



Updated: January 1, 2023

Employee Notice at Collection - California Consumer Privacy Act (“CCPA”)

Schindler Elevator Corporation (“Schindler”) is providing this Employee Notice at Collection (“Employee Notice”) to California residents in accordance with California Civil Code Sec. 1798.100(b). This Employee Notice describes the categories of Employee Personal Information that may be collected by Schindler and the purposes for which Employee Personal Information may be used. It also provides information concerning Schindler’s record retention practices and rights you may have under the CCPA. For additional information about the Company’s data privacy practices, please review our [Privacy Policy](#).

Categories of Personal Information That May Be Collected

Identifiers and Contact information. This category includes names, addresses, telephone numbers, mobile numbers, email addresses, dates of birth, Social Security numbers, driver’s license or state identification numbers, bank account information, and other similar contact information and identifiers.

Protected classification information. This category includes characteristics of protected classifications under California or federal law.

Internet or other electronic network activity information. This category includes without limitation:

- all activity on Schindler’s information systems, such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames and passwords
- all activity on Schindler’s communications systems including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an Employee’s use of Schindler-issued devices

Geolocation data. This category includes GPS location data from Schindler-issued mobile devices and Schindler-owned vehicles.

Audio, electronic, visual, thermal, olfactory, or similar information. This category includes, for example, information collected from camera and similar devices.

Biometric information. This category includes fingerprint scans and related information, and certain wellness metrics.

Professional and employment-related information. This category includes without limitation:

- data submitted with employment applications including salary history, employment history, employment recommendations, etc.
- background check and criminal history
- work authorization
- fitness for duty data and reports

- performance and disciplinary records
- salary and bonus data
- benefit plan enrollment, participation, and claims information
- leave of absence information including religious and family obligations, physical and mental health data concerning employee and his or her family members

Education information. This category includes education history.

Inferences drawn from the PI in the categories above. This category includes engaging in analytics, including but not limited to, identifying certain correlations about individuals and success on their jobs, analyzing data to improve retention, and analyzing employee preferences to inform HR Policies, Programs and Procedures.

Sensitive Personal Information. This category includes sensitive information such as:

- social security, driver's license, state identification card, or passport number,
- financial account information that allows access to an account, including log-in credentials, financial account numbers, passwords, etc.,
- precise geolocation,
- racial or ethnic origin, religious or philosophical beliefs, or union membership,
- content of mail, email, and text messages unless the Company is the intended recipient of the communication,
- genetic data,
- biometric information for the purpose of uniquely identifying a consumer, and
- information concerning health and sex life or sexual orientation.

Purposes Personal Information May Be Used

- Collect and process employment applications, including confirming eligibility for employment, background and related checks, onboarding, and related recruiting efforts.
- Processing payroll and employee benefit plan and program design and administration including enrollment, claims handling, and leave of absence administration.
- Maintaining personnel records and record retention requirements.
- Communicating with employees and/or employees' emergency contacts and plan beneficiaries.
- Complying with applicable state and federal labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws.
- Preventing unauthorized access to, use, or disclosure/removal of Schindler's property, including Schindler's information systems, electronic devices, network, and data.
- Ensuring and enhancing employee productivity and adherence to Schindler's policies.
- Investigating complaints, grievances, and suspected violations of Schindler policy.
- Design, implement, and promote Schindler's diversity and inclusion programs.
- Facilitate the efficient and secure use of Schindler's information systems.
- Ensure compliance with Schindler information systems policies and procedures.

- Improve safety of employees, customers and the public with regard to use of Schindler property and equipment.
- Improve efficiency, logistics, and supply chain management.
- Improve accuracy of time management systems.
- Evaluate an individual's appropriateness for a participation position at Schindler, or promotion to a new position.
- Design, implement, and promote Schindler's diversity and inclusion programs.
- Customer engagement and other legitimate business purposes.

Schindler may add to the categories of Employee Personal Information it collects and the purposes it uses Employee Personal Information. In that case, Schindler will inform you.

Disclosure. Schindler does not sell or share, as those terms are defined under applicable law, the above categories of Employee Personal Information. We do not use or disclose your Sensitive Personal Information for purposes that, with limited exceptions, are not necessary for the employment related purposes for which we collect it or as reasonably expected by an average individual in this context, for other permitted purposes under the CCPA, or as authorized by regulation.

To carry out the purposes outlined above, Schindler may disclose Employee Personal Information with third parties such as background check vendors, third-party human resources, information technology vendors, cloud service providers, outside legal counsel, and state or federal governmental agencies.

For additional information on how we disclose Employee Personal Information or the categories of sources from whom we collect Employee Personal Information, please see our [Privacy Policy](#).

Retention. We retain Employee Personal Information for as long as it is necessary to achieve the purposes for which we collect it, for purposes that are reasonably compatible with the original purposes for collecting your information, and in accordance with our data retention schedule. We may retain Employee Personal Information for longer if it is necessary to comply with our legal or reporting obligations, resolve disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. To determine the appropriate retention period for Employee Personal Information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process Employee Personal Information; and applicable legal requirements. We may also retain Employee Personal Information in a deidentified or aggregated form so that it can no longer be associated with you. Personal information does not include certain categories of information, such as publicly available information from government records, and deidentified or aggregated consumer information.

California Resident Individual Rights Requests. Employees who are residents of the State of California have certain individual rights with respect to their Personal Information. You can obtain information about these rights and how to exercise them by visiting our [Privacy Policy](#) or contacting us at uswebmaster.us@schindler.com.

Changes to Notice. We reserve the right to amend this Employee Notice at any time without advance notice.

Questions. If you have questions about this notice, you may call your Human Resources Business Partner, Ashely Loftus at ashley.loftus@schindler.com.