

Privacy Policy for California Residents

Effective Date: June 30, 2023

Last Reviewed on: June 30, 2023

This **Privacy Policy for California Residents** supplements the information contained in ODW Logistics' [General Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended (CCPA), and any terms defined in the CCPA have the same meaning when used in this Policy.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have **collected** the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
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 in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical	YES

characteristics under California or federal law.	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).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. 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.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
Bank Account Information	Financial account, debit card, or credit card number	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the above categories of personal information from the following categories of sources:

- Directly from you. For example, from forms you complete, or records prepared based on information you have provided to us.
- From others whom you instruct to interact with us on your behalf.
- Indirectly from you. For example, from observing your actions whether on our Website or inside our warehouses.
- Data Analytics Aggregators
- Human Resources Service Providers

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

- **Recruitment, Onboarding, Payroll, and Human Resources Management.** For example, processing employment applications, verifying eligibility, managing payroll, administering benefits, and maintaining personnel records.
- **Legal Compliance, Policy Enforcement, and Governance.** For example, ensuring compliance with labor laws, conducting internal audits, responding to legal and law enforcement requests, and enforcing company policies.
- **Security, Safety, and Asset Protection.** For example, implementing measures to ensure the safety of employees, customers, and assets, and preventing unauthorized access to company property and data.
- **Operational Efficiency, Logistics, and Employee Productivity.** For example, optimizing logistics and supply chain, enhancing employee productivity, and monitoring adherence to company standards.
- **Diversity, Inclusion, and Workforce Analytics.** For example, promoting diversity and inclusion within the company and utilizing data analytics for workforce assessments.
- **Information Systems Management and Integrity.** For example, securing and streamlining company information systems, and maintaining the safety, security, and integrity of technology assets and databases.
- **Customer Engagement, Support, and Transaction Processing.** For example, fulfilling customer requests, processing transactions, providing support, and responding to inquiries.
- **Website, Product, Service Development, and Personalization.** For example, developing, supporting, and personalizing the website, products, and services, including research, analysis, and improvement.
- **Marketing and Targeted Content Delivery.** For example, delivering content, targeted offers, and ads relevant to users' interests through various channels.
- **Business Transitions and Evaluations.** For example, evaluating or conducting mergers, divestitures, or other business transitions where personal information is among the transferred assets.

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.

We will keep the personal information we collect only for as long as necessary to carry out the purpose for which it was collected or as required under applicable law. We dispose of the information we collect in accordance with our retention policies and procedures.

Employees and applicants may visit our Employee and Applicant Notice at Collection to read more about how we collect and use personal information for human resources, employment, benefits administration, health and safety, and business-related purposes.

Selling and Sharing Personal Information

We do not sell personal information, as that term is defined by the CCPA. Nor do we have actual knowledge of selling or sharing the personal information of consumers under 16 years of age.

In the preceding twelve (12) months, we have shared personal information for a business or commercial purpose, as that term is defined by the CCPA.

Personal Information Category	Categories of Third-Party Recipients to Whom Personal Information Was Disclosed
A: Identifiers.	Advertising and Analytics Service Providers. For example, sharing user activity and IP addresses with Google to enable cross-context behavioral advertising and to analyze website traffic and user interactions.
F. Internet or other similar network activity.	Advertising and Analytics Service Providers. For example, sharing user activity and IP addresses with Google to enable cross-context behavioral advertising and to analyze website traffic and user interactions.

We may share this personal information for one or more of the following business or commercial purposes:

- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).

Disclosing Personal Information

We may otherwise disclose your personal information to a third-party for a business purpose. We only make these disclosures for a business purpose and pursuant to written contracts that describe such purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

Personal Information Category	Categories of Third-Party Recipients to Whom Personal Information Was Disclosed
A: Identifiers.	<p>Payroll and Timekeeping Services. For example, entities that specialize in calculating and distributing employee wages and salaries, as well as tracking the hours worked by employees.</p> <p>Employee Benefits and Insurance Providers. For example, companies that offer health and wellness benefits, as well as those providing liability and health insurance policies for employees.</p> <p>Financial and Legal Services. For example, banks and other financial institutions that handle monetary transactions, and legal firms or CPAs that provide external legal and accounting services.</p> <p>Background and Compliance Check Services. For example, service providers that conduct criminal background checks, drug testing, safety audits, and manage workers' compensation claims to ensure workforce compliance.</p> <p>Government Authorities and Regulatory Compliance. For example, federal, state, and local government agencies responsible for the oversight and enforcement of laws, especially pertaining to taxes and legal disclosures</p> <p>Customer Relationship Management (CRM) Vendors. For example, companies that provide software and services for managing and analyzing customer interactions and data throughout the customer lifecycle.</p>
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>Payroll and Timekeeping Services. For example, entities that specialize in calculating and distributing employee wages and salaries, as well as tracking the hours worked by employees.</p> <p>Employee Benefits and Insurance Providers. For example, companies that offer health and wellness benefits, as well</p>

