



California and Canada Worker Privacy Notice

Last Updated: **August 1, 2026**

Galls, LLC (“**Company**” or “**Galls**”), along with its subsidiaries and affiliated companies, including but not limited to **US Patriot, LLC**, take your privacy seriously. We want you to know how we collect, use, and disclose your personal information.

Notice at Collection for California Residents

Company collects the personal information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 5. We do not sell your personal information or disclose it for cross-context behavioral advertising (“**sharing**”). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you. To the extent you provide Company with personal information about your dependents, spouse, beneficiaries, or emergency contacts, you are responsible for providing this notice to them.

Assistance For The Disabled

Alternative formats of this Privacy Notice are available to individuals with a disability. Please contact humanresource@galls.com for assistance.

This Privacy Notice explains:

1. The categories of personal information we collect about you
2. The categories of sources from which we collect your personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. Exercising privacy rights
6. Additional region-specific information
7. Changes to this Privacy Notice

Scope:

This Privacy Notice applies to the personal information of residents of California and Canada who are (a) employees, (b) independent contractors, interns, volunteers, owners, board members, and other individuals who perform work for Company (collectively “**Non-Employee Workers**”), and (c) employees’ and Non-Employee workers’ dependents, emergency contacts, and beneficiaries (“**Related Contacts**”), (all collectively, “**Workers**”) in their role as Workers. This Privacy Notice informs Workers about the categories of personal information Company has collected about them in the preceding twelve months as well as the categories of personal information that the Company will collect about HR Individuals in the future.

Except where the Privacy Notice specifically refers only to a specific category of Workers, e.g., employees, this Privacy Notice refers to all categories of Workers collectively.

“**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 a particular Worker.

1) THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We may collect the following categories of personal information. Not all categories may be collected about every Worker.

A. Employees

- **Identifiers**, for example, real name, alias, telephone number, postal address, e-mail address, signature, bank account name and number for direct deposits, Social Security number for tax purposes, driver's license number, and photographs.
- **Professional or Employment-Related Information**, for example, educational institutions attended, degrees and certifications, licenses, work experience and previous employers, professional memberships and affiliations, union representation, seniority, training, employment start and ending dates, and job title.
- **Compensation and Benefits Information for Employees**, for example, salary, bonus and commission; equity compensation information; hours and overtime; leave information; bank details (for payroll and reimbursement purposes only), benefits in which you may be enrolled; health plan information; and identifying information for dependents and beneficiaries.
- **Background check reports**, for example, criminal history, to the extent permitted by applicable law.
- **Non-Public Educational Information**, for example, academic transcripts.
- **Commercial Information**, for example, business travel and expense records.
- **Internet or Other Electronic Network Activity Information**, for example, Internet browsing and search history while using Galls' network, log in/out and activity on Galls' electronic resources, interactions with Galls' Internet website, application, or advertisement, and publicly available social media activity.
- **Sensory or Surveillance Data**, for example, voicemails, recordings of meetings or videoconferences, and footage from video surveillance cameras.
- **§ 1798.80 Information**: personal information described under Cal. Civ. Code § 1798.80 to the extent not already included in other categories here, such as benefit information to administer short- and long-term disability benefits as well as other benefit plans or health information in a health emergency or to conduct pre-employment physical examinations.
- **Preferences**, for example, information voluntarily disclosed through Company intranet or chat functions, including hobbies and leisure activities, membership in voluntary/charitable/public organizations, and preferences regarding work tools, travel, hours, food for company events, etc.
- **Inferences**, for example, Company might infer characteristics from activity on the Galls' electronic resources, e.g., willingness to try new technologies.
- **Characteristics of Protected Classifications Under California or Federal Law for Employees**, for example, race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations and to support diversity and inclusion programs; disability, medical condition, and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary to comply with Federal and California law related to leaves of absence and accommodation; and marital and familial status as necessary to provide benefits to employees and for tax purposes.
- **Geolocation Data**, for example, GPS tracking on Company vehicles, logging in to a VPN network, or through a radio frequency identification (RFID) chip in a security badge that tracks entry and exit location(s) within Galls' facilities.

B. Non-Employee Workers

- In regard to Non-Employee Workers, Company collects the categories of personal information listed in Section 1.A, above, *excluding* the following categories: (a) Compensation and Benefits Information for employees; and (b) Characteristics of Protected Classifications Under California or Federal Law for employees.
- In addition, Company collects the following personal information regarding Non-Employee Workers:
 - Compensation: amounts paid to Non-Employee Workers for services rendered.

