

PACIFIC PAPER TUBE PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES AND JOB APPLICANTS

Updated June 15, 2023

Pacific Paper Tube is committed to protecting your privacy. The information that you provide to Pacific Paper Tube, 4343 E. Fremont Street, Stockton CA 95215 (sometimes referred to as “we”, “us” or “our”) is utilized in order for us to (among other things) consider you as an employee, retain you as an employee and to maintain employment records.

This Notice to Employees and Job Applicants (“Notice”) applies to our offline and online data collection practices, including when you submit personal information for purposes of applying for and/or becoming an employee of Pacific Paper Tube, and in the course of your employment with Pacific Paper Tube, pursuant to California law, including the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”). If you are not an employee who is a California resident, this Notice does not apply to you.

Please note that if you are visiting our website or our California plant as a customer, any of your personal information collected in that capacity is subject to Pacific Paper Tube’s Privacy Policy for consumers and applicable consumer rights.

Your Consent

You should read this entire Notice before submitting information, including personal information, to us in any form. Whenever you submit personal information to us, you consent to the collection, use, disclosure, transfer, and storage of that information in accordance with this Notice.

All personal information may be used for the purposes stated in this Notice. We may make full use of all information that is de-identified, aggregated, or otherwise not in personally identifiable form.

COLLECTION OF PERSONAL INFORMATION

We may have collected or will be collecting personal information from you when you choose to voluntarily provide it for purposes of employment with Pacific Paper Tube or applying for employment with Pacific Paper Tube.

Personal Information

Pacific Paper Tube collects Personal Information, such as your name, email, mailing address, social security number, telephone number, bank information,

and your designated emergency contact information based on your onboarding for employment purpose, and to communicate with you about employment processes and employment-related issues, to ensure compliance with internal HR policies and to facilitate the employment relationship including for processing of payroll and benefits (including family health benefits), and other internal business needs.

HOW WE USE YOUR EMPLOYEE PERSONAL INFORMATION

We use Personal Information of employees for a wide range of purposes, including:

- to maintain internal employment records;
- to maintain internal financial records including paystubs and payment methods;
- to maintain health benefits; and
- in order to meet and monitor government reporting regulations, legal regulations and comply with internal HR & Payroll policies

HOW WE DISCLOSE YOUR EMPLOYEE PERSONAL INFORMATION

Service Providers and Contractors

We disclose Personal Information you provide to consultants, service providers, and contractors that we use to support our business and operations who have agreed to keep the information confidential and use it only to provide the applicable service(s) such as vendors that help us communicate with you, vendors that host our website and data, security and fraud detection vendors, and vendors who process our payroll and benefits information.

Legal Obligations

We may disclose Personal Information to outside parties (including, without limitation, governmental agencies) if required to do so 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.

RIGHTS UNDER THE CCPA AND CPRA

Under California law, as an employee, you are afforded several rights, as discussed further below, about the personal information collected about you. However, there are several exceptions that may apply. These exceptions to

the right to request to access, correct, amend, and/or delete your personal information may include our right to maintain personal information of employees for business purposes and solely internal uses reasonable aligned with the expectations of the employee, as well as to comply with any legal obligations, including maintaining proper employee records, or maintaining privilege or confidentiality of certain records, in compliance with applicable U.S. and California labor laws and legal rights.

RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED OR DISCLOSED

Personal Information Collected

We have collected the categories of personal information about California employees as described in Appendix 1 to this Notice.

Information Sold or Shared

We have not and will not sell or share personal information about California employees and job applicants.

Information Disclosed For A Business Purpose

We have disclosed the following categories of personal information about California employees and job applicants for a business or commercial purpose in the preceding 12 months:

- personal identifiers and financial information, such as name, annual salary, years of service, 401K loan(s), Roth and 401K contributions, Profit Sharing information may be shared for audit purposes
- certain job title/position and compensation level information may be shared with a payroll processing service

Requests to Know

You have the right to request that we disclose personal information we collect about you.

To make a request for any of the information set forth above (a “Request to Know”), please submit a verifiable employee request pursuant to the instructions below. You may only make a Request to Know twice within a 12-month period. We will acknowledge your Request to Know within 10 days and will attempt to respond substantively within 45-90 days.

The Request to Know must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected or

disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request.

You can make a Request to Know the personal information we have about you by sending an email to our HR/Payroll Department at payroll@pacificpapertube.com.

Once we receive your Request to Know, we will begin the process to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records.

RIGHT TO KNOW SENSITIVE PERSONAL INFORMATION COLLECTED

We collect and use your Sensitive Personal Information as described in Appendix 1.

RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION

You have the right to request the deletion of your personal information collected or maintained by us (“Request to Delete”), subject to certain exceptions permitted by law.

To make a Request to Delete, please submit a verifiable employee request pursuant to the instructions below. We will acknowledge your Request to Delete within 10 days and will attempt to respond substantively within 45-90 days.

The Request to Delete must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request. Additionally, as permitted by law, if the information requested to be deleted is necessary for us to maintain, we will not be able to comply with your request. We will notify you if this is the case.

