



## California Consumer Privacy Act: Applicants & Employees

Effective Date: January 1, 2020

### **SP Plus California Consumer Privacy Act – Applicant & Employee Privacy Policy**

Effective January 1, 2020, The California Consumer Privacy Act (“CCPA”) gives job applicants and actual employees the right to know the categories of personal information SP Plus Corporation (“SP Plus”), may collect from them and how such information can be used. We adopted this Employee Privacy Policy (“Privacy Policy”) to comply with the CCPA, to supplement our Employee Handbook (which has or will be provided to you if you commence employment with us), and to notify you of our information gathering and dissemination practices during your potential or actual employment with SP Plus (“Employment”). References in this Privacy Policy to “we,” “us,” or “our” mean SP Plus (and its successors, assigns, and affiliated entities) and references to “you” and “your” mean you the actual or prospective employee.

If you have a disability are unable to access, read or understand this notice. Please send an e-mail to: [benefits@spplus.com](mailto:benefits@spplus.com) or speak with your manager or Employer contact (e.g., recruiter for an applicant).

**Information We Collect and Use:** When applying for Employment, onboarding as an employee, or during your performance of services relating to your Employment, we may collect the following information from you and use it for the purposes described in this Privacy Policy and our written policies, including without limitation the Employee Handbook:

- **Identifiers including real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, signature, account name, telephone number, social security number, driver’s license number, passport number, or other similar identifiers (collectively, the “PII”)** (see also Cal. Civ. Code § 1798.80(e)). We use your PII for employee-related purposes including without limitation to: contact you when necessary regarding your obligations, SP Plus events, and other notices; send you information about SP Plus, its products or services, and information you’ve requested; process your payroll, benefits, taxes, and expenses; create work schedules; and share your information, as necessary, with our human resources service providers, payroll processors, benefits vendors, insurance providers, accountants, legal counsel, and other third parties in connection to the general operations of SP Plus and its contractual and statutory obligations as your potential or actual employer. The information may be used recruiting purposes (including but not limited to: To evaluate applicants’ qualifications for employment with SP Plus; to conduct a background screening/check; to communicate with applicants; To coordinate travel; For diversity and inclusion purposes; To arrange and manage SP Plus-sponsored events; To create a talent pool for future job openings; For recordkeeping purposes; To demonstrate applicants’ agreement to documents presented, e.g., acknowledgement of employment application, offer letter). Monitoring, Security and Compliance (including but not limited to: To evaluate and improve the recruiting process; To monitor use of Company information systems and other electronic resources; To conduct internal audits; To conduct internal investigations; To report suspected criminal conduct to law enforcement and cooperate in investigations; To protect the safety and security of SP Plus’s facilities).



## California Consumer Privacy Act: Applicants & Employees

You may be asked to provide additional PII, including without limitation your citizenship information, household information (e.g., the names, birthdates, sex and age of your spouse, children and other beneficiaries), vehicle information (e.g., the model, year and license number), emergency contact information, medical information, benefit elections, health insurance information, bank account number, or any other financial information, and your work schedule availability. If you provide us with personally identifying information of individuals other than yourself, you represent that you are authorized and received consent from such third party to provide us with such information and to use it as disclosed herein.

- **Professional or Employment-Related Information.** Evaluations, membership in professional organizations, professional certifications, academic transcripts, degree/certifications earned and employment history. These may be used in the applicant-review and hiring process including to determine an applicant/employee's qualification for employment.
- **Characteristics of protected classifications under California or federal law.** This information will be used for our record keeping purposes and to access and improve our employee policies, operations, and outreach. SP Plus 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 federal Office of Contracting Compliance Programs (applicable to government contractors), and California's Fair Employment and Housing Act, and for purposes of diversity analytics. SP Plus uses this Personal Information for purposes including: with respect to disability and/or medical condition, as necessary, to comply with Federal and California law related to accommodation; and with respect to age, to verify that applicants are at least 18 years of age.

SP Plus collects this category of Personal Information on a purely voluntary basis, except where collection is required by law, and uses the information only in compliance with applicable laws and regulations.

- **Biometric or geometric information.** You may need to provide us with information regarding your height, weight, shirt, pants, or shoe size to receive proper uniform (if applicable) to be worn during your Employment. We may also make a record of your behavior, attitudes, and abilities as it relates to your Employment to decide whether to offer you a job or promotion or provide you with performance reviews. We may also use 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, as well as any other facial or finger/hand markers in order to be used for time clock/keeping purposes. We may also geometric/geolocation data for purposes of time clock/keeping purposes.
- **Internet or other electronic network activity information,** including, but not limited to, browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement. We may log the name of your Internet service provider, IP address, or use "cookie" technology to store your preferences, browsing history, and record session information as you log into and use SP Plus employee software,



## California Consumer Privacy Act: Applicants & Employees

electronic mail systems, voice mail systems, computer systems, websites or when using SP Plus's computers, tablets, and other equipment (collectively, the "Technology Resources"). All messages sent and received, including personal messages and all data and information stored on Technology Resources are SP Plus property regardless of the content. SP Plus may monitor and store internet, electronic files, messages, mail, other digital archives, and the use of electronic communications as necessary to ensure that no misuse or violation of SP Plus policy or any law occurs. Employees should have NO expectation of privacy in using any Technology Resources, or any information or communications related to business matters stored on personal equipment. Employees who delete or erase information or messages should not assume that such information or messages are confidential. We may use your information collected through its Technology Resources to customize and tailor your experience on our Technology Resources and improve our employee policies, operations, and outreach, as well as to monitor use SP Plus information systems and other electronic resources or information systems; to conduct internal audits or investigations; to protect the safety and security of the SP Plus's facilities.

