**SNAP-ON INCORPORATED**

**CALIFORNIA WORKFORCE PRIVACY NOTICE**

This privacy notice answers frequently asked questions about the kinds of Personal Information the Snap-on Incorporated group of companies (referred to as “**Snap-on Group**” or “**we**”) collect from you and how it is used.

This notice covers the use of Personal Information pertaining to California residents that are applicants, employees, owners, directors, officers, medical staff members contractors, and any of their emergency contacts, and any of their benefits beneficiaries. This notice would not cover the use of Personal Information related to the purchase of any products or services from Snap-on.

The protection of your Personal Information is an important concern to which we pay special attention.

Should you have any questions or concerns regarding this privacy notice, please contact the data protection manager at: DataProtectionManager@snapon.com.

1. [**What types of Personal Information do we gather?**](https://mce.eu/privacy-policy/#what-information-does-mce-gather-and-how-is-it-used-)

We may collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident, household or device ("**Personal Information**").

Personal Information does not include:

* Publicly available information from government records.
* Deidentified or aggregated information.
* Information excluded from the CCPA's scope, like: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA); and personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we may collect and process a range of Personal Information including the following categories:

|  |  |
| --- | --- |
| **Category** | **Examples (not all inclusive)** |
| A. 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. |
| B. 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, or health insurance information.Some personal information included in this category may overlap with other categories. |
| C. 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). |
| D. Biometric information. | An individual's physiological, biological or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. |
| E. Internet or other similar network activity. | Browsing history, search history, information on your interaction with a website, application, or Snap-on equipment. |
| F. Geolocation data. | Physical location or movements.  |
| G. Sensory data. | Audio, electronic, or similar information. |
| H. Professional or employment-related information. | Current or past job history, resume and employment application information, background checks, information necessary to administer employee benefits for employees and the beneficiaries of their employment benefits, information from income tax forms, information about emergency contacts, performance evaluations. |
| I. 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.  |
| J. Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. |

1. **What are the sources of the Personal Information we have gathered?**

We collect Personal Information from a variety of sources, including:

* Directly from you or your agent. For example, from documents or forms that you may provide to us to participate in Snap-on’s health or retirement benefit programs or to apply for a job position. If you are providing personal information about another person, for example to name a beneficiary, please make sure you have their authority and inform them that we will use their information consistent with the purpose that you provided it to us.
* Indirectly from you or your agent. For example, from evaluating your performance in your job position or from references provided for your application for employment
* Directly and indirectly from your electronic activity on our websites, on our networks, or during your use of an online application or business system provided by Snap-on. For example, browsing history when you visit a website while on Snap-on’s network, your downloads of programs to Snap-on equipment, or your use of Snap-on’s email.
* From third party Service Providers that provide services to us in connection with our business operations. For example, employee or candidate drug testing program administrators or employment applicant contact information from our applicant tracking system provider.
* From GPS tracking that may be in use on a company vehicle for fleet monitoring or on company applications, such as the list of calls and survey applications for Snap-on Tools employees.
* From Government agencies for purposes of verifying your eligibility for employment.
1. [**How is that Personal** [**Information used by us?**](https://protect-us.mimecast.com/s/EJ4lBkIANXwVug?domain=mce.eu)](https://mce.eu/privacy-policy/#what-types-of-personally-identifiable-information-are-collected-)

We may use your Personal Information in the following ways:

* **Business Uses, such as:**
	+ to evaluate an employment application;
	+ determining eligibility for employment;
	+ administering pay and benefits;
	+ processing employee work-related claims;
	+ establishing training and/or development requirements;
	+ conducting performance and goal reviews;
	+ assessing qualifications for a job or task;
	+ gathering evidence for disciplinary action or termination;
	+ establishing a contact in the event of an emergency;
	+ establishing beneficiaries and administering their benefits;
	+ reporting on company metrics;
	+ compiling directories;
	+ complying with applicable labor or employment statutes;
	+ arranging travel;
	+ conducting fleet management;
	+ ensuring the security of company-held information; and
	+ other purposes as are reasonably required by the Snap-on Group based on the context of your relationship.
1. **Who should I contact with questions about this Privacy Notice?**

If you have any questions or comments about this Privacy Notice or need accommodation to access this Privacy Notice, you may ccontacting our data protection manager at DataProtectionManager@snapon.com.

1. [**Modifications to this Privacy Statement**](https://mce.eu/privacy-policy/#modifications-to-this-privacy-statement)

We reserve the right to modify this Privacy Notice at any time and without prior notice, subject to applicable legal requirements to notify you or obtain your consent. This version is dated, July 1, 2020.