

Promotion Execution Partners California Workforce Notice at Collection

Effective Date: April 10, 2025

Promotion Execution Partners LLC (“PEP” or “we/us/our”) collects and uses your personal information (“PI”), including sensitive PI, for the business purposes listed in the chart below for our employees, applicants, and contractors (“Workforce”). We are committed to properly handling the PI collected or processed in connection with your professional relationship with us. For more information, view our full Workforce Privacy Notice.

No Sale/Share of PI. We do not and will not sell the PI, including any sensitive PI, we collect about our Workforce or share it with third parties for cross-contextual behavioral advertising.

PI Collected. We may collect the PI and sensitive PI categories listed in the tables below. For each category, the tables also list our collection and use purposes.

PI Category	Information Collected	Business Purpose	Sold or Shared
Identifiers , such as your full name, contact information, gender, date of birth, signature, Social Security number, driver’s license or state identification numbers, and similar information for your dependents and beneficiaries.	Full name, contact information, gender, date of birth, signature, Social Security Number and similar information for your dependents and beneficiaries	<ul style="list-style-type: none">• Recruit and process employment applications or independent contractor arrangements, including verifying eligibility for engagement and conducting background and related checks• Conduct onboarding• Maintain and administer payments, payroll and employee benefit plans, including enrollment and claims handling• Maintain personnel records and complying with record retention requirements• Provide our Workforce with human resources management services and employee data maintenance and support services• Communicate with our Workforce or their emergency contacts and plan beneficiaries• Comply with applicable state and federal labor, employment, tax benefits, workers’ compensation, disability, equal employment opportunity, workplace safety, and related laws• Prevent unauthorized access to or use of PEP property, including information systems, electronic devices, network, and data• Ensure productivity and adherence to PEP policies• Conduct internal audits and investigate complaints, grievances, and suspected violations of PEP policy	No

		<ul style="list-style-type: none"> • Respond to law enforcement requests and as required by applicable law or court order • Exercise or defend the legal rights of PEP and its employees, affiliates, customers, contractors, and agents 	
California Customer Records employment and personal information , such as your name, signature, Social Security number, physical characteristics or description, photograph, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, current employment, employment history, membership in professional organizations, licenses and certifications, bank account number, credit card number, debit card number, or any other financial, medical or health insurance information.	Name, signature, Social Security number, address, telephone number, insurance policy number, education, current employment, employment history, bank account number or any other financial, medical, or health insurance information.	<ul style="list-style-type: none"> • Same purposes as for Identifiers category 	No

Protected classification characteristics under California or federal law , such as 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, reproductive health decision making, military and veteran status, or genetic information (including familial genetic information).	Age (40 years or older), race, national origin, citizenship, marital status, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status	<ul style="list-style-type: none"> • Comply with federal and state equal employment opportunity laws • Conduct internal audits, grievances, and suspected violations of PEP policy • Exercise or defend the legal rights of PEP and its employees, affiliates, customers, contractors, and agents 	No
Commercial information , such as transaction information, purchase history, and financial details.	Financial details	<ul style="list-style-type: none"> • Respond to law enforcement requests and as required by applicable law or court order 	No
Biometric information , such as certain wellness metrics.	Participation in third-party wellness programs (optional)	<ul style="list-style-type: none"> • Administer health wellness programs • Exercise or defend the legal rights of PEP and its employees, affiliates, customers, contractors, and agents 	No

<p>Internet or other similar network activity information, including all activity on PEP information systems (such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames, and passwords) and all activity on communications systems (such as phone calls, call logs, voicemails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of PEP-issued devices).</p>	<p>All activity on the PEP information systems and communication systems, pursuant to our internal policies.</p>	<ul style="list-style-type: none"> • Facilitate the efficient and secure use of PEP information systems • Ensure compliance with PEP information systems policies and procedures. • Comply with applicable state and federal laws • Prevent unauthorized access to, use, or disclosure or removal of PEP property, records, data, and information • Enhance employee productivity • Conduct internal audits and investigate complaints, grievances, and suspected violations of PEP policy • Exercise or defend the legal rights of PEP and its employees, affiliates, customers, contractors, and agents 	<p>No</p>
<p>Geolocation data, such as the time and physical location related to use of an internet website, application, or device.</p>	<p>Time related to the use of an internet website, application, or device.</p>	<ul style="list-style-type: none"> • Prevent unauthorized access, use, or loss of PEP property • Improve efficiency, logistics, and supply chain management • Ensure employee productivity and adherence to the PEP policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of PEP policy 	<p>No</p>
<p>Sensory and surveillance data, such as COVID-19 related temperature checks and call monitoring and video surveillance.</p>	<p>Video surveillance, voice recordings, photographs, and video.</p>	<ul style="list-style-type: none"> • Comply with applicable state and federal laws, including on workplace health and safety • Prevent unauthorized access, use, or loss of PEP property • Exercise or defend the legal rights PEP and its employees, affiliates, customers, contractors, and agents 	<p>No</p>

