



I. PURPOSE

TruGreen, LP (the “Company” or “we”) has developed this privacy policy out of respect for the privacy of our job applicants and independent contractors. This policy describes the personal information we collect, use, and disclose about individual applicants and independent contractors who apply for a position of employment or contract to do work on our behalf.

Whenever you are contracted to perform services for us or apply for a position of employment, we will collect personal information from you or about you in the course of our interaction or dealings with you.

II. SCOPE

This policy does not apply to our current and former employees and their family members, dependents, and beneficiaries; if you are a California resident who is a current or former employee of the Company or a family member, dependent, or beneficiary of any of our current or former employees, you may request access to our Employee Privacy Policy by sending an email to privacy@trugreenmail.com .

III. Collection of Personal Information and Sensitive Personal Information

In the last 12 months, we have collected the following categories of personal information about you based on your specific transactions and interactions with us. For each category of information, the categories of third parties with whom we have disclosed the information in the last 12 months are referenced by a letter that coincides with the letter in the list of categories of service providers and third parties that follows soon after this table.

Category	Examples	Disclosed in Last 12 Months To	Retention Period
Personal Identifiers	Name, alias, social security number, date of birth, driver’s license or state identification card number, passport number, employee ID number.	A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	Duration of our relationship with you plus 4 years
Contact Information	Home, postal or mailing address, email address, home phone number, cell phone number.	A, B, D, E, F, G, H, I, J, K, L, M, N, O	Duration of our relationship with you plus 4 years
Account Information	Username and password for Company accounts and systems, and any required security or access code, password, security questions, or credentials allowing access to your Company accounts.	Not Disclosed	<u>Username</u> : permanent; <u>Password or security code</u> : while in use + 1 year
Protected Classifications	Race, ethnicity, national origin, sex, gender, sexual orientation, gender identity, religious or philosophical beliefs, age, disability, medical or mental condition, veteran or military status, familial status, or language.	B, C, E, I, M, O	Duration of our relationship with you plus 4 years



Category	Examples	Disclosed in Last 12 Months To	Retention Period
Biometric Data	Fingerprints and facial recognition.	Not Disclosed other than to the vendor we engaged to process this data	While in use for identity verification
Physical Characteristics or Description	Information on your Driver's License (such as eye color, hair color, height, and weight), as well as information collected to the extent relevant for workplace investigations, or for enforcement of Company policies on appearance and grooming.	B, C, E, I, M, O	Duration of our relationship with you plus 4 years
Internet Network and Computer Activity	Internet or other electronic network activity information related to usage of Company networks, servers, intranet, shared drives, or Company-issued computers and electronic devices, including system and file access logs, security clearance level, browsing history, search history, and usage history.	B, E, F, K, N, O	4 years
Geolocation Data	IP address and/or GPS location (latitude & longitude) recorded on Company-issued computers, electronic devices, and vehicles.	B, C, K, L, N, O	4 years
Mobile Device Data	Data identifying employee's devices accessing Company networks and systems, including cell phone or tablet make, model, and serial number, cell phone or tablet number, and cell phone or tablet provider.	B, C, F, K, N, O	Duration of our relationship with you plus 4 years
Financial Information	Bank account number for direct deposit, credit card number, debit card number, routing number, ACH information, or other financial account information.	A, B, C, E, F, M	Duration of our relationship with you plus 6 years
Inferences	Based on analysis of the personal information collected, we may develop inferences regarding talent calibration, succession planning, ability to perform essential job functions, mental and physical fitness for duty, qualification/aptitude for a position, and ability to work with others.	O	Duration of our relationship with you plus 4 years



Category	Examples	Disclosed in Last 12 Months To	Retention Period
Online Portal and Mobile App Access and Usage Information	<p>Username</p> <p>Password</p> <p>Account history, usage history, file access logs, and security clearance level.</p>	B, C, E, G, H K, L, N, O	<p>Indefinitely</p> <p>Duration of relationship plus 2 years</p> <p>Duration of relationship plus 4 years.</p>
Visual, Audio or Video Recordings	<p>Surveillance camera footage, which may record or capture video or images of employees, customers, visitors, vendors, and anyone else in our stores, offices or facilities.</p> <p>Recorded virtual meetings such as recorded Zoom or Teams meetings.</p> <p>Employee pictures or photos taken for identification purposes (ID cards), or for use in a company directory or on a company website, or for other business purposes that are disclosed to the employee.</p> <p>Pictures or video taken at a company function or event, which may include employees, customers, visitors, or other third parties.</p> <p>Pictures, images, photos or videos of employees or customers posted on social media to which the company or its managers have access or that are submitted to the company by another employee, customer or third party.</p>	B, C, E, G, H, K, L, N, O	<p>90 Days</p> <p>6 years</p> <p>Duration of employment plus 6 years</p> <p>6 years</p> <p>6 years</p>
Contents of Personal	If you use Company email, phones, computers, tablets, online chat applications	O	4 years



Category	Examples	Disclosed in Last 12 Months To	Retention Period
<p>Communications where the Company is not the intended recipient</p>	<p>(Teams, Zoom, etc.) or other Company systems for personal communications where the Company is not the intended recipient of the communication, the Company retains these communications in the ordinary course of managing its communication and computer systems and pursuant to the Company's data retention policy. Independent contractors have no expectation of privacy with respect to any communications or data they send, receive, access or store on any company computer or system, including any personal communications. The Company may monitor, access, review and use all such communications and data for lawful business purposes detailed below.</p>		
<p>Pre-Hire Information</p>	<p>Information gathered in your job application, as part of background screening, motor vehicle screening, reference checks, pre-hire drug test results, information recorded in job interview notes by persons conducting job interviews for the Company, information contained in candidate evaluation records and assessments, information in work product samples you provided, and voluntary disclosures by you.</p>	<p>A, B, C, D, E, F, I, O</p>	<p>If hired, duration of our relationship plus 4 years. If not hired, 3 years from when position is filled or the date we receive your information, whichever is longer.</p>
<p>Employment and Education History</p>	<p>Information regarding prior job experience, positions held, names of prior supervisors, reasons for leaving prior jobs, and when permitted by applicable law your salary history or expectations. Information from resumes regarding educational history; information obtained from transcripts or records of degrees and vocational certifications obtained; information from records of licensing necessary to perform your work.</p>	<p>B, C, D, E, F, I, P</p>	<p>If hired, duration of our relationship plus 4 years. If not hired, it will be retained for 3 years from when position is filled or the date we receive your information, whichever is longer.</p>
<p>Professional Related Information</p>	<p>Information contained in tax forms/1099 forms, safety records, motor vehicle records, licensing and certification records, and performance records, payroll and</p>	<p>A, B, C, D, E, F, I, K, O</p>	<p>Duration of our relationship with you plus 6 years</p>



Category	Examples	Disclosed in Last 12 Months To	Retention Period
	expense records and information related to services provided by independent contractors, including in statements of work.		
Facility & Systems Access Information	Information identifying which employees accessed secure Company facilities, systems, networks, computers, VPN, and equipment and at what times using their keys, badges, fobs, login credentials, or other security access methods	B, C, E, K, N, P	1 year
Travel Information	Information regarding business travel and for infectious disease contact tracing purposes the locations traveled to within the applicable infectious period prior to coming to the workplace and the dates spent in those locations.	B, C, D, E, M	Indefinitely

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information the Company may collect from or about independent contractors or applicants:

1. Personal Identifiers (social security number, driver’s license or state identification card number, passport number)
2. Account Information (your Company account log-in, in combination with any required security or access code, password, or credentials allowing access to the account)
3. Protected Classifications (racial or ethnic origin, religious or philosophical beliefs, union membership, or sexual orientation)
4. Biometric Information (used for the purpose of uniquely identifying you)
5. Geolocation Data (IP address and/or GPS location, latitude & longitude)
6. Contents of Personal Communications (contents of mail, email, and text messages where the Company is not the intended recipient).

Personal information **does not** include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the independent contractor, applicant, or from widely distributed media.
- Information made available by a person to whom the independent contractor or applicant has disclosed the information if the independent contractor or applicant has not restricted the information to a specific audience.
- Deidentified or aggregated information.

We may collect your personal information from the following sources:

- You, when you visit any of our physical locations, when you enter into a contract to perform services for us, or when you apply for a position of employment
- Company-issued computers, electronic devices, and vehicles
- Company systems, networks, software applications, and databases you log into or use in the course of applying for employment or performing your job
- Surveillance cameras and badge entries at our physical locations
- Credit and consumer reporting agencies
- Background check agencies (including social security verification, criminal, and motor vehicle)
- Social media platforms
- Recruiters
- Staffing agencies
- Personal references and former employers
- Law enforcement
- Our other employees, contractors, vendors, suppliers, guests, visitors, customers, potential customers, and other third parties based on your interactions with them

We may disclose your personal information to/with the following categories of service providers or third parties:

- A. Financial Institutions
- B. Government Agencies
- C. Employee Tracking and Talent Management Systems
- D. Staffing or Professional Employer Organizations
- E. Human Resources Providers,
- F. Payroll Processors
- G. Communications Providers
- H. Social Media Platforms
- I. Background Check, Drug Testing and Employment Testing Providers
- J. Promotional or Other Fulfillment Vendors
- K. Security, Safety and Risk Management Vendors
- L. Our Customers and Potential Customers
- M. Travel Providers
- N. Providers that Facilitate/Maintain/Improve Business Functions
- O. Legal Providers

By referring to the letter corresponding to the category, the above table specifies to what categories of service providers and third parties we disclose personal information.

We may collect your personal information for the following business purposes:

1. **Job Applicant Purposes:**
 - a. To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job with the Company, we will use that Personal Information in connection with your candidacy for employment.



- b. To comply with local, state, and federal law and regulations requiring employers to maintain certain records, as well as local, state, and federal law, regulations, ordinances, guidelines, and orders relating to COVID-19.
- c. To evaluate your job application and candidacy for employment.
- d. To obtain and verify background check and references.
- e. To communicate with you regarding your candidacy for employment.
- f. To reduce the risk of spreading infectious diseases in or through the workplace.

2. Independent Contractor Purposes:

- a. To fulfill or meet the purpose for which you provided the information.
- b. To comply with state and federal law and regulations requiring businesses to maintain certain records (accident or safety records, and tax records/1099 forms).
- c. To engage the services of independent contractors and compensate them for services.
- d. To evaluate, make, and communicate decisions regarding an independent contractor, including decisions to hire and/or terminate.
- e. To grant independent contractors access to secure Company facilities, systems, networks, computers, and equipment, and maintain information on who accessed such facilities, systems, networks, computers, and equipment, and what they did therein or thereon.
- f. To implement, monitor, and manage electronic security measures on independent contractor devices that are used to access Company networks and systems.
- g. To evaluate, assess, and manage the Company's business relationship with vendors, service providers, and contractors that provide services to the Company.
- h. To improve user experience on Company computers, networks, devices, software applications or systems, and to debug, identify, and repair errors that impair existing intended functionality of our systems.
- i. To reduce the risk of spreading infectious diseases in or through the workplace.

We may disclose your personal information for the following business purposes as numbered above: 1(a), 1(b), 1(d), 2(a), 2(e), 2(f), 2(g), 2(h), and 2(i).

We do NOT and will not sell your personal information in exchange for monetary or other valuable consideration. We do not share your personal information for cross-context behavioral advertising.

IV. Retention of Personal Information

We will retain each category of personal information in accordance with our established data retention schedule as indicated above. In deciding how long to retain each category of personal information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; applicable statutes of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

A. Third Party Vendors

We may use other companies and individuals to perform certain functions on our behalf. Examples include administering e-mail services and running special promotions. Such parties only have access to the personal



information needed to perform these functions and may not use or store the information for any other purpose. Subscribers or site visitors will never receive unsolicited e-mail messages from vendors working on our behalf.

B. Business Transfers

In the event we sell or transfer a particular portion of its business assets, information of consumers, contractors and applicants may be one of the business assets transferred as part of the transaction. If substantially all of our assets are acquired, consumers, contractors and applicant information may be transferred as part of the acquisition.

C. Compliance with Law and Safety

We may disclose specific personal and/or sensitive personal information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect our employees or the public.

D. Passwords

The personal data record created through your registration with our website can only be accessed with the unique password associated with that record. To protect the integrity of the information contained in this record, you should not disclose or otherwise reveal your password to third parties.

V. How We Protect the Information that We Collect

The protection of the information that we collect about employees is of the utmost importance to us and we take every reasonable measure to ensure that protection, including:

- We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.

We restrict access to private information to those who need such access in the course of their duties for us.

VI. Rights Under the CCPA and CPRA

This section of the Privacy Policy applies only to California residents who are natural persons; it does not apply to any entities (whether business, non-profit or governmental). If you are a California resident, you have the following rights:

1. Right to Know. The right to request, up to 2 times in a 12-month period, that we identify to you (1) the categories of personal information we have collected, shared or sold about you, (2) the categories of sources from which the personal information was collected, (3) the business purpose for which we use this information, and (4) the categories of third parties with whom we disclose or have disclosed your personal information;
2. Right to Access. The right to request, up to 2 times in a 12-month period, that we provide you access to or disclose to you the specific pieces of personal information we have collected about you;
3. Right to Delete. The right to request, up to 2 times in a 12-month period, that we delete personal information that we have collected from you, subject to certain exceptions;
4. Right to Correct. The right to request that we correct inaccurate personal information (to the extent such an inaccuracy exists) that we maintain about you;
5. Right to Limit. The right to limit the use or disclosure of your sensitive personal information;



6. The right to designate an authorized agent to submit one of the above requests on your behalf. See below for how you can designate an authorized agent; and
7. The right to not be discriminated or retaliated against for exercising any of the above rights.

A. Submission of Requests

You Can Submit Any of the Above Types of Requests by Any of the 3 Options Below:

1. Submit an online request using our [Privacy Portal](#).
2. Call our privacy toll-free line at 1 (833) 830-2305.
3. Complete a paper form, which can be requested at privacy@trugreenmail.com or by sending us a letter at:

TruGreen, L.P.
Attn: Customer Care – Privacy 1790 Kirby Pkwy Suite 300
Memphis, TN 38138

B. How We Will Verify That it is Really You Submitting the Request

If you are a California resident, when you submit a Right to Know, Right to Access, Right to Delete, or Right to Correct request through one of the methods provided above, we will ask you to provide some information to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular information in our possession, which depends on the nature of your relationship and interaction with us. For example, we may need you to provide your name, address, email, phone number, last 4 digits of your social security number, your date of birth, or the amount of your last paycheck.

C. Responding to your Right to Know, Right to Access, Right to Delete, and Right to Correct Requests

Upon receiving a verifiable request from a California resident, we will confirm receipt of the request no later than ten (10) business days after receiving it. We endeavor to respond to a verifiable request within forty-five (45) calendar days of its receipt. If we require more time (up to an additional 45 calendar days, or 90 calendar days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable 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.

For a request to correct inaccurate personal information, we will accept, review, and consider any documentation that you provide, and we may require that you provide documentation to rebut our own documentation that the personal information is accurate. You should make a good-faith effort to provide us with all necessary information at the time that you make the request to correct. We may deny a request to correct if we have a good-faith, reasonable, and documented belief that a request to correct is fraudulent or abusive. If we deny your request to correct, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

D. Responding to Your Request to Limit the Use of Sensitive Personal Information



We will act upon a verifiable request to limit the use of sensitive personal information within fifteen (15) business days of its receipt. We will notify all third parties that use or disclose sensitive personal information of your request to limit and instruct them to comply with the request within the same time frame. We will notify you when this has been completed by mail or electronically, at your option.

A request to limit need not be a verifiable request. However, we may deny a request to limit if we have a good faith, reasonable, and documented belief that a request to limit is fraudulent. If we deny your request to limit, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

E. If You Have an Authorized Agent

If you are a California resident, you can authorize someone else as an authorized agent who can submit a request on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized power of attorney, or (b) provide other written, signed authorization that we can then verify. When we receive a request submitted on your behalf by an authorized agent who does not have a power of attorney, that person will be asked to provide written

proof that they have your permission to act on your behalf. We will also contact you and ask you for information to verify your own identity directly and not through your authorized agent. We may deny a request from an authorized agent if the agent does not provide your signed permission demonstrating that they have been authorized by you to act on your behalf.

VII. Consent To Terms and Conditions

By applying for employment or entering into an employment relationship with TruGreen, you consent to all terms and conditions expressed in this Privacy Policy.

VIII. Changes to Our Privacy Policy

As our services evolve and we perceive the need for or desirability of using personal information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check our website frequently or reach out to us periodically using the contact information provided above to stay informed of our most up-to-date Privacy Policy. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on our website.

IX. Applicants and Independent Contractors with Disabilities

This policy is in a form that is accessible to applicants and Independent Contractors with disabilities.

X. Questions About the Policy

This website is owned and operated by TruGreen, LP. If you have any questions about this Privacy Policy, please contact us at privacy@trugreenmail.com or call 1-833-830-2305.

XI. POLICY OWNER

Legal Department



XII. POLICY HISTORY

Adopted: March 2024