C. Related Contacts

- Galls only collects contact information about emergency contacts.
- Galls may collect the following categories of personal information about spouses or domestic partners, dependents, and beneficiaries: (a) Identifiers; (b) Commercial Information if, for example, Company arranges travel for a dependent to attend a Company event; (c) Internet Activity Information if the individual uses Company electronic resources and websites; (d) Sensory or Surveillance Data if the individual enters Company facilities; (e) § 1798.80 personal information, such as insurance policy numbers if the individual is covered by Company insurance or health information and (f) Protected Categories of Personal Information, for example, childbirth to administer parental leave, marital status to pay taxes, and familial status to administer benefits.

2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

We may collect personal information from the following categories of sources. Not all categories apply to every Worker.

- **You**, for example, in your application, forms you fill out for us, assessments you complete, surveys you submit, and any information you provide us during the course of your relationship with us.
- **Your spouse or dependent** with respect to their own personal information.
- **Vendors and service providers**, for example, law firms.
- **Affiliated companies**, for example, when an employee works on a cross-enterprise team.
- **Third parties**, for example, job references, business partners, professional employer organizations or staffing agencies, and insurance companies.
- **Public internet sources**, for example, social media, job boards, public profiles, and other public online sources
- **Public records**, for example, court records, and credentialing and licensing organizations.
- **Automated technologies** on Galls' electronic resources, for example, to track logins and activity across Company network.
- **Surveillance/recording technologies installed by Galls**, for example, video surveillance in common areas of Company facilities, global positioning system ("GPS") technologies, voicemail technologies, webcams, audio recording technologies, and Bluetooth technologies, any of these with consent to the extent required by law.
- **Government or administrative agencies**, for example, law enforcement, public health authorities, California Department of Industrial Relations, Employment Development Department.
- **Acquired company**, if Company acquired your employer, Company might collect personal information from that employer.

3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

We may use the personal information we collect for one or more of the following purposes:

A. All Workers

Managing Personnel, including:

(Not applicable to Related Contacts)

- **Administration, including:**
 - To manage personnel and workforce matters
 - To communicate with the workforce
 - To plan and arrange work supplies and workspaces
 - To fulfill recordkeeping and reporting responsibilities
 - For recruitment of new Workers
 - To resolve internal grievances and disciplinary issues
 - To make business travel arrangements

- To manage workforce-related emergencies, including health emergencies
- **Workforce development, including:**
 - To screen workforce for risks to Galls and continued suitability in their positions
 - To conduct surveys
- **Team-building, including:**
 - To maintain an internal workforce directory and for purposes of identification
 - To facilitate communication, interaction, and collaboration among Workers
 - To arrange meetings and manage Company-sponsored events and public service activities
 - To promote Galls as a place to work
 - Workforce reporting and data analytics/trend analysis
 - For workforce satisfaction

Monitoring, Security, and Compliance, including:

- To monitor access to, and use of, Company facilities and information systems
- To ensure compliance with applicable laws and Company policies
- To conduct internal audits and investigations
- To administer Galls' compliance hotline
- To protect the safety and security of Galls' facilities, including preventing illicit activity
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise Galls' rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

Conducting Our Business, including:

(Not applicable to Related Contacts)

- To engage in marketing, advertising, and promotion
- For communications with prospective, current, and former customers
- To provide a directory and contact information for prospective and current customers and business partners
- For customer service purposes
- To manage business expenses and reimbursements
- To engage in project management
- To conduct product and service training
- To conduct research and development
- To conduct quality assurance and improvement
- For event planning
- To engage in crisis management

Miscellaneous Other Purposes:

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, and strategic planning
- To manage litigation involving Company and other legal disputes and inquiries and to meet legal and regulatory requirements
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Company or any of its subsidiaries or affiliates
- To manage licenses, permits, and authorizations applicable to Galls' business operations
- To protect the rights, property, or safety of Company, Workers, customers or others

B. Employees

1. Generally Applicable Purposes

Unless stated otherwise in section 3.B.2, below, we may use employees' personal information for the following purposes:

Managing Employees, including:

- **Administration, including:**
 - To set up and manage a personnel file
 - To manage performance
 - To administer compensation, bonuses, equity grants, other forms of compensation, and benefits (as permitted by law)
 - To manage vacation, personal time off and other leaves of absence
 - To track hours and attendance
- **Employee development, including:**
 - To provide, evaluate, and manage training and career development
 - To evaluate job performance and consider employees for other internal positions or promotions
 - To assist with professional licensing
 - To develop a talent pool and plan for succession
- **Team-building, including:**
 - For diversity and inclusion programs
 - To arrange team-building activities
 - To design employee retention programs

2. Purposes Specific To Certain Categories Of Employees' Personal Information

We may use the categories of employees' personal information listed in this Section 3.B.2 for the purposes stated below:

Purposes For Using Employees' Geolocation Data:

- Galls will issue employees an RFID-enabled security badge that tracks employees' entry and exit location(s) within Galls' facilities.