You can make a Request to Delete by sending an email to our HR/Payroll Department at payroll@pacificpapertube.com.

Once we receive your initial request to delete, we will need to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records.

We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt-Out for 24 months as required by law.

RIGHT TO NON-DISCRIMINATION FOR EXERCISING CONSUMER PRIVACY RIGHTS

You have the right not to receive discriminatory treatment for exercising your privacy rights conferred by the California Consumer Privacy Act, including by exercising the rights specified herein.

RIGHT TO CORRECT

You have the right to request that we rectify inaccurate information about you.

Requests to Correct

To make a Request to Correct, please submit a verifiable employee request pursuant to the instructions below. We will acknowledge your Request to Correct within 10 business days and we will attempt to respond substantively within 45-90 days.

You can make a Request to Correct by sending an email to our HR/Payroll Department at payroll@pacificpapertube.com.

Once we receive your request to correct, we will need to verify that you are the person that is the subject of the request through the Verification Process.

We will review all information provided by you to us, to determine whether the information is inaccurate. We reserve the right to delete the information instead of correcting if such deletion does not impact you or you consent to the deletion.

We will inform you of our decision to deny or grant your request.

We will retain correspondence, documents and information related to any Request to Correct for 24 months as required by law.

RETENTION OF PERSONAL INFORMATION

We will retain your Personal Information for as long as it is necessary for the purposes set out in Appendix 1 and to the extent necessary to comply with our legal obligations (for example, if we are required to retain your Personal Information to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

AUTHORIZED AGENT INFORMATION

You may designate an authorized agent to make a request on your behalf under the California Consumer Privacy Act.

In order to allow an authorized agent to make a request on your behalf, please email our HR/Payroll Department at payroll@pacificpapertube.com and provide your written request and consent to an authorized agent.

When your authorized agent makes a request related to your personal information, we will require the agent to provide the above written permission. We may also require that you verify your own identity directly with us at the time such a request is made.

Changes to This Employee Notice

This Employee Notice may be revised from time to time for any reason. If this Employee Notice changes, the revised Notice will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Notice whenever you submit personal information to us.

GOVERNING LAW

This Notice along with our privacy practices will be subject exclusively to the laws of the State of California, United States of America. We make no representation that this Notice and its practices comply with the laws of other jurisdictions.

CONTACT FOR MORE INFORMATION

For information and questions about the use of your personal information or this Employee Notice or your rights under California law, you may contact our HR/Payroll Department at payroll@pacificpapertube.com or call tel: (209) 948-1341.

Pacific Paper Tube Privacy Notice for California Employees and Job Applicants - Appendix 1

Category	Examples	Collected From	Purposes	Disclosed to	Sold or Shared (Y/N)	Retention Period
Personal Identifiers	Name, signature, mailing address, years of service, birth month, telephone number, email address, date of birth, family members information, address, social security number and birthdate for benefits enrollment and financial information including bank account and routing number.	You when apply for an employee position and when you join our company as an employee. We may also collect information from other party sources, such as service providers, publicly available data, and other companies and referrals.	To maintain internal business employment records; To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account; To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies;	Consultants, service providers, and contractors that we use to support our business and operations (e.g., processing payments to employees, and providing fraud detection services) who have agreed to keep the information confidential and use it only to provide the applicable services; communications to our customers and company-wide	N	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.
Sensitive Personal Information	personal identification numbers, including social security, driver's license, passport, or state ID card numbers; account or debit or credit card numbers; consumer's geolocation; consumer's racial origin, religious beliefs, or union membership; consumer's genetic data	To maintain internal business employment records; To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account; and To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.	To maintain internal business employment records; To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account; and To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, legally mandated audits, and enforcing our legal agreements and policies.		N	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

Pacific Paper Tube Privacy Notice for California Employees and Job Applicants - Appendix 1

Category	Examples	Collected From	Purposes	Disclosed to	Sold or Shared (Y/N)	Retention Period
Personal Identifiers	Name, signature, mailing address, years of service, birth month, telephone number, email address, date of birth, family members information, address, social security number and birthdate for benefits enrollment and financial information including bank account and routing number.	You when apply for an employee position and when you join our company as an employee. We may also collect information from other party sources, such as service providers, publicly available data, and other companies and referrals.	To maintain internal business employment records; To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account; To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies;	Consultants, service providers, and contractors that we use to support our business and operations (e.g., processing payments to employees, and providing fraud detection services) who have agreed to keep the information confidential and use it only to provide the applicable services; communications to our customers and company-wide	N	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.
Sensitive Personal Information	personal identification numbers, including social security, driver's license, passport, or state ID card numbers; account or debit or credit card numbers; consumer's geolocation; consumer's racial origin, religious beliefs, or union membership; consumer's genetic data	To maintain internal business employment records; To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account; and To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.	To maintain internal business employment records; To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account; and To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, legally mandated audits, and enforcing our legal agreements and policies.		N	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.