- **Audio, electronic, visual, thermal, olfactory, or similar information.** As further discussed in our Employee Handbook, we may video record you during your shifts or when you are physically at one of SP Plus's locations or offices. Additionally, if you are at a SP Plus sponsored event where photos or video recordings are taken, we may use images or recordings of you at such events for our promotional and marketing purposes.
- **Sensory or Surveillance Data.** SP Plus collects sensory or surveillance data, including the following: footage from video surveillance cameras. SP Plus uses this Personal Information for purposes including to protect the safety and security of SP Plus facilities and personnel through video surveillance.
- **Professional or employment-related information and educational information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA).** We may use this information to assess whether to offer you Employment or promote your position or expand your responsibilities as an employee of SP Plus.
- **Miscellaneous.** SP Plus may track whether applicant or employee relatives work for SP Plus, for the purpose of addressing potential conflicts of interest.
- **Other Uses.** We also collect information as we deem necessary to track/verify compliance with federal, state, and local laws and for our general record-keeping purposes including but not limited to company reporting obligations, including headcount, management information, demographic and Health, Safety, Security and Environmental reporting. We may disclose your information in response to a court order, when we believe we must do so by law and/or whenever we deem it appropriate or necessary to inform law enforcement authorities. Additionally, we reserve the right to share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. We will not provide you with notice before disclosure in such cases.



## California Consumer Privacy Act: Applicants & Employees

**In addition to what is described above and incorporating any overlap, the information listed above may be used for any of the following:**

- To Administer Benefits, such as medical, dental, optical, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance and accident management and provision of online total reward information and statements.
- To Pay and Reimburse for Expenses, including salary administration, payroll management, payment of expenses, to administer other compensation related payments, including assigning amounts of bonus payments to individuals, administration of departmental bonus pools and administration of stock option payments.
- To Conduct Performance-Related Reviews, as well as establish training and/or development requirements, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring.
- To Conduct workplace investigations and investigate employee work-related claims, including gathering evidence for disciplinary action or termination. This may also include workers compensation investigations.
- To Ensure a Safe and Efficient Working Environment, which includes SP Plus actions relating to disciplinary actions, and code of conduct processes and investigations. May also include mechanism to *facilitate a better working environment*, such as conducting staff surveys, providing senior management information about other employees, and conducting training.
- To Monitor Work-Related Licenses and Credentials, including provisioning software licenses for use in the course of an employee's work related responsibilities, ensuring compliance, training, examination and other requirements are met with applicable regulatory bodies.
- To Provide Our Employees with Human Resources Management Services, including providing employee data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of employee claims, and travel administration.
- To Maintain Your Contact Information and/or Assist You in Case of Emergency, including altering your details across relevant entities within the SP Plus group of companies (for example personal, other employment and transferring roles) as well as maintenance of contact details for you, and your dependents in case of personal or business emergency.
- To Monitor Eligibility to Work in the U.S., which means monitoring and ensuring compliance of employees' ability to work in the U.S.
- To Conduct Healthcare-Related Services, including conducting pre-employment and employment-related medical screenings for return to work processes and medical case management needs; determining medical suitability for particular tasks; identifying health needs of employees to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on fitness for travel and fitness for expatriation.
- To Maintain Security on SP Plus Websites and Internet Connected Assets, which includes hosting and maintenance of computer systems and infrastructure; management of SP Plus's software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and Internet access.



## California Consumer Privacy Act: Applicants & Employees

### **We may obtain the categories of personal information listed above from the following categories of sources:**

- Directly from you or your agent. For example, from documents or forms that you may provide to us related to participating in SP Plus's health or retirement benefit programs or the job position for which you are applying.
- Indirectly from you or your agent. For example, from evaluating your performance in your job position or the job position for which you are applying.
- Directly and indirectly from your activity from your electronic activity on our Site ([www.spplus.com](http://www.spplus.com)), on our network or your use of an online application or business system provided by SP Plus. For example, browsing history when you visit a website while on SP Plus's network or use SP Plus email.
- From third party Service Providers that provide services to us in connection with our business operations. For example, employee drug testing program administrators, third party background check administrator or employment applicant contact information from our applicant tracking system provider.

**Retention and Privacy Policy Changes.** SP Plus will retain your information for as long as is necessary for the purposes set out in this Privacy Policy or to operate its business and comply with our legal obligations, resolve disputes, enforce our agreements, and our written policies, including without limitation our Employee Handbook. SP Plus may change its Privacy Policy from time to time, and in SP Plus's sole discretion. When we make changes, we will revise the "Last Updated Date" of this Privacy Policy and provide you with a copy. We may also issue separate addendums if SP Plus determines it will use that method. Any such addendum will be made available to each employee.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

**Coverage.** This notice covers the above employee information that you may have already provided to the Company as part of your application and/or employment. The notice also covers any future collection of information.

**For More Information.** If you have questions or concerns regarding this Privacy Policy or use of your information, please contact us at via e-mail at [benefits@spplus.com](mailto:benefits@spplus.com) or by mail at:

SP Plus Corporation  
RE: Human Resources  
200 East Randolph Street, Suite 7700  
Chicago, IL 60601