Professional or employment-related information , such as employment application information (work history, academic and professional qualifications, educational records, references), and interview notes, background check, drug testing results, work authorization, performance and disciplinary records, salary, bonus, commission, and other similar compensation data, benefit plan enrollment, participation, and claims information, leave of absence information including religious, military and family obligations, health data concerning employee and their family members.	Employment application information, current or past job history, performance evaluations, or education information	<ul style="list-style-type: none"> Recruit and process employment applications or independent contractor arrangements, including verifying eligibility for engagement, background checks, and onboarding Design and administer employee benefit plans and programs, including for leaves of absence Maintain personnel records and comply with record retention requirements Communicate with employees and their emergency contacts and plan beneficiaries Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws Prevent unauthorized access to or use of PEP property, including its information systems, electronic devices, network, and data Ensure employee productivity and adherence to PEP policies Conduct internal audits and investigate complaints, grievances, and suspected violations of PEP policy Evaluate and provide useful feedback about job performance, facilitate better working relationships, and for employee professional development Exercise or defend the legal rights of PEP and its employees, affiliates, customers, contractors, and agents 	No
Non-public education information , such as education records, degrees and vocational certifications obtained, report cards, and transcripts.	Education records, degrees, transcripts	<ul style="list-style-type: none"> Evaluate an individual's appropriateness for hire or engagement, or promotion or transfer to a new position at PEP Comply with applicable state and federal labor, employment, tax benefits, workplace safety, and related laws 	No

Sensitive PI. Sensitive PI is a type of PI consisting of specific information categories. While we collect information that falls within the sensitive PI categories listed in the table below, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a person. If you are a California resident or resident of other states that provide for the right to limit the use of Sensitive PI, please click [Limit the Use of My Sensitive Personal Information](#).

Sensitive PI Category	Information Collected	Business Purpose	Sold or Shared
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<p>Government identifiers, such as your Social Security number, driver's license, state identification card, and passport and visa information, and immigration status and documentation.</p>	<p>Social Security number, driver's license, immigration status and documentation</p>	<ul style="list-style-type: none"> • Recruit and process employment applications or independent contractor arrangements, including verifying eligibility for engagement and conducting background and related checks • Process and administer payments, payroll and employee benefit plans, including enrollment and claims handling • Maintain personnel records and comply with record retention requirements • Provide our Workforce with human resources management services and data maintenance and support services • Communicate with our Workforce or their emergency contacts and plan beneficiaries • Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws • Prevent unauthorized access to or use of PEP property, including information systems, electronic devices, network, and data • Respond to law enforcement requests and as required by applicable law or court order 	<p>No</p>
<p>Complete account access credentials, such as user names, account numbers, or card numbers combined with required access/security code or password.</p>	<p>Complete account access credentials</p>	<ul style="list-style-type: none"> • Recruit and process employment applications or independent contractor arrangements, including verifying eligibility for engagement and conducting background and related checks • Provide our Workforce with human resources management services and employee data maintenance and support services • Prevent unauthorized access to or use of PEP information systems, electronic devices, network, and data 	<p>No</p>
<p>Precise geolocation, such as physical access to a PEP office.</p>	<p>Precise geolocation, including access to the PEP office.</p>	<ul style="list-style-type: none"> • Improve safety of employees, customers, and the public regarding use of PEP property and equipment • Prevent unauthorized access, use, or loss of PEP property • Improve efficiency, logistics, and supply chain management • Ensure employee productivity and adherence to PEP policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of PEP policy • Exercise or defend the legal rights of PEP and its employees, affiliates, customers, contractors, and agents 	<p>No</p>

Racial or ethnic origin and immigration status.	Racial or ethnic origin, immigration status.	<ul style="list-style-type: none"> • Comply with federal and state equal employment opportunity laws • Perform data analytics and benchmarking • Conduct internal audits and investigate complaints, grievances, and suspected violations of PEP policy 	No
Mail, email, or text messages contents not directed to PEP.	Mail, email, or text messages contents not directed to PEP.	<ul style="list-style-type: none"> • Conduct internal audits and investigate complaints, grievances, and suspected violations of PEP policy • Exercise or defend the legal rights of PEP and its employees, affiliates, customers, contractors, and agents 	No
Health information, including job restrictions and workplace illness and injury information.	Health information, including job restrictions and workplace illness and injury information.	<ul style="list-style-type: none"> • Investigate and process workers' compensation claims • Process health insurance claims 	No

Retention of Information. We will keep your PI for as long as necessary to fulfill the purposes we collected it for and in accordance with our internal document retention policy and any applicable laws. We will retain and use PI as long as you have a professional relationship with us. Thereafter, we will keep your PI for as long as is necessary (1) to protect our legal interests; and (2) to keep records required by law. We will not retain your PI for longer than necessary for the purposes set out in our [Workforce Privacy Notice](#). Different retention periods apply for different types of PI.

If you have any questions about this Notice or need access to this Notice in an alternative format, please contact us at privacy@peppromotions.com.