	<p>as those providing liability and health insurance policies for employees.</p> <p>Financial and Legal Services. For example, banks and other financial institutions that handle monetary transactions, and legal firms or CPAs that provide external legal and accounting services.</p> <p>Background and Compliance Check Services. For example, service providers that conduct criminal background checks, drug testing, safety audits, and manage workers' compensation claims to ensure workforce compliance.</p> <p>Government Authorities and Regulatory Compliance. For example, federal, state, and local government agencies responsible for the oversight and enforcement of laws, especially pertaining to taxes and legal disclosures.</p> <p>Customer Relationship Management (CRM) Vendors. For example, companies that provide software and services for managing and analyzing customer interactions and data throughout the customer lifecycle.</p>
<p>C. Protected classification characteristics under California or federal law.</p>	<p>Employee Benefits and Insurance Providers. For example, companies that offer various employee benefits and insurance coverages, including health and liability insurance policies.</p> <p>Background Checks and Screening Services. For example, entities that specialize in conducting criminal background checks and drug screenings for pre-employment or compliance purposes.</p> <p>Workers Compensation and Claims Management Providers. For example, third-party organizations that handle and manage workers' compensation claims, ensuring proper assistance and support for work-related injuries or illnesses.</p> <p>Government Authorities. For example, federal, state, and local governmental authorities that oversee taxes,</p>

	withholdings, and other mandatory disclosures as required by law.
F. Internet or other similar network activity.	<p>Third-Party IT Consultants. For example, external experts or companies specializing in information technology that provide services such as system implementation, support, or advisory.</p> <p>Legal and Financial Advisory Services. For example, law firms and certified public accounting (CPA) firms that offer legal advice, representation, and financial auditing or consulting services.</p> <p>Insurance Providers. For example, companies that offer liability insurance policies to protect against claims resulting from injuries or damage to property.</p>
G. Geolocation data.	<p>Third-Party IT Consultants. For example, external experts or companies specializing in information technology that provide services such as system implementation, support, or advisory.</p>
I. Professional or employment-related information.	<p>Employee Benefits and Insurance Providers. For example, companies offering various employee benefits, including health and liability insurance policies.</p> <p>Background Checks, Drug Screening, and Safety Services. For example, service providers specializing in criminal background checks, drug screenings, and safety audits to ensure employee compliance and workplace safety.</p> <p>Workers Compensation and Claims Management Providers. For example, third-party organizations focused on managing workers' compensation claims and ensuring proper support for work-related injuries or illnesses.</p> <p>Government Authorities. For example, federal, state, and local government agencies responsible for taxes, withholdings, and other legal disclosures.</p>

	Legal and Financial Advisory Services. For example, external law firms and certified public accounting (CPA) firms that provide legal representation, advice, and financial consulting or auditing services
Bank Account Information.	<p>Payroll Services Providers. For example, companies specializing in managing and processing employee wages, salaries, and other payroll-related activities.</p> <p>Financial Institutions. For example, banks, credit unions, and other entities that provide financial services including savings, loans, and financial transactions.</p>

We may disclose the personal information we collect for one or more of the following business or commercial purposes:

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We have neither used nor disclosed sensitive personal information other than as allowed under the California Consumer Privacy Act.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The categories of personal information that we shared in the preceding 12 months, and for each category identified, the categories of third parties to whom we shared that particular category of personal information
- The categories of personal information that we disclosed for a business purpose in the preceding 12 months, and for each category identified, the categories of third parties to whom we disclosed that particular category of personal information
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete below), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request by either:

- Calling us at 614-681-8523
- Emailing us at info@odwlogistics.com

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please email us at info@odwlogistics.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is should reasonably allow you to transmit the information from one entity to another entity.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Right to Opt-Out of Sharing Personal Information

You have the right to opt-out of the sharing of your personal information for cross-context behavioral advertising. You can request that we stop sharing your personal information by emailing as at info@odwlogistics.com or calling 614-681-8523.

We will also honor certain technologies broadcasting an Opt-Out Preference Signal such as the Global Privacy Control ("GPC"). This occurs on the browsers and/or browser extensions that support such a signal. This request will be linked to your browser identifier only and will not tie to your individual identity.

We will process your opt-out preference signal in a frictionless manner. This means that (1) we will not charge a fee or require any additional consideration if you use an opt-out signal, (2) your experience with our services will not change after processing of the opt-out signal, and (3) no additional notifications, pop-ups, text, or graphics will appear in response to the opt-out signal.

Some browsers include a "Do Not Track" (DNT) setting that can send a signal to the websites you visit indicating you do not wish to be tracked. Unlike the GPC described above, there is not a generally accepted

understanding of how to interpret DNT signals. As such, we do not respond to browser DNT signals. Instead, you can email us or use the GPC as described above.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 614-681-8523

Email: info@odwlogistics.com