Purposes For Using Employees' Health Information:

- To the extent necessary to comply with Galls' legal obligations, such as to accommodate disabilities
- To provide health benefits
- To conduct a direct threat analysis in accordance with the Americans with Disabilities Act and state law
- For workers' compensation purposes
- For occupational health surveillance
- For occupational health and safety compliance and recordkeeping
- To administer leaves of absence and personal time off
- To provide a wellness program
- To respond to an employee's medical emergency

Purposes For Using Employees' Protected Categories Of Information:

- Galls collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, the Office of Federal Contracting Compliance Programs (applicable to government contractors), and state laws, where applicable, such as the California's Fair Employment and Housing Act.
- Galls also collects information about disability status to the extent an employee may need special assistance during emergencies from Galls or from first responders.
- Galls also collects the following characteristics (in addition to those listed above) for its diversity and inclusion programs (including analytics): (a) religion, (b) sex, (c) gender, (d) pregnancy, (e) childbirth, (f) breastfeeding or

related medical conditions, (g) sexual orientation, (h) disability, (i) gender identity, (j) gender expression, (k) marital status, (l) age, (m) familial status, or (n) ancestry.

- In addition, Galls uses this personal information for purposes including:
 - with respect to disability, medical condition, familial status, marital status, and pregnancy, childbirth, breastfeeding, and related medical conditions: as necessary to comply with Federal and California law related to leaves of absence and accommodation;
 - with respect to military and veteran status: as necessary to comply with leave requirements under applicable law and for tax purposes;
 - with respect to age: incidentally to the use of birth date for birthday celebrations and identity verification;
 - with respect to religion and pregnancy, childbirth, breastfeeding, and related medical conditions: as necessary for accommodations under applicable law;
 - with respect to protected classifications, such as national origin: to the extent this information is contained in documents that you provide in I-9 documentation; and
 - with respect to marital status and familial status: for Company events and as necessary to provide benefits and for tax purposes.

Note: Galls collects personal information about membership in protected categories on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

C. Non-Employee Workers

Managing Non-Employee Workers, including:

- To evaluate the individual's qualifications for engagements, including licensure and certifications
- To negotiate and execute the agreement with the individual
- To provide orientation and familiarization with Galls' working environment
- To administer the contractual relationship, including payments
- To manage absences

D. Owners/Board Members

Board Members:

- To evaluate qualifications for the role
- To administer the relationship
- To administer compensation, bonuses, equity grants, other forms of compensation, and benefits (as applicable and as permitted by law)
- To monitor compliance with Company policies and administer discipline

E. Related Contacts

Spouse and Dependents/Beneficiaries:

- To manage and administer benefits
- To communicate with the individual and manage the relationship
- To arrange travel to, and manage participation in, Company events

Emergency Contacts:

- To communicate in the event of an emergency involving the individual who provided the emergency contact's information

4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

Galls generally maintains personal information related to Workers as confidential. However, from time to time, Company may have a legitimate business need to disclose personal information for one of the purposes listed in Section 3, above, to one or more of the categories of external recipients listed below. In that event, Galls discloses your personal information listed in Section 1, above, only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by applicable laws.

- **Your direction:** We may disclose your personal information to third parties at your direction.
- **Service providers and contractors:** Galls discloses your personal information to service providers and contractors to assist us in meeting our business needs and contractual and legal obligations.
 - Service providers and contractors include auditors, administrative service providers, law firms, travel agencies, benefits providers, and any other entity providing services to Galls.
- **Affiliated companies:** Other companies within the Galls, LLC family of companies.
- **Customers:** This may include, for example, disclosing a sales representative's contact information to clients.
- **Business partners:** For example, Galls might disclose your business contact information to a co-developer of a new product or service with which you will be working.
- **Government or administrative agencies:** These may include, for example:
 - Internal Revenue Service to pay taxes;
 - Employment Development Department as required for state payroll taxes and to respond to unemployment or state disability insurance claims;
 - OSHA as required to report work-related death or serious injury or illness;
 - Department of Fair Employment and Housing as required to respond to employment charges; and
 - California Department of Industrial Relations as required to resolve workers' compensation claims.
- **Public:** Galls may disclose your personal information to the public as part of a press release, for example, to announce promotions or awards. If you do not want your personal information in press releases, please submit your request through the Smartsheet process listed in Section 6)b. below. Galls does not disclose sensitive personal information to the public.
- **Required Disclosures:** We may be required to disclose personal information (a) in a court proceeding, (b) in response to a court order, subpoena, civil discovery request, other legal process, or (c) as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Company, our users, or others.
- **Corporate Transactions:** We may disclose your personal information in connection with a corporate merger, consolidation, bankruptcy, the sale of all, or substantially all, of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

Galls keeps your personal information no longer than necessary for the purposes described in Section 3 above and in accordance with our Galls Record Retention Schedule available in the confidential Shared Human Resources Drive, unless retained longer to comply with the law or to defend against legal claims.

6) EXERCISING PRIVACY RIGHTS

A. Privacy Rights

Subject to applicable law, Workers may have the following rights:

- **Right to Know:** The right to know the personal information collected about you and Galls' collection, use, and disclosure of your personal information.
- **Right to Delete:** The right to obtain the deletion of personal information that you have provided to Galls.
- **Right to Correct:** The right to obtain the correction of inaccurate personal information maintained by Galls, taking into account the nature of the personal information and the purposes of processing the personal information.
- **Right to Withdraw Consent:** You may withdraw consent to the use and disclosure of your personal information to the extent that we rely on consent as the legal basis for processing your personal information. Please bear in mind that, if you withdraw consent to the use and disclosure of personal information necessary for your employment or engagement, e.g., to pay you, we may not be able to continue to employ you or engage you. Your withdrawal of consent does not apply to use and disclosure of your personal data that occurred prior to the withdrawal.

B. How to Exercise Your Rights

Galls will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call Galls' Toll-Free Hotline: 833-896-0007
- Smartsheet Process: <https://app.smartsheet.com/b/form/c7ead225398d46d7866b6fa21b1c73f2>

C. How We Will Verify Your Request:

We match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (e.g., a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

D. Authorized Agents

You may designate an authorized agent to exercise your right to know, to correct, or to delete. If an authorized agent submits on your behalf, the authorized agent must submit with the request either (a) a power of attorney, signed by you, that is valid under applicable law; or (b) another document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity. In the alternative, you can provide a power of attorney compliant with applicable law.

E. Galls' Non-Discrimination and Non-Retaliation Policy

Galls will not unlawfully discriminate or retaliate against you for exercising your legal rights.

7) ADDITIONAL REGION-SPECIFIC INFORMATION

A. For Non-U.S. Residents

Because the Galls family of companies is a multinational company based in the United States, your personal information may be transferred to U.S. headquarters for the purposes described in Section 3, above.

B. For Residents of California

No Sales or Targeted Advertising: Galls does not sell or “share” (disclose to a third party for cross-context behavioral advertising) your personal information in connection with the HR relationship. In addition, we have no actual knowledge that we sell or share the personal information of individuals of any age in connection with the HR relationship, including the personal information of children under 16.

Note on inferring characteristics: Galls does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about the Worker.

Note on Deidentified Information: At times, Galls may convert personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual (“**Deidentified Information**”). Galls maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that Company may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual.

Galls may disclose each of the categories of personal information listed in Section 1, above, for the following “business purposes”, as that term is defined under the CCPA:

- **Service providers:** Galls may disclose to service providers any of the categories of personal information listed in Section 1, above, for the business purpose of performing services on Galls’ behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by Galls:** Galls may disclose the categories of personal information listed in Section 1, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on the Galls’ behalf.
- **Affiliated companies:** Galls may disclose any of the categories of personal information listed in Section 1, above, to other companies within the Galls family of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) short-term transient use, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

7) CHANGES TO THIS PRIVACY NOTICE

If we change this Privacy Notice, we will post those changes on this page and update the Privacy Notice modification date above. If we materially change this Privacy Notice in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

For More Information

For questions about our privacy practices, please contact our privacy officer at privacy@galls.com.

For questions or concerns about Galls’ privacy policies and practices, please contact us at humanresource@galls.com.