# KKW Trucking, Inc. California Applicant Privacy Notice

Effective Date: January 1, 2023

The purpose of this Applicant Privacy Notice ("Applicant Privacy Notice") is to inform KKW Holdings, Inc., its subsidiaries and affiliates, including KKW Trucking, Inc., The Complete Logistics Company, and RedRox Logistics LLC ("KKW," "Company," "us," "we," or "our") California workforce Applicants of our practices regarding the collection, use, and disclosure of their personal information ("Applicant Personal Information"), and the rights they have under the California Consumer Privacy Act, as amended (the "CCPA"). "Applicant" means California residents applying for workforce jobs with KKW.

Unless otherwise noted, the disclosures herein cover our activities in the twelve (12) months preceding the Effective Date, as well as our current practices.

#### Collection, Use, and Disclosure of Applicant Personal Information

As used in this Applicant Privacy Notice, the term "Applicant Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with KKW Applicants. Applicant Personal Information does not include information that is publicly available, de-identified, or aggregated, and the CCPA exempts certain additional categories of information from its purview, such as information subject to other laws and regulations. This Notice applies only to information governed by the CCPA.

KKW may collect, use, and disclose Applicant Personal Information for business purposes consistent with applicable laws as identified below. Where KKW discloses applicable Applicant Personal Information to recipients, such as our service providers, it does so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.

Category of Applicant Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Applicant Personal Information is Disclosed for a Business Purpose
Identifiers such as name, alias, telephone number, email address, mailing address, IP address, signature, professional licenses, driver's license number, or other similar identifiers	<ul> <li>To open and maintain your application records</li> <li>To assess your eligibility to work with us</li> <li>To communicate with you regarding your application</li> <li>To comply with applicable laws and regulations</li> <li>To detect and prevent fraud against you and/or us</li> </ul>	<ul> <li>Service providers</li> <li>Background check vendors</li> <li>Information technology vendors</li> </ul>
Personal information described in Cal. Civ. Code § 1798.80(e) such as name, physical and electronic signature, address, telephone number, education, employment, employment history	<ul> <li>To open and maintain your application records</li> <li>To assess your eligibility to work with us</li> <li>To communicate with you regarding your application</li> </ul>	<ul><li>Service providers</li><li>Background check vendors</li><li>Information technology vendors</li></ul>

Some of these pieces of information may overlap with other categories.  Protected classification characteristics such as age and date of birth, sex, gender, race, marital status, disability, military or veteran status	<ul> <li>To comply with applicable laws and regulations</li> <li>To detect and prevent fraud against you and/or us</li> <li>To comply with applicable laws and regulations</li> <li>To assess your eligibility to work with us</li> </ul>	Service providers     Background check vendors
Internet or other electronic network activity information such as browser type and language, operating system, website usage, emails, or text message communications	<ul> <li>To communicate with you</li> <li>To improve our website</li> <li>To protect the security of our website</li> <li>To detect and prevent fraud against you and/or us</li> </ul>	Service providers     Information technology vendors
Sensory information, such as security camera recordings, photographs to the extent contained on documents you provide, audio recordings of phone calls and/or phone interviews	<ul> <li>To open and maintain your application records</li> <li>To detect and prevent fraud against you and/or us</li> <li>For safety and security</li> </ul>	Service providers     Background check vendors
Professional or employment-related information such as skills, qualifications, work experience, references, recommendations, and other information included in a resume, CV, or application form;  Answers to behavioral or other screening questions in an application or interview;  Information contained in any websites or documents you choose to share with us;  Information relating to professional licenses, training, or disciplinary actions.	<ul> <li>To open and maintain your application records</li> <li>To assess your eligibility to work with us</li> <li>To comply with applicable laws and regulations</li> <li>To detect and prevent fraud against you and/or us</li> <li>For safety and security</li> </ul>	Service providers     Background check vendors
Non-public education information such as school(s) attended, area of study, dates attended, and other information relating to your secondary and post-secondary education, including any graduate or professional degrees	<ul> <li>To open and maintain your application records</li> <li>To assess your eligibility to work with us</li> <li>To comply with applicable laws and regulations</li> </ul>	Service providers     Background check vendors
Personal Information that does not fall directly within the categories listed in the CCPA such as driving record, criminal records, background check information, drug and alcohol screening history, languages spoken,	<ul> <li>To open and maintain your application records</li> <li>To assess your eligibility to work with us</li> <li>To comply with applicable laws and regulations</li> </ul>	Service providers     Background check vendors

immigration, visa status, and work authorization information	To detect and prevent fraud against you and/or us	
	For safety and security	

In addition, we may receive and collect additional categories or examples of information from you that you may provide on a voluntary basis which we would not otherwise request or collect. For example, information you provide to us in communications, during your interviews, on your CV, or in your cover letter.

## | Collection, Use, and Disclosure of Applicant Sensitive Personal Information

KKW may collect, use, and disclose Applicant sensitive Personal Information for business purposes consistent with applicable laws as identified below. Where KKW transfers applicable Applicant sensitive Personal Information to recipients, such as our service providers, it does so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.

Category of Applicant Sensitive Personal Information	Purposes for Collection or Use	Categories of Recipients to whom Applicant Sensitive Personal Information is Disclosed for a Business Purpose
Social security, driver's license, passport number, or state identification card	<ul> <li>To assess your eligibility to work with us</li> <li>To comply with applicable laws and regulations</li> <li>To manage the security of our premises and systems</li> </ul>	Security providers     Background check vendors     Information technology vendors
Personal Information collected and analyzed concerning a consumer's health (i.e., drug-screening information)	To assess your eligibility to work with us	Background check vendors     Service providers

## III. Disclosing Your Applicant Personal Information

We may disclose each of the categories of Applicant Personal Information identified above to the respectively identified categories of recipients for operational or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible with the context in which the Applicant Personal Information was collected including, but not limited to:

- Helping to ensure security and integrity;
- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Internal research for technological development; and

Verifying quality and/or safety.

In addition to the other purposes for collection, use, and disclosure of Applicant Personal Information described in this Applicant Notice, we may collect, use, and disclose Applicant Personal Information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our or others' rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations. Likewise, we may use and disclose Applicant Personal Information to other parties in connection with the sale, assignment, merger, or reorganization.

## IV. Sources of Applicant Personal Information

We may collect Applicant Personal Information from the following sources:

- **Directly from you.** For example, throughout the application process with us, including through our IT systems, company forms, and other processes where you submit information to us.
- Automatically when using our electronic systems. For example, we may collect your usage history when you use our websites, systems, and applications.
- Automatically when you visit our facilities. For example, security camera footage.
- From service providers that help us run our business. For example, information technology vendors, background check agencies, and other service providers.
- From other external sources. For example, social media pages, and data providers.

We may also collect publicly available information about you, including information that is lawfully made available to the general public from federal, state, or local government records.

#### V. Sales and Sharing of Applicant Personal Information

We do not sell Applicant Personal Information or share it for cross-context behavioral advertising. If you also interact with us as a consumer, please review our California Consumer Privacy Notice [https://www.kkwtrucks.com/privacy-policy/] for more information about our practices in that context. We do not have actual knowledge that we sell or share the Personal Information of consumers under sixteen (16) years of age.

## VI. How Long We Keep Your Applicant Personal Information

We generally maintain Applicant Personal Information according to our retention obligations and policies, operational business purposes, and other legal and regulatory requirements. For example, the Applicant Personal Information you provide may be retained and used to consider whether your skills are suitable for other opportunities with KKW. We discard this type of Applicant Personal Information when reasonably practicable.

We keep the categories of Applicant Personal Information described above for as long as is necessary for the purposes described in this Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Applicant Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information:
- Your Applicant Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- Your Applicant Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your Applicant Personal Information by applicable laws or regulations.

Where Applicant Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

## VII. Submitting Requests Relating to Your Applicant Personal Information

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please contact us at PCN@kkwtrucks.com or call us at 1-800-955-4559. Please note that, if you submit a request to know, request to delete or request to correct, you will be asked to verify your identity in accordance with the law. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed.

**Right to Know**. You have the right to know what Applicant Personal Information we have collected about you, which includes:

- (1) The categories of Applicant Personal Information we have collected about you, including:
  - a. The categories of sources from which the Applicant Personal Information was collected:
  - b. Our business purposes for collecting Applicant Personal Information;
  - c. The categories of recipients to which we disclose Applicant Personal Information:
  - d. The categories of Applicant Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Applicant Personal Information.

(2) The specific pieces of Applicant Personal Information we have collected about you.

**Right to Delete Your Personal Information**. You have the right to request that we delete Applicant Personal Information we collected from you, subject to certain exceptions.

**Right to Correct Inaccurate Information**. If you believe that Applicant Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

**Right to Opt Out of Sales and Sharing of Personal Information**. We do not sell Applicant Personal Information or share it for cross-context behavioral advertising.

**Right to Limit Use and Disclosure of Sensitive Personal Information**. We do not use or disclose Applicant sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights**. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us, including retaliation against you as a job applicant.

# VIII. Text/SMS Messages

You have the choice to opt-in to receiving text messages on the mobile phone number(s) you share with us during the application process. By participating, you consent to receive text messages sent by an automatic telephone dialing system, which may contain recruiting/advertising messages. Consent to these terms is not a condition of being hired, contracted, or leased. You may opt out at any time by texting STOP to unsubscribe. You also agree that KKW's service providers receives in real time and logs your text messages with KKW.

#### IX. Analytics

Some of our websites use analytics technology provided by Google Analytics to understand how users interact with the site, improve our web experience, and better market our services. Google Analytics uses cookies and other tracking technologies to collect information about how you use the website. Personal Information collected by Google Analytics (e.g., your IP address and other usage information) may be transmitted to and stored by Google on servers in the U.S. (or elsewhere). You may exercise choices regarding the use of cookies from Google Analytics by going to <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> or downloading the Google Analytics Opt-out Browser Add-on.

#### X. Chat Function

Some of our websites offer an online chat feature that is supported by Paradox. When you use this feature, you may be disclosing information you provide in the chat to Paradox as well as to us. For more information about how Paradox processes your Personal Information, please review their privacy policy <a href="here">here</a>.

#### XI. Social Media Features

We may collect Personal Information that you share publicly on Facebook or that is part of your Facebook profile and that you allow Facebook to share with us. We receive your Facebook

profile data when you use Facebook Connect, or when you interact with us on Facebook. To learn more about how we obtain Personal Information from Facebook, or to opt out of the disclosure of such data, please review Facebook's privacy policy or update your Facebook account settings.

## XII. How to Contact Us

If you have any questions about how KKW handles your Applicant Personal Information or if you need to access this notice in an alternative format or language, please contact us at:

Phone: 1-800-955-4559 Email: PCN@kkwtrucks.com