



California Privacy Policy

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For the most recent revision, refer to the Document Library.

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History of Revisions

Revision	Issue Date	Action	Description
0	04/24/2026	New document.	Initial issue.



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ACRONYMS

CPRA Consumer Privacy Act

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1. PURPOSE / SCOPE

This Privacy Policy ("Privacy Policy" or "Policy") applies solely to individuals that reside in the State of California who are employees and job applicants of North Wind Group and its wholly owned subsidiaries ("Company", "we" or "us"). We adopt this Policy to comply with the California Consumer Privacy Act of 2018 and any subsequent amendments, including the California Consumer Privacy Act ("CPRA"). Any terms defined in the CPRA have the same meaning when used in this Policy.

2. COLLECTION AND USE OF PERSONAL INFORMATION

We may collect and use the following categories of personal and sensitive personal information about you when you inquire about and/or apply for employment at the Company. Except as noted below, this information is generally collected directly from you:

Categories of Personal Information	Purpose for Collecting/How we use it
Contact information: such as your name, home and work address, personal and work telephone numbers, personal and work email addresses.	We will use this information to open and maintain candidate records and communicate with you for regarding your interest in a job opportunity with us, your application for employment, or updates on your candidacy.
Job-related information and qualifications: such as position applied for, employment history, including previous job roles, education history, awards, qualifications, certificates, licenses, and any other information you choose to provide in your resume, interview(s) and/or application(s).	We will use this information to assess your suitability for a position at the Company.
Documents required on the I-9 form to establish your right to work in the United States, such as copies of you driver's licenses or passport.	We will use this information to determine your eligibility to work and fulfill our obligations to relevant government authorities.
To the extent you travel in connection with the application process, travel-related records, such as frequent flyer numbers, itineraries, flight, train, rental car, car service, hotel or other similar information.	We will use this information to arrange or reimburse travel where you require travel to interview with us or in connection with your candidacy for employment, contact you during travel, as necessary with travel service providers, or in an emergency situation.
Information regarding your fitness for a particular position and ability to perform the essential functions of the job and potential conflicts of interests.	We will use this to determine your suitability for certain job roles and conflict of interest reporting.
Medical information to the extent you seek an accommodation during the application process based on a physical or mental impairment, which could be provided by you or your health care provider.	We use this information to determine our ability to accommodate you.
References: Such as opinions and comments of any previous employers.	We will use this to determine your suitability for certain job roles.



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Categories of Personal Information	Purpose for Collecting/How we use it
Equal opportunities monitoring information: such as your ethnicity, gender, disability, and veteran status. (Providing this information is voluntary and your decision to provide or withhold any of this information will not negatively impact your employment in compliance with applicable state and federal laws. If you decline to provide certain characteristics (e.g., race/ethnicity) about yourself, we may need to identify by reference to records or visual observation for compliance reporting purposes).	We will use this to conduct equal opportunity and diversity monitoring where permitted or required by law.
Internet activity such as user traffic patterns throughout the Site according to a user's domain name, browser type, date and time of access and pages viewed. Web servers collect the domain names and other technical information associated with visitors to the site.	This information is collected in order to measure the number of visitors to the Site and to determine which areas of the Site users find useful based upon the amount of traffic to particular areas.

We may collect additional personal and sensitive personal information if you become an employee of the Company. Except as noted below, this information is generally collected directly from you:

Categories of Personal Information	Purpose for Collecting/How We Use It
Identifying information such as social security number, gender identity, marital status and date of birth.	We use this to identify you, pay you and provide you with benefits and to complete required legal forms associated with hiring and other legal obligations.
Bank account information.	We use this to pay you by direct deposit if you choose this method of payment.
Name and contact information, including address, phone number and email address of your emergency contacts.	We use this to have a point of contact in case there is an emergency situation affecting you.
Log-in and other authentication information used on our systems.	We use this to validate your identity when accessing our facilities and systems.
The Company reserves the right to access, monitor and review internet activity and communications made on Company systems, including email and texts on phones used for work.	We reserve the right to use this information to comply with legal obligations and conduct workplace investigations as needed.
Medical information, including information needed to support requests for leave, absenteeism or in connection with workers' compensation, which could be provided by you or your health care provider.	We use this to determine eligibility for leave and workers compensation processing.

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2.1 How We Use Personal Information

Any personal information collected will be used to:

- enable us to administer and manage our workforce and relevant programs, including benefits programs
- undertake promotion and succession planning
- comply with any applicable legal and regulatory requirements involving Workers, which may include providing reports to government agencies
- verify your identity to ensure security for one of the other purposes listed in this policy
- maintain your Worker records
- ensure or enhance the security and functionality of our electronic systems
- protect against fraud
- conduct internal investigations and comply with our policy and legal obligations.

Personal information is used only in ways that are compatible with the purposes described in this policy. We will provide notice to you if your information will be used for other purposes.

We take commercially reasonable steps to ensure that the personal information we collect is relevant to its intended use and is accurate, up-to-date, and complete.

2.2 Sharing of Personal Information

Within our company and group of companies:

Because we have many different entities within the company group and operations in many different locations, we may transfer your information from one legal entity to another or from one location to another in order to accomplish purposes listed in this Policy. We will transfer your personal information in a manner that is consistent with applicable legal requirements.

With Third Parties:

We share your personal information with third parties, such as service and benefit providers, who we engage to help us:

- Provide compensation and benefits to employees;
- comply with legal obligations, including in response to a legitimate legal request from law enforcement authorities or other government regulators;
- maintain the security and integrity of our networks and systems;
- investigate suspected or actual illegal activity;
- prevent physical harm or financial loss; and
- support the sale or transfer of all or a portion of our business or assets (including through bankruptcy).

All of our service providers will use personal information only for the purposes identified in this policy and will provide services under a contract which restricts use of information to that which is necessary to perform services on our behalf or to comply with legal requirements.

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2.3 Rights With Respect to Your Personal Information

As a California resident, you have a right to inquire about the personal information we collect, use, and disclose about you and the right to access, correct, know and/or request deletion of such information, subject to certain limitations. Please see "Contact Us" section below for information on how to exercise such rights. To access or change your information, you can log into your profile and make any corrections or deletions required. If you have questions or concerns, contact us by emailing HR@northwindgrp.com.

3. NON-DISCRIMINATION

As a California resident, California law does not permit us to discriminate or retaliate against you because you exercised certain privacy rights under CPRA.

4. SAFEGUARDS

We have in place physical, electronic and procedural safeguards appropriate to the sensitivity of the information we maintain. Safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the personal information. They include physical, technical, and managerial measures to keep personal information protected from unauthorized access. However, due to the nature of the internet and related technology, we cannot absolutely guarantee the security of personal information, and we expressly disclaim any such obligation.

5. DATA RETENTION

We retain personal information as is reasonably necessary to fulfill the purposes described in this Policy. We retain your personal information as long as necessary during your engagement, during any transition period (e.g., for the provision of ongoing benefits) or to comply with applicable legal obligations and record retention requirements.

We determine how long to retain your personal information by reference to applicable law or regulation, court, administrative or arbitration proceedings, or audit requirements.

6. CHANGES TO THIS POLICY

As our company evolves, we expect to update this policy from time to time without prior notice. We encourage you to review this Policy on a regular basis for any changes.

7. DESIGNATING AN AUTHORIZED AGENT

California law permits California residents to designate an agent to manage their rights under California law. If qualify and you would like to designate an agent to manage your privacy preferences, you may do so using the mechanisms noted below under "Exercising California Privacy Rights." We will also need sufficient Personal Information about your authorized agent to be able to identify them. As part of this process, you must have permission from your authorized agent to disclose their Personal Information to us for the purpose of acting as your agent.



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8. EXERCISING CALIFORNIA PRIVACY RIGHTS

If you are a California resident and would like to exercise any of your rights you may do so by contacting us by using the contact particulars noted in the "Contact Us" section below.

9. CONTACT US

If you have any comments or questions, please email HR@northwindgrp.com or call us at 1-208-528-8718.

If you are a California resident and wish to exercise your rights under the CPRA, please email HR@northwindgrp.com or write to the address below. We will confirm receipt without delay and endeavor to substantively respond within 45 days of receipt of your request. If you do not receive a response from us within [45] days, please contact HR@northwindgrp.com. If we require more time, we will let you know how long we need and why.