

HAI Group’s Notice of Collection of Personal Information

The purpose of this ***Notice of Collection of Personal Information*** (“Notice”) is to inform our employees, applicants and independent contractors about HAI Group’s (“HAI”) collection of their personal information and sensitive information (as applicable), and the specific categories of information collected, as well as the purpose for which these categories of information will be used.

TYPES OF CATEGORIES OF PERSONAL INFORMATION COLLECTED

Specifically, we may collect the following types and categories of personal information from you:

Category	Data Elements
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.
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, content of electronic communication, or health insurance information. Some personal information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical 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).
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Geolocation data.	Physical location or movements.
Professional or employment-related information.	Current or past job history or performance evaluations.

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.
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Sensitive Personal Information	Race, Ethnicity, Government ID, Financial Account Login Information, Geolocation, Union Membership, Religious beliefs or affiliation

We will not collect any other types or categories of personal information other than as set forth in this Notice. If we intend to collect additional types or categories of personal information, we will provide you with a new notice at the time of collection.

HOW YOUR PERSONAL INFORMATION WILL BE USED

We will use the personal information collected from you for purposes of employment decisions, payroll and benefits administration, wellness programs, as well as, provision of health, dental and vision insurance.

Pursuant to applicable state law(s), we are required to notify you of any use or disclosure of your personal information for purposes other than those permitted uses and disclosures during the course of your employment, application for employment or providing contract services. Therefore, while we do not use or disclose your personal information for purposes other than those listed above, we are required to inform you that we do not sell any of your personal information or share your personal information for cross-context behavioral advertising.

If we use your information for any other purpose, other than as set forth in this Notice, we will notify you of such changes in our practices, and, as required by law, obtain express consent to use your information for the new purpose(s).

YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

As a resident of California, you have the following rights under the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”):

- to know what categories of Personal Information about you we have collected and used, including how the Personal Information was collected;
- to know what categories of Personal Information are being sold (if any) or disclosed, and if it is being sold or disclosed to third parties, and a list of categories of information that are sold;

- to opt out of the sale of your Personal Information, if applicable (see below);
- to access your Personal Information, including the right to download or transfer Personal Information collected during the previous 12 months;
- to request that your Personal Information be deleted;
- to equal service and equal price for goods or services even if you exercise your rights under the CCPA;
- to correct inaccurate Personal Information; and
- to limit how we can use your Sensitive Personal Information.

California residents have the right to opt-out of the sale of their Personal Information under the CCPA. However, we do not sell or share (for cross-context advertising purposes) employee, applicant, or contractor Personal Information to any third parties. If our practices change, we will update this Notice and take any other necessary action to comply with applicable law.

HAI will not retaliate or take adverse action against you for having exercised these rights.

You may exercise your rights under this statute by contacting Human Resources at HR@Housingcenter.com or 203-272-8220, ext. 400.

Within ten (10) business days: HAI will confirm receipt of the request.

Within fifteen (15) business days: HAI will comply with a request to opt-out (to the extent applicable).

Within forty-five (45) calendar days: HAI will either comply with or deny the request as applicable. We *may* require an additional forty-five (45) calendar days to respond to a request. If this is the case, we will notify you within the initial forty-five (45) day response period and provide an explanation for the delay (e.g.: we may need additional time to follow up with our service providers to confirm that they have deleted your personal information.)