

Privacy Notice for California Employees and Employee Candidates

Effective Date: January 1, 2023

Last Reviewed On: April 11, 2025

1. **Purpose:** Gleiberman Properties, Inc. (dba “MG Properties”) has adopted this policy to define requirements for the treatment of MG Properties’ employees’ personal information, specifically how MG Properties may collect and use information about our employees and employee candidates in California. This notice is also adopted to comply with the data privacy laws in California.
2. **Policy:** As a MG Properties employee or employee candidate, this policy applies to you if you reside in California (“you”). This policy, as outlined below, may be modified from time to time without prior notice. Where MG Properties collects additional categories of personal information or uses the personal information we collected for materially different, unrelated, or incompatible purposes, MG Properties will provide you with notice, including posting the updated notice on SharePoint or HRIS system and update the notice’s effective date.
3. **Policy and Procedures Review:** The policy and related procedures will be reviewed every 12 months or as necessary.
4. **Personal Information:** MG Properties collects and maintains different types of personal information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you (“**personal information**”) and is about its employees and employee candidates in accordance with applicable law.
5. **Collection and Sharing of Personal Information:** For its employees and employee candidates, MG Properties has collected the following categories of personal information within the last twelve (12) months:

Category	Examples	Purpose	Third Parties Shared
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.	(a) Performance of an employment activities, including conducting payroll or providing other benefits. (b) Necessary for our legitimate business interests, including to recruit and hire candidates (c) Necessary to comply with a legal obligation, for example, drug testing.	(a) Human resources information service providers (b) Financial investment service providers (c) Insurance providers (d) Payroll service providers (e) Physical security vendors

Category	Examples	Purpose	Third Parties Shared
California Customer Records Law	A name, signature, Social Security number, contact information, insurance policy number, education, employment history, financial information, medical information and health information.	(a) Performance of an employment activities, including conducting payroll or providing other benefits. (b) Necessary for our legitimate business interests, including to recruit and hire candidates. (c) Necessary to comply with a legal obligation, for example, drug testing.	(a) Human resources information service providers (b) Financial investment service providers (c) Insurance providers (d) Payroll service providers (e) Physical security vendors
Protected classification characteristics	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex, sexual orientation, veteran or military status, genetic information.	(a) Necessary for our legitimate business interests. (b) Necessary to comply with a legal obligation, including mandatory reporting requirements.	(a) Human resources information service providers (b) Financial investment service providers (c) Insurance providers (d) Payroll service providers (e) Physical security vendors
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation	(a) Analytics and business intelligence vendors (b) Security vendors
Geolocation data	Precise geolocation through IP address (device location).	(a) Necessary for our legitimate interests, including to be able to verify location and	(a) Payroll service vendors (b) Physical security service vendors

Category	Examples	Purpose	Third Parties Shared
		identity of employees for payroll purposes.	
Professional or employment-related information.	Current or past job history or performance evaluations.	(a) Necessary for our legitimate business interests, including to verify task training and obtain policy consent and recruit and hire candidates.	(a) Human resources information service providers
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.	(a) Necessary for our legitimate business interests, including to verify task training and obtain policy consent and recruit and hire candidates.	(a) Human resources information service providers
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	(a) Necessary for our legitimate business interests, including to recruit and hire candidates and determine and assess tendencies and performance.	(a) Talent assessment service providers
Sensitive personal information	Personal information that reveals government IDs; precise geolocation; racial or ethnic origin; personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation, including mandatory reporting requirements.	(a) Human resources information service providers (b) Financial investment service providers (c) Payroll service vendors (c) Government entities or regulators

6. **Additional Uses of Personal Information.** In addition to the uses described above, MG Properties may also use your personal information for the following purposes:

- a. To investigate and help prevent fraud or otherwise ensure compliance with policies and procedures.
- b. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- c. To help maintain the safety, security, and integrity of our systems, services, databases and other assets.
- d. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- e. As described to you when collecting your personal information.
- f. To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of MG Properties' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by MG Properties about our employees or employee candidates is among the assets transferred.

Additionally, MG Properties obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or by communicating with us by post, phone, email or otherwise.
 - Indirectly from you. For example, from observing your actions on our computer systems or other platforms.
 - Third parties. For example, from vendors we use for background checks.
7. **Disclosure of Personal Information:** MG Properties may share your personal information for business purposes by disclosing it to the categories of third parties identified in the chart above. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.
 - a. **We do not sell or share (for cross-context behavioral advertising) your personal information.**
 - b. **We also do not disclose or use sensitive personal information outside of the permissible uses identified within the CCPA.**
 8. **Retention Periods:** MG Properties will generally retain information about you for so long as we have a legal or business purpose for it or a legal requirement to maintain it. The criteria used to determine our retention periods include:
 - a. the length of time we have an ongoing relationship with you (for example, for as long as you are working at MG Properties or a prospective employee) and the length of time thereafter during which we may have a legitimate need to reference your personal information to address issues that may arise;

- b. whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records for a certain period of time before we can delete them); or
 - c. whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).
- 9. **Your Rights and Choices:** You may have rights regarding your personal information. This section describes the rights you may have and explains how to exercise those rights.
 - a. **Access to Specific Information:** You may have the right to request that MG Properties disclose certain information to you about our collection and use of your personal information over the past 12 months, including:
 - i. The categories of personal information we collected about you.
 - ii. The categories of sources for the personal information we collected about you.
 - iii. Our business or commercial purpose for collecting that personal information.
 - iv. The categories of third parties with whom we share that personal information.
 - v. The specific pieces of personal information we collected about you.
 - vi. If we disclosed your personal information for a business purpose, identification of the personal information categories that each category of recipient obtained.
 - b. **Deletion Request Rights:** You may have the right to request that MG Properties delete any of your personal information that we collected from you and retained, subject to certain exceptions. If an exception applies, we will advise you of the applicable exception and the reason for denying your request.
 - c. **Correction Request Rights:** You may have the right to request that MG Properties correct any inaccurate personal information we may hold about you. We will use commercially reasonable efforts to correct inaccurate personal information, taking into the account the nature of the personal information and the purpose for our processing.
 - d. **Non-Discrimination:** We will not discriminate against you for exercising any of your rights.
- 10. **Exercising Your Rights:** To exercise your rights described above, please submit a request by either:
 - a. Sending us an email at humanresources@mgproperties.com.
 - b. Calling us at 858-366-6508.

We may need to validate your request. In order to validate your request, we may ask you for the following information: full name, dates of employment, department or property of employment. Only you or an authorized agent may make a request related to your personal information. To designate an authorized agent to make a request on your behalf,

please provide us with a power of attorney or other legally binding written document signed by you and identifying your agent. We may also verify the identity of your designated agent.

11. **Questions About This Notice:** If you have any questions or comments about this notice or the ways in which MG Properties collects and uses your information, please contact:

Idalith Santiago, VP Human Resources

humanresources@mgproperties.com