

# Legrand North and Central America

## Notice of Employment Privacy Practices for California Residents

**Effective Date:** January 1, 2020

This **Notice of Employment Privacy Practices for California Residents (the “Notice”)** applies solely to California Residents whose personal information is collected by Legrand North and Central America (“LNCA,” “Company” or “We”) in the following situations:

- In connection with a job application;
- In connection with being an employee of, owner of, director of, officer of, or contractor of LNCA (collectively referred to as “Workforce Member”), to the extent that the personal information is collected and used by LNCA solely within the context of such role or former role as a Workforce Member of LNCA.
- In connection with emergency contact information of a Workforce Member, to the extent that the personal information is collected and used solely within the context of having an emergency contact on file.
- Personal information that is necessary for the business to retain to administer benefits for another natural person relating to the Workforce Member to the extent that the personal information is collected and used solely within the context of administering those benefits.

We refer to such California Residents as the “Individual” or “You” throughout this Notice.

We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice.

### **Information We Collect**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Individual (“**personal information**”). In particular, for the purposes of this Notice, LNCA has collected the following categories of personal information about Individuals within the last twelve (12) months:

<b>Category:</b>	<b>This Includes:</b>	<b>Collected?</b>
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.	YES
B. Personal information categories listed	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state	YES

in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<p>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, and make/model of vehicle and license plate information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	
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).	YES
D. 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, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
E. Professional or employment-related information	Current or past job history or performance evaluations, date of hire, compensation, and reporting manager.	YES
F. Internet or other electronic network activity information	Browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	YES
G. Geolocation data	Information collected through GPS technology.	YES
H. Inferences	Inferences drawn from any of the information identified in this subdivision to create a profile about You reflecting Your work preferences, characteristics, behavioral traits, and thinking styles.	YES
I. Audio and Video data	Information collected from audio and video surveillance equipment used in public employment spaces.	YES

For the purposes of this Notice, and in accordance with CCPA, personal information does not include:

- Publicly available information from government records;
- De-identified or aggregated personal information; or
- Other information excluded from the CCPA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and the California Confidentiality of Medical Information Act (“CMIA”) or clinical trial data.
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FRCA”), the Gramm-Leach-Bliley Act (“GLBA”) or California Financial Information Privacy Act (“FIPA”), and the Driver's Privacy Protection Act of 1994.

### **How We Collect Information**

LNCA obtains the categories of personal information listed above from the following categories of sources:

- Directly from You. For example, from forms You complete in connection with Your job application or application for LNCA benefits. We will also collect the personal information You provide to us throughout the duration of Your employment with LNCA;
- From Our service providers. For example, for any new hires, We will collect background check information and drug screening results regarding any such new hire from a third-party vendor that performs a service on LNCA’s behalf;
- From Workforce Members. For example, if a Workforce Member provides Your personal information as a reference in connection with a job application or in connection with an application for LNCA-provided benefits;
- From benefits administrators. We may receive information, including filed insurance claims, about You and Your dependents and beneficiaries from the companies that administer the benefits plans offered by LNCA; or
- From third parties. For example, a recruiter may provide Your information to us in connection with our search for a Workforce Member.

### **Use of Personal Information**

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

- To support LNCA’s organizational and operational functions;
- To provide services and benefits to You as a LNCA Workforce Member;

- To properly administer LNCA’s workforce and its benefits and compensation programs;
- To evaluate Your candidacy or performance as a LNCA Workforce Member;
- To respond to law enforcement requests and as required or permitted by applicable law, court order, subpoena, or governmental regulations;
- To ensure Your compliance with LNCA’s policies;
- As directed by You; or
- As otherwise described to You when collecting Your personal information or as otherwise set forth in the CCPA.

### **Sharing Personal Information**

In connection with LNCA’s collection and use of Your personal information as described above, LNCA may disclose Your personal information in the following ways:

- With Our parent company, subsidiaries and affiliates;
- With parties to transactions and potential transactions whereby we sell, transfer or otherwise share some or all of our business or assets, including your employment information, such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution;
- With service providers and benefits administrators. For example, this includes providers of products and services to LNCA such as payroll administration, benefits and wellness providers, human resources services, occupational health services, performance management, training, expense management, travel agencies, transportation and lodging providers, benchmarking services, IT systems and support, background check providers, equity compensation administration services, corporate banking and credit card providers, health care providers, trade associations, claims handlers and loss adjusters, accountants, auditors, insurers, lawyers, and any necessary third party administrators, nominees, registrars or trustees appointed in connection with benefits plans or programs.;
- As directed by You;
- To comply with the law or to protect the Company. This includes but is not limited to responding to audits, court orders or subpoenas, or defending LNCA in a lawsuit. This also includes sharing Your personal information if a government agency or investigatory body requests this data. We may share also information when We are investigating an allegation or potential fraud; or
- As otherwise described to You when collecting Your personal information or as otherwise set forth in the CCPA.

### **Changes to Our Notice**

LNCA reserves the right to amend this Notice at our discretion and at any time. When We make changes to this Notice, We will update the Notice's effective date and make available the updated Notice as required by law.

**Contact Information**

If You have any questions or comments about this Notice, the ways in which LNCA collects and uses Your information described below, please do not hesitate to contact us at:

**Email:** [av.human.resources@legrand.com](mailto:av.human.resources@legrand.com)

**Postal Address:**       Legrand AV  
                              6436 City West Parkway  
                              Eden Prairie, MN 55369

**Phone:** 1 (866) 977-3901