which is performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.
- **“associates”**, **“associate”** or **“you”** means an identified or identifiable natural person who is acting as a job applicant, associate, or contractor. In this context “job applicant” refers to any person who has submitted their candidacy with PPM; “associate” refers to any person who is employed at PPM as a full-or part-time associate, strategic support associate, temporary worker, or intern and “contractor” means a natural person who provides any service to PPM pursuant to a written contract.

PERSONAL INFORMATION WE MAY HAVE COLLECTED OR USED WITHIN THE PAST 12 MONTHS

Below is a list of the categories of personal information we may have collected or used within the past 12 months. We did not necessarily collect all the specific pieces of personal information listed for any given associate or category.

Category
<i>Identifiers</i> 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. In this context, a “unique personal identifier” means a persistent identifier that can be used to recognize an associate, or a device that is linked to an associate, over time and across different services, including, but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, or similar technology; unique pseudonym, or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers.
<i>Characteristics of protected classifications under California or federal law</i> , including the following: sexual orientation; race; ethnicity; national origin; religion; sex/gender (includes pregnancy, childbirth, breastfeeding and/ or related medical conditions); gender identity and gender expression; marital status; medical conditions (such as genetic characteristics, cancer or a record or history of cancer); disability (physical or mental); military or veteran status; religion (includes religious dress and grooming practices); sexual orientation; request for family care leave; request for leave for an associate's own serious health condition; request for pregnancy disability leave; age; and political affiliations or activities.
<i>Commercial information</i> , including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
<i>Biometric information</i> , including imagery of your fingerprint, face, voice print and voice recordings.
<i>Internet or other electronic network activity information</i> , including, but not limited to, business emails, text messages, browsing history, search history, application access location and information regarding an associate's interaction with an Internet Web site, application, or advertisement, time and geolocation data related to use of an internet website, software application, or physical access to any of PPM's office locations.
Any category of sensitive personal information described in Cal. Civ. Code § 1798.140(ae)(1) to (2): “ <i>Sensitive personal information</i> ” means (1) “personal information” that reveals: a consumer's social security, driver's license, state identification card, or passport number; a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; a consumer's precise geolocation; a consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; a consumer's genetic data; or (2) the processing of biometric information for the purpose of uniquely identifying a consumer; personal information collected and analyzed concerning a consumer's health; or personal information collected and analyzed concerning a consumer's sex life or sexual orientation.
<i>Professional or employment-related information</i> , including: job related data, maintained as part of an application or the employment relationship that is present in: a job application or resume; professional networking sites; an employment contract or job offer; a contractor agreement; a performance review; a disciplinary record; an investigation; photos; information from associate expenses; browsing and search history; payroll and benefits related data; internal and external contact information; or information captured from video, audio, systems, or other forms of monitoring or surveillance.
<i>Education Information</i> , including information about an associate's educational background, such as education records and transcripts, that is not publicly available.
<i>Inferences</i> , including any information drawn from any of the personal data categories referenced above to create a profile about an associate reflecting the associate's characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

BUSINESS PURPOSE FOR WHICH WE COLLECT PERSONAL INFORMATION

Use of your personal information depends on your relationship to PPM. We do not necessarily collect all the specific pieces of personal information listed above for any one specific business purpose, but rather, we used personal information, generally, in the below circumstances. Except as indicated below, PPM retains personal information pursuant to its document retention policy which is in accordance with our governing laws and regulations.

- **To Recruit Associates**, including to conduct employment-related background screening and checks, criminal background checks and drug testing.
- **To Administer Benefits**, such as medical, dental, vision, and retirement benefits, including recording and processing eligibility of dependents, tuition reimbursement, absence and leave monitoring, and life insurance.
- **To Pay and Reimburse for Expenses**, including salary administration, payroll management, payment of expenses, to administer other compensation related payments, including assigning amounts of bonus payments to individuals and administration of departmental bonus pools.
- **To Conduct Performance-Related Reviews**, including performance appraisals, career planning, skills monitoring, job moves, promotions, and staff re-structuring.
- **To Monitor Work-Related Licenses and Credentials**, including provisioning licenses for use during an associate's work-related responsibilities, ensuring compliance, training, examination, and other requirements are met with applicable regulatory agencies.
- **To Provide Our Associates with Human Resources Management Services**, including providing associate data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of associate claims, and travel administration.
- **To Administer Domestic and International Travel/Assignments**, including relocation services, documenting assignment terms and conditions, obtaining relevant immigration documents, initiating vendor services, fulfilling home/host country tax administration and filing obligations, and addressing health and safety requirements.
- **To Maintain Your Contact Information**, including altering your details across relevant entities within PPM (for example personal, other employment, and transferring roles).
- **To Assist You in Case of Emergency**, including maintenance of contact details for you, and your dependents in case of personal or business emergency.
- **To Monitor Eligibility to Work in the U.S.**, which means monitoring and ensuring compliance of associates' ability to work in the U.S.
- **To Conduct Healthcare-Related Services**, including conducting pre-employment and employment-related medical screenings for return-to-work processes and medical case management needs; determining medical suitability for work-related tasks; identifying health needs of associates to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on fitness for travel and fitness for expatriation.
- **To Facilitate Better Working Environment**, which includes conducting associate surveys, providing senior management information about other associates, and conducting training.
- **To Ensure a Safe and Efficient Working Environment**, which includes processing relating to disciplinary actions, associate handbook and code of conduct processes, and investigations.
- **To Maintain Security on the Company's Information Systems**, websites and internet connected assets, which includes hosting and maintenance of computer systems and infrastructure; management of PPM's software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and Internet access.
- **To Comply with Applicable Law or Regulatory Requirements**, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic and health, safety, security, and environmental reporting

CHANGES TO NOTICE

This notice explains broadly how we collect, share and use associate personal information. You may be provided with privacy policies or statements that supplement this notice. PPM reserves the right to change its privacy policy or any supporting or related policies or procedures at any time. If there are any changes to this notice, documents containing the revisions will be updated, including at our website at [PPM Privacy Policies](#) or at <https://www.ppmamerica.com/privacy-policy>, and will be effective immediately. Contact us at privacy@ppmamerica.com should you have any questions about this privacy policy, our privacy commitments or our website; and to submit a request related to your privacy rights (if applicable) please visit our [California-Specific Privacy Policy](#) page. As a job applicant, associate, or contractor you have the right not to receive discriminatory treatment and not be retaliated against for exercising your CPRA rights.

Click [HERE](#) to download a printable copy.

This notice was last updated on July 10, 2025.