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|--|----------------------------------|--------------------------|-----------------|
| <b>POLICY: California Consumers Data Subject Rights Under the California Consumer Privacy Act (CCPA)</b> |                                  |                          | <b>FLATIRON</b> |
| Issued by: Flatiron Construction   | Approved by: Executive Committee | Approved Date: 7/19/2021 | IT-P13          |

### Categories of Personal Information Collected


During the past 12 months, we have collected the following categories of Personal Information:

| Category  | Examples   | Reason for collection  |
|---|--|--|
| 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.   | Contract administration<br>To activate and maintain client accounts<br>To fulfill requests for or respond to inquiries about our products or services<br>To provide offers and information to you (as permitted by law) about products, services, or events offered by us or that we think may be of interest to you<br>To facilitate the recruitment process-to fulfill employer responsibilities |
| 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. | Contract administration. To activate and maintain client accounts.<br>To fulfill requests for or respond to inquiries about our products or services. To provide offers and information to you (as permitted by law) about products, services, or events offered by us or that we think may be of interest to you. To facilitate the recruitment process to fulfill employer responsibilities.     |
| 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).   | To facilitate the recruitment process. To fulfill employer responsibilities.   |
| D. Commercial information.  | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.   | Contract administration  |
| 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, voiceprints, temperature screening, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.   | Health and safety reasons  |
| F. Internet or other similar network activity.  | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.   | To activate and maintain client accounts.<br>To analyze how our websites are used and how they are performing to improve user experience, prevent fraud and abuse, and to de-bug   |
| G. Geolocation data.  | Physical location or movements.  | Health and safety reasons  |
| H. Sensory data.  | Audio, electronic, visual, thermal, olfactory, or similar information.   | Not applicable   |
| I. Professional or employment-related information.  | Current or past job history or performance evaluations.  | To facilitate the recruitment process<br>To fulfill employer responsibilities  |
| 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.   | Not applicable   |
| K. Inferences drawn from other personal information.  | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.  | To provide offers and information to you (as permitted by law) about products, services, or events offered by us or that we think may be of interest to you<br>To facilitate the recruitment process<br>To fulfill employer responsibilities   |

### Sources from which Information Collected

We collect most of this Personal Information directly from you in person, by telephone, text, or email, and/or via our website and apps. However, we may also collect information:

- from publicly accessible sources (e.g., property records);
- directly from a third party, e.g., credit reporting agencies, or customer due diligence providers;
- from a third party with your consent (e.g., your bank);
- from cookies on our website; and
- via our IT systems, including automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, and email and instant messaging systems.

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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.

**Flatiron shares your personal information for the following business purposes:**

- Auditing for website performance.
- Detecting security incidents, protecting against malicious, deceptive, or fraudulent, or illegal activity
- Debugging to identify and fix errors.
- Performing services including maintaining or servicing accounts, providing or fulfilling services.
- Verifying and maintaining the quality or safety of a service or device controlled by Flatiron.

**Consumer Rights Under the CCPA**

**Right to opt-out from the sale of personal information**

Flatiron does not sell your personal information. Nor do we share personal information for third-party marketing purposes.

**Protection against Discrimination**

You have the right to not be discriminated against by us because you exercise any of your rights under the CCPA.

**Other Rights under the California Consumer Privacy Act of 2018**

Our website and Services are intended exclusively for a commercial audience, and we provide our Services exclusively to other businesses. Therefore, the personal information we collect is not subject to all of the rights provided under the California Consumer Privacy Act of 2018 (the “CCPA”).

**Questions or Comments**

Should you have any questions, comments, or concerns about our handling of your personal information, please contact us as follows:

Email: [privacy@flatironcorp.com](mailto:privacy@flatironcorp.com).

Phone: 303-485-4050.

Mail: Privacy Officer at Flatiron Construction, 585 Interlocken Crescent Suite 900, Broomfield, CO 80021.