

**GALLAGHER & ASSOCIATES**  
**PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES AND JOB APPLICANTS**  
**Updated April 16, 2024**

Gallagher & Associates, LLC (“G&A”) is committed to protecting your privacy. The information that you provide to G&A (sometimes referred to as the “company,” “we”, “us” or “our”) is utilized in order for us to (among other things) consider you as an employee, retain you as an employee and to maintain employment records.

This Notice to California Employees and Job Applicants (“Notice”) applies to our offline and online data collection practices, including when you submit personal information for purposes of applying for and/or becoming a valued employee at G&A, and in the course of your employment with G&A, pursuant to California law, including the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”).

This Notice is intended to inform California employees and job applicants of how G&A collects and uses their personal information and how the personal information they choose to provide to G&A will be protected under the CCPA and CPRA. If you are not an employee or job applicant who is a California resident, this Notice does not apply to you. While this Notice only applies to California employees and job applicants, this Notice is not an indication that G&A enforces different privacy policies for non-California employees or job applicants. G&A uses consistent offline and online data collection practices for both California and non-California employees and job applicants, including with respect to collecting, disclosing, selling and sharing personal information of G&A employees and job applicants.

Please note that if you are visiting our website or locations in a personal capacity, any of your personal information collected in a non-employment capacity is subject to G&A’s Privacy Policy for consumers and applicable consumer rights. For more information, we encourage you to visit and review our Privacy Policy and California Consumer Notice at <https://gallagherdesign.com>

**Your Consent**

Please review this Notice periodically. You should read this entire Notice before submitting information, including personal information, to us in any form. Whenever you submit personal information to us, you consent to the collection, use, disclosure, transfer, and storage of that information in accordance with this Notice.

All personal information may be used for the purposes stated in this Notice. We may make full use of all information that is de-identified, aggregated, or otherwise not in personally identifiable form.

**PERSONAL INFORMATION COLLECTED, SOLD OR SHARED**

**Information Collected**

We collect personal information from you when you choose to voluntarily provide it for purposes of employment with G&A or applying for employment with G&A.

## **Personal Information**

G&A collects Personal Information, such as your personal email address, name, mailing address, social security number, telephone number, bank information, and your designated emergency contact information based on your onboarding for employment purposes, and to communicate with you about employment processes and employment-related issues, to ensure compliance with internal HR policies and to facilitate the employment relationship including for processing of payroll and benefits (including family health benefits), and other internal business needs. To see a complete list of what we collect and how we use this data, please see Annex 1 below.

## **Internet/Network/Technology Activity**

If you are an employee, we collect information about you through your browser, computer hardware, and software. This information can include your IP address, device ID, browser type, domain names, access times and dates, number of clicks, pages viewed, one or more cookies (as described below) that may uniquely identify your browser, and referring website addresses. To see a complete list of what we collect and how we use this data, please see Annex 1 below.

## **Sensitive Personal Information**

We collect Sensitive Personal Information from you including information relating to your health, disability status, veteran status, caregiving status, expanded categories for race/ethnicity, voluntarily disclosed EEO data (e.g., gender identity, race), social security numbers, driver's license, passport or other identification information, immigration and citizenship status, certain biometric information, including photographs and video on G&A's properties, and other information or other data you choose to provide in connection with your application or employment. Access to your Sensitive Personal Information is strictly limited to those with a legitimate business reason for accessing this in line with the lawful basis described in Annex 1 below.

## **Information Sold or Shared**

We do not sell or share personal information about California employees or job applicants and have not sold or shared personal information in the past 12 months.

## **Information Disclosed For A Business Purpose**

We have disclosed the following categories of personal information about California employees and job applicants for a business or commercial purpose in the preceding 12 months, including:

- Personal identifiers;
- Sensitive personal information; and
- Internet/network/technology activity.

For details regarding the categories of third parties with whom we have or disclosed personal information, please see Annex 1 below.

## **HOW WE USE YOUR EMPLOYEE PERSONAL INFORMATION**

We use Personal Information of employees and job applicants for a wide range of purposes, including:

- to evaluate job candidacy and communicate with you regarding your application;
- to keep you up-to-date about the employment process and employment-related issues;
- to ensure compliance with internal HR policies;
- to facilitate the employment relationship, including for processing of payroll and benefits (including family health benefits), and other internal business needs;
- to maintain internal employment records;
- to maintain internal financial records including paystubs and payment methods;
- to meet and monitor government reporting regulations;
- to comply with legal obligations or to assert or defend legal rights or address legal claims and proceedings; and
- to maintain any other business operations.

## **HOW WE DISCLOSE YOUR EMPLOYEE PERSONAL INFORMATION**

### **Service Providers and Contractors**

We disclose Personal Information you provide to consultants, service providers, and contractors that we use to facilitate your employment and who support our business and operations who have agreed to keep the information confidential and use it only to provide the applicable service(s) such as vendors that help us communicate with you, administer payroll and benefits, host our website and data, and provide security and fraud detection.

### **Legal Obligations**

We may disclose Personal Information to outside parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our (or others') rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations.

### **Sale or Corporate Restructuring**

We may disclose Personal Information to third parties in connection the sale, assignment, merger, reorganization or other transfer of our brand or company.

To see a complete list of what we collect and how we use and disclose this information, please see Annex below.

## **RIGHTS UNDER THE CCPA AND CPRA**

Under California law, as an employee or job applicant, you are afforded several rights about the personal information collected about you, and you can make certain requests with regard to those rights as follows:

### **Right to Know about the Categories of Personal Information Collected or Disclosed (“Right to Know”)**

### **Right to Request Deletion of Personal Information (“Right to Delete”)**

### **Right to Correct or Rectify Inaccurate Information About You (“Right to Correct”)**

However, there are several exceptions that may apply. These exceptions to the right to request to access, correct, amend, and/or delete your personal information may include our right to maintain personal information of employees and applicants for business purposes and solely internal uses reasonably aligned with the expectations of the employee, as well as to comply with any legal obligations, including maintaining proper employee records, or maintaining privilege or confidentiality of certain records, in compliance with applicable U.S. and California labor laws and legal rights.

## **HOW TO MAKE YOUR REQUESTS TO KNOW, DELETE, OR CORRECT.**

You have the right to make requests for the aforementioned rights (Request to Know; Request to Delete; or a Request to Correct (a “Request”)).

To make a Request for any of the information set forth above, please submit a verifiable employee or job applicant request pursuant to the instructions below. The Request must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold, shared, or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your Request. If we cannot verify your identity, we will not be able to respond to your Request. We will acknowledge your Request within 10 business days and we will attempt to respond substantively within 45-90 days.

You can make a Request in the following ways:

- You may make a request here: [hr@gallagherdesign.com](mailto:hr@gallagherdesign.com) or with our HR Contact [ndvoskin@gallagherdesign.com](mailto:ndvoskin@gallagherdesign.com)
- You may call us at 212-951-0800

Once we receive your Request, we will begin the process to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records.

We will review all information provided by you to us, to determine whether we can respond to

your Request. We will inform you of our decision to deny or grant your Request.

For any Requests to Know, you may make such Requests twice within a 12-month period.

For Requests to Correct, you will need to provide evidence supporting the inaccuracy of the current information, and we reserve the right to delete the information instead of correcting if such deletion does not impact you or you consent to the deletion.

We will retain correspondence, documents and information related to any Request for 24 months as required by law.

### **ADDITIONAL CPRA RIGHTS**

The following additional rights are afforded to you under the CPRA:

#### **Right to Know Sensitive Personal Information Collected**

We collect and use your Sensitive Personal Information as described in Annex 1 below.

We do not collect or process sensitive personal information for the purpose of inferring characteristics or for any purposes other than those set forth in Regulations Section 7027(m).

#### **Right to Opt Out of Sharing and Selling**

We do not sell or share your Personal Information as defined under the CPRA. For more information about our collection practices, please see Annex 1 below.

#### **Right to Non-Discrimination for Exercising Consumer Privacy Rights**

You have the right not to receive discriminatory treatment for exercising your privacy rights conferred by the California Consumer Privacy Act, including by exercising the rights specified herein.

### **RETENTION OF PERSONAL INFORMATION**

We will retain your Personal Information for as long as it is necessary for the purposes set out in Annex 1 (below) and to the extent necessary to comply with our legal obligations (for example, if we are required to retain your Personal Information to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

### **AUTHORIZED AGENT INFORMATION**

You may designate an authorized agent to make a request on your behalf under the California Consumer Privacy Act.

In order to allow an authorized agent to make a request on your behalf, please email us at the following email address: [hr@gallagherdesign.com](mailto:hr@gallagherdesign.com) or call us at 212-951-0800 and provide your written request and consent to an authorized agent.

When your authorized agent makes a request related to your personal information, we will require the agent to provide the above written permission. We may also require that you verify your own identity directly with us at the time such a request is made.

### **Changes to This Employee Notice**

This Employee Notice may be revised from time to time for any reason. If this Employee Notice changes, the revised Notice will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Notice whenever you submit personal information to us.

### **GOVERNING LAW**

This Notice along with our privacy practices will be subject exclusively to the laws of the State of New York, United States of America. We make no representation that this Notice and its practices comply with the laws of other jurisdictions.

### **CONTACT FOR MORE INFORMATION**

For information and questions about the use of your personal information or this Employee Notice or your rights under California law, you may contact Human Resources at [ndvoskin@gallagherdesign.com](mailto:ndvoskin@gallagherdesign.com) or call us at 212-951-0800.

**ANNEX 1**  
**Notice of Collection, Use, and Disclosure**

Category	Examples	Collected From	Purposes	Disclosed to	Sold or Shared	Retention Period
Personal Identifiers	Name, signature, mailing address, telephone number, email address, date of birth, and financial information including bank account and routing number.	<p>You when apply for an employee position and when you join our company as an employee.</p> <p>We may also collect information from other party sources, such as service providers, publicly available data, and other companies and referrals.</p>	<p>To evaluate job candidacy, and to communicate with you regarding your application;</p> <p>To keep you up-to-date about the employment process and employment-related issues;</p> <p>Upon hiring about the employment process and employment-related issues, to ensure compliance with internal HR policies;</p> <p>To provide you with benefits, such as health, safety, compensation, family leave, and other kinds of employment benefits;</p> <p>To maintain internal business employment records;</p> <p>To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the</p>	<p>Consultants, service providers, and contractors that we use to support our business and operations (e.g., processing payments to employees, providing fraud detection services, managing and tracking job applications) who have agreed to keep the information confidential and use it only to provide the applicable services;</p> <p>Other parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests; and</p> <p>An acquirer or successor-in-interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment,</p>	N	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.



			<p>security of your account;</p> <p>To maintain internal financial records including processing of payroll and benefits (including family health benefits);</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies; and</p> <p>To maintain any other business operations.</p>	<p>transfer or other disposition of all or any part of the business or its affiliates including any negotiation thereof.</p>		
Sensitive Personal Information	<p>Personal identification numbers, including social security, driver's license, passport, or state ID card numbers; consumer's geolocation; immigration and</p>	<p>You when apply for an employee position and when you join our company as an employee.</p> <p>We may also collect information from other party sources, such as service providers, publicly available data, and other companies and referrals.</p>	<p>To evaluate job candidacy, and to communicate with you regarding your application;</p> <p>Upon hiring about the employment process and employment-related issues, to ensure compliance with internal HR policies;</p>	<p>Consultants, service providers, and contractors that we use to support our business and operations (e.g. processing payments to employees, and providing fraud detection services) who have agreed to keep the information confidential and use it only to provide the applicable services;</p>	N	<p>We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.</p>

	<p>citizenship status;  consumer's racial origin,  religious beliefs,</p>		<p>To maintain internal business employment records;</p> <p>To provide you with benefits, such as health, safety, compensation, family leave, and other kinds of employment benefits;</p> <p>To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account;</p> <p>To maintain internal financial records including processing of payroll and benefits (including family health benefits);</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies; and</p>	<p>Other parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests; and</p> <p>An acquirer or successor-in-interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment, transfer or other disposition of all or any part of G&amp;A or its affiliates including any negotiation thereof.</p>		
--	---	--	---	---	--	--

			To maintain any other business operations.			
<b>Internet/ Network/ Technology Activity</b>	IP addresses; audio and video monitoring, device information, webpages visited, time spent on webpages, links clicked, and location information.	Work-provided computers, mobile devices, tablets, and cell phones and video monitoring at all locations.	To maintain internal business employment records;  To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.	Other parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests.	N	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

