

# HR Privacy Notice at Collection

*Last updated: January 1, 2023*

**Ferguson Enterprises, LLC** and our subsidiaries and affiliates (collectively, "**Ferguson**" or "**We**") respect your concerns about privacy. This HR Privacy Notice describes the types of information we collect about individuals who are (1) Ferguson associates, directors, officers, and contractors (collectively, "**Associates**" or "**You**"), (2) dependents and emergency contacts of Associates, and (3) individuals related to Associates for whom Ferguson administers benefits (collectively, with Associates, dependents, and emergency contacts of Associates, ("**HR Covered Individuals**").

Associates are responsible for providing this Privacy Notice to any HR Covered Individual whose information is provided to Ferguson by an Associate. For more information on Ferguson's policies, please refer to [Ferguson's Privacy Policy](#).

## Where We Get Your Information.

We may collect information about HR Covered Individuals from the following sources: 1) You; 2) prior employers, references, recruiters, educational institutions, credentialing and licensing organizations, job-related social media platforms; 3) third-party sources of demographic information; 4) third-party companies, such as pre-employment screening and background check companies, drug testing facilities; 5) benefit and claim administrators and investigators; 6) electronic devices; and 7) other sources as directed by You.

## The Personal and Sensitive Personal Information That We Collect.

To carry out company activities and obligations as an employer, we may collect the following categories of information about HR Covered Individuals:

- **Identifiers**, such as name, alias and other names, personal email address, telephone or mobile phone number, home address, Social Security Number, driver's license number or state ID card number, passport number, federal identification authorizing work in the United States, photographs for identification purposes, signature, and other unique personal identifiers associated with HR Covered Individuals.
- **Educational and Professional Information**, such as a resume or CV, cover letter, employment and education history, professional memberships and licenses, reference information, transcripts or information provided on a job application.
- **Employment-Related Information**, such as marital or domestic partner status, date of birth, age, gender, classifications protected under state or federal Equal Employment Opportunity laws (such as race or national origin), terms relating to compensation and benefits packages, willingness to relocate, beneficiary and dependent information, emergency contact information, wage and benefit information, performance information, start date and job title, location of employment, information received from background checks (where applicable), including information provided by third-parties, DMV records and driving related information, information related to any assessment you may have

taken as part of the interview screening process, or other personal details included in a resume or cover letter or that you otherwise voluntarily provide to us.

- **Medical and Wellness Information**, such as medical condition or other information, health insurance enrollment information and policy number, any other information you or your doctor provide to us related to a medical condition, and wellness information (see [Notice Regarding Wellness Program](#)).
- **Internet, Account or Network Activity Information**, such as username and password, account name or number, IP address, other online or device identifiers (operating system, browser used, etc.), or other electronic network activity information such as browsing history, search history, and interactions with applications, websites, and Company online systems, timeclock time and attendance information, and any personal information that you provide while accessing or using Ferguson's computer or computer systems;
- **Geolocation data**, such as time and physical location related to use of an application, device, Ferguson vehicles, physical or badge access to a Ferguson office location, as well as telematics data for Ferguson vehicles.
- **Biometric information**, such as fingerprint, or voice recordings and keystroke patterns or rhythms, gait patterns or rhythms, and other characteristics that can be used to establish identity.
- **Financial Information**, such as bank account and payroll information, billing address, and information about your income and account balances.
- **Sensory or surveillance information**, such as call monitoring, and video surveillance, your entry, exit and actions in or around our facilities that may be monitored, audio and visual information that we may obtain if you use video interviewing as part of the application process, and in-cab cameras in Ferguson delivery vehicles.

Ferguson reserves the right to collect or not collect the personal information and sensitive personal information about an HR Covered Individual within each of these categories for Ferguson's business purposes.

### **How Your Personal and Sensitive Personal Information is Used.**

We may use personal information and sensitive personal information of HR Covered Individuals for the purpose of carrying out and supporting HR functions and activities, including the following:

- **Human Resources Management.** Personal information and sensitive personal information are used in order to manage work activities and Associates generally. This includes recruiting, performing background and reference checks, providing references, compensation planning, succession planning, reorganization needs, performance assessment, training, managing attendance, absences, leaves of absence and vacations, administering payroll services, reimbursing expenses, associate benefit administration, making travel arrangements, securing immigration statuses, monitoring staff, investigating suspected misconduct or non-performance of duties, managing disciplinary matters, grievances and terminations, reviewing staffing decisions, providing access to facilities, compliance with applicable legal requirements, and communication with Associates and/or their representatives.
- **Business Processes and Management.** Personal information and sensitive personal information are used to operate, manage, and maintain our business operations including,

for example, scheduling work assignments, managing Ferguson assets, reporting/releasing public data (e.g., Annual Reports, etc.), and populating associate directories. Information may also be used to comply with government regulations.

- **Safety and Security Management.** Personal information and sensitive personal information are used as appropriate to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems, preventing malicious software distribution, and to ensure the safety and protection of Associates, assets, resources, and communities, including protecting Ferguson against illegal activity and other misconduct by protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- **Communication, Identification, and Legal Obligations.** Personal information and sensitive personal information are used to identify you, to communicate with you, and to fulfill our legal obligations, including those related to tax and anti-discrimination laws.
- **Complying With the Law, Legal Process, and Internal Policies.** Personal information and sensitive personal information are used to comply with the law, legal process, and internal policies such as maintaining records, claims processing, internal audits, responding to legal requests for information and subpoenas, and exercising and defending legal claims.
- **Other Business Purposes.**

Ferguson reserves the right to use or not to use the personal information and sensitive personal information about an HR Covered Individual for each of the above purposes.

#### **Disclosure of Personal and Sensitive Personal Information.**

We may disclose the personal information and sensitive personal information of HR Covered Individuals for the purposes described above to the following categories of entities or under the following circumstances:

- to affiliates and subsidiaries;
- to service providers;
- to professional advisors;
- to regulatory and government agencies;
- legal requests and investigations;
- business transfers / acquisitions;
- protection of Ferguson and others;
- where the personal information is publicly available; and
- for additional purposes with your consent where such consent is required by law.

#### **Retention of Personal Information.**

We retain the information We receive about HR Covered Individuals for Ferguson's business purposes in accordance with Ferguson's [Records Retention Policy and Schedule](#) (see Appendix A) unless a shorter or longer period is required by state or federal law.

## **California HR Covered Individuals.**

The California Consumer Privacy Act (“CCPA”) as amended by the California Privacy Rights Act (“CPRA”) provides California HR Covered Individuals with certain rights where applicable:

- Knowledge of personal information collected;
- Deletion of personal information collected;
- Correction of personal information collected; and
- Not to be discriminated or retaliated against for exercising rights under the law.

Ferguson does not sell or otherwise disclose California HR Covered Individuals' personal information for monetary or other consideration to any third parties. Ferguson does not share California HR Covered Individuals' personal information to third parties for cross-context behavioral advertising.

## **For Inquiries and/or to Submit Requests for Information, Deletion or Correction.**

To exercise any of these rights, please complete and submit the [Data Subject Access Request \(DSARs\) Form](#) or call (833) 865-0355.

## **How to Contact Us.**

We may change this policy from time to time. If you have any questions about this HR Privacy Notice or the ways in which Ferguson collects and uses your personal information, please visit the [HR Portal](#) where you can find more information or [submit a question to HR](#).