

Your privacy is important to us. This Privacy Policy ("Policy") describes Divisions Maintenance Group, Inc.'s ("DMG," "us," "we", or "our") practices with respect to the personal information we gather on our websites located at www.divisionsmg.com, www.mydivisions.com, www.DMG360.com, and www.dmgpro.com (the "Sites"), and through our mobile applications, In Position and DMG Pro (the "Apps"), as well as our offline data collection practices (collectively, the "Services"). If you are a California resident, please visit Section 9 below for more information about your rights under the California Consumer Privacy Act, as amended (the "CCPA").

For purposes of this Policy, "Personal Information" means any information that, by itself or in combination with other information, identifies or can reasonably be used to identify an individual or household, such as name, email address, IP address, telephone number, address, billing information or date of birth. Personal Information does not include information that is anonymized.

1. What information do we collect

Within the past 12 months we have collected the following categories of Personal Information. The Personal Information we collect about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below. Unless otherwise noted, the disclosures in this Policy cover our activities in the 12 months prior to the Effective Date, as well as our current practices.

- **Identifiers**, including real name, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- **Personal information described in Cal. Civ. Code § 1798.80(e) and U.S. federal law**, including name, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, or other financial information
- **Characteristics of protected classifications** under California or U.S. federal law, including age and date of birth, race, ancestry, ethnic origin, sex, gender, sexual orientation, gender identity, religion or creed, military or veteran status, medical condition, disability, marital status.
- **Internet or other electronic network activity information**, including browsing history, search history, and information regarding your interactions with our Sites, Apps, or advertisements.
- **Geolocation data**, including location data inferred from your device IP address.
- **Audio, electronic, visual, or similar information**, including phone calls, video conferencing, photos, and CCTV footage.
- **Inferences** used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We also collect some Personal Information that does not directly fit within one of the categories above. For example, we collect the contents of communications you send to us.

2. How we collect information

We may collect information about you in several ways, including:

- Directly from you, such as when you register with our Services, voluntarily provide it through your interaction with our Services, or communicate with us
- Automatically when you use our Services
- When you interact with us by phone or through videoconferencing technology or visit one of our offices or job sites

- From service providers that help us to run our business (such as those that host or support the Services, provide analytic, communications, marketing, or data storage services, or otherwise perform functions on our behalf to help us operate our business)
- From third parties, which may include sources of Project Material, internet service providers, ad networks, social networks, data brokers, background check vendors, and individuals who may submit Personal Information about you
- Government records

We may combine information we receive from the various sources described in this Privacy Policy with Personal Information and use or disclose it for the purposes identified below.

3. How we use personal information

Generally, we collect Personal Information for the following purposes. The specific purposes for which we collect your Personal Information may vary depending on the nature of your relationship with us.

- Facilitate your use of our Services;
- Contact you about the Sites or Apps;
- Notify you about important changes to the Sites or Apps;
- Evaluate products or services we could offer to you;
- Monitor or improve use of the Sites or Apps;
- Compare and otherwise use data entered by users for any purpose including consulting, research and marketing; customize any advertising and content you see on the Sites or Apps;
- Notify you of trade specific project opportunities for which you via responses to our profile questions have indicated may be of interest to you;
- Share business contact information, obtained by us from sources of Project Material, between you and others who are either: unpaid Users invited to review Project Materials or a paid User to one of the Sites or Apps;
- Provide specific information to you from us;
- Send you promotional material from us;
- Detect and prevent fraud against you and or/us;
- Comply with applicable laws and regulations;
- Depending on your mobile device or App permission settings, our Apps may collect geolocation information and other information (for example, pair and access Bluetooth devices, view Wi-Fi and network connections, or receive data from the internet). If you do not consent to our collection of App permissions then this may impact on our ability to provide our Services, or features to you and the functionality of the App.

No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

We may use Sensitive Personal Information to comply with government reporting requirements and other legal obligations, to manage the security of our premises and job sites, systems and your account, and to provide reasonable accommodations.

In addition to the purposes described above, we may use and disclose any category of Personal Information we collect to respond to law enforcement requests, or as otherwise required or authorized by applicable law, court order, or governmental regulations; to

protect our rights and interests and those of others; to resolve any disputes; to enforce our policies; and to evaluate or conduct a merger, sale, or other acquisition of some or all of our assets. We also reserve the right to use Personal Information we collect for any other purpose identified in an applicable privacy notice, click-through agreement, or other agreement between you and us, or otherwise with your consent.

4. Personal information retention

We keep the categories of Personal Information described above for as long as is necessary for the purposes described in this Policy or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- The information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

5. Marketing opt-out

You may opt-out of receiving promotional or marketing emails at any time by notifying us as a reply to any unwanted e-mail, by using the unsubscribe function in our newsletter, contacting us at it@divisionsinc.com, or by writing to Divisions Maintenance Group, Inc. Attn: DMG IT Privacy Advocate, 50 West 5th Street, Cincinnati, Ohio 45202. Requests to unsubscribe from DMG e-mails may take 5 business days to process.

6. Cookies

We may use third-party technology such as Google to collect and use data in connection with your activity on the Sites, including for interest-based advertising purposes. For example, we have implemented Google Analytics Advertising features such as dynamic remarketing, interest-based advertising, audience targeting, behavioral reporting, demographics and interests reporting, user segment analysis, device reporting, display advertising, and video ads reporting. These ad technology companies and advertisers may use, store, or access cookies and other tracking technologies to collect or receive information from the Sites, and elsewhere on the Internet and use that information to create a profile of you, measure your interests, detect your demographics, detect your location, detect your device, personalize content, and provide advertising services to us, including advertisements targeted to your interests.

If you are concerned about the potential use of the data gathered from your browser by cookies, you may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of our Sites.

[Blocking cookies in your browser](#): Browsers allow you to remove or reject cookies. To do this, follow the instructions in your browser settings. For more information about cookies and how to manage or delete them on your device, please visit www.allaboutcookies.org.

[Advertising industry opt-out tools](#): You can also use the following opt-out options to limit use of your information for interest-based advertising by participating companies:

- Digital advertising Alliance: <https://optout.aboutads.info>
- Network Advertising Initiative: <https://optout.networkadvertising.org>

You may choose not to receive some interest-based advertising by submitting opt-outs. Some of the advertisers and service providers that perform advertising-related services for us may participate in the DAA's Self-Regulatory Program for Online Behavioral Advertising and/or the Network Advertising Initiative ("NAI"). To learn more about how you can exercise certain choices regarding interest-based advertising, including use of cross-device data for serving ads, visit <http://www.aboutads.info/choices/>. To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that opting out only means that those selected members should no longer deliver certain interest-based advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks).

Platforms opt-outs: The following advertising partners offer opt-out features that let you opt-out of use of your information for interest-based advertising:

- Google: <https://adssettings.google.com>
- Facebook: <https://www.facebook.com/about/ads>

Blocking advertising ID use in your mobile settings: Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

Using privacy plug-ins or browsers: You can block our Sites from setting cookies used for interest-based ads by using a browser with privacy features or installing browser plugins and configuring them to block third party cookies/trackers.

For more information on how Google Analytics uses the data it collects, visit: google.com/policies/privacy/partners/. To opt out of Google Analytics, visit: tools.google.com/dlpage/gaoptout/. To adjust your Google advertising settings, visit: adssettings.google.com

7. Children

Our Sites are not intended for children under 13 years of age. No one under age 13 may provide any information to us through the Sites. We do not knowingly collect Personal Information from children under 13. If you are under 13, do not access, use, or provide any information on the Sites or on or through any of its features. If we learn we have collected or received Personal Information from a child under 13 without parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us by sending us an email at it@divisionsinc.com, or by writing to Divisions Maintenance Group, Inc. Attn: DMG IT Privacy Advocate, 50 West 5th Street, Cincinnati, Ohio 45202.

8. Protecting personal information

We take commercially reasonable steps to protect your Personal Information when you transmit it from your computer to the Sites and to protect such information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. You should keep in mind that no Internet transmission is ever 100% secure or error-free. In particular, e-mail sent to or from the Sites may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. Where you use passwords, ID numbers, or other special access features on the Sites, it is your responsibility to safeguard them.

9. Notice to California residents

Personal Information Collection, Sources, and Disclosures

We may collect, use, and disclose Personal Information for business purposes consistent with applicable laws as identified below. Where we transfer applicable Personal Information to recipients, such as our service providers, it does so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to Whom Consumer Personal Information May be Disclosed for a Business Purpose
Identifiers, including real name, alias, postal address, unique personal	· Facilitate your use of our Services · Contact you about the Sites	· Service Providers · Data Analytics Providers

identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers	· Notify you about important changes to the Sites · Evaluate products or services we could offer to you · Monitor or improve use of the Sites · Compare and otherwise use data entered by users for any purpose including consulting, research, and marketing; customize any advertising and content you see on the Sites · Notify you of trade specific project opportunities for which you via responses to our profile questions have indicated may be of interest to you · Share business contact information, obtained by us from sources of Project Material, between you and others who are either: unpaid Users invited to review Project Materials or a paid User to one of the Sites · Provide specific information to you from us and/or our affiliates · Send you promotional material from us and/or our affiliates · Detect and prevent fraud against you and or/us · Comply with applicable laws and regulations	· Security Providers · Background check vendors · Information technology vendors · Law Enforcement
Personal information described in Cal. Civ. Code § 1798.80(e), including 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, or other financial information	· Facilitate your use of our Services · Contact you about the Sites · Notify you about important changes to the Sites · Evaluate products or services we could offer to you · Monitor or improve use of the Sites · Compare and otherwise use data entered by users for any purpose including consulting, research and marketing customize any advertising and content you see on the Sites · Notify you of trade specific project opportunities for which you via responses to our profile questions have indicated may be of interest to you · Share business contact information, obtained by us from sources of Project Material, between you and others who	· Service Providers · Data Analytics Providers · Security Providers · Background check vendors · Information technology vendors · Law Enforcement

	are either: unpaid Users invited to review Project Materials or a paid User to one of the Sites · Provide specific information to you from us and/or our affiliates · Send you promotional material from us and/or our affiliates · Detect and prevent fraud against you and or/us · Comply with applicable laws and regulations	
Characteristics of protected classifications under California or federal law, including age and date of birth, marital status, race, ancestry, ethnic origin, sex, gender, sexual orientation, gender identity, religion or creed, military or veteran status, medical condition, genetic information, disability	· Detect and prevent fraud against you and or/us · Comply with applicable laws and regulations	· Service Providers · Background check vendors · Law Enforcement
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	· Facilitate your use of our Services · Evaluate products or services we could offer to you · Monitor or improve use of the Sites · Compare and otherwise use data entered by users for any purpose including consulting, research and marketing customize any advertising and content you see on the Sites · Notify you of trade specific project opportunities for which you via responses to our profile questions have indicated may be of interest to you · Share business contact information, obtained by us from sources of Project Material, between you and others who are either: unpaid Users invited to review Project Materials or a paid User to one of the Sites · Detect and prevent fraud against you and or/us · Comply with applicable laws and regulations	· Service Providers · Data Analytics Providers · Security Providers · Information technology vendors · Law Enforcement
Internet or other electronic network activity information, including Internet or other similar activity, browsing history,	· Facilitate your use of our Services · Evaluate products or services we could offer to you	· Service Providers · Data Analytics Providers · Security Providers

search history, information on a consumer's interaction with a website, application logs, device data and registration, social media account information or advertisement	· Monitor or improve use of the Sites · Compare and otherwise use data entered by users for any purpose including consulting, research, and marketing; customize any advertising and content you see on the Sites · Notify you of trade specific project opportunities for which you via responses to our profile questions have indicated may be of interest to you · Share business contact information, obtained by us from sources of Project Material, between you and others who are either: unpaid Users invited to review Project Materials or a paid User to one of the Sites · Provide specific information to you from us and/or our affiliates · Send you promotional material from us and/or our affiliates · Detect and prevent fraud against you and or/us · Comply with applicable laws and regulations	· Information technology vendors · Law Enforcement
Geolocation data	· Provide specific information to you from us and/or our affiliates · Send you promotional material from us and/or our affiliates · Detect and prevent fraud against you and or/us · Comply with applicable laws and regulations	· Service Providers · Data Analytics Providers · Law Enforcement
Professional or employment-related information <i>If you are a DMG employee, please see our California Employee Privacy Notice for additional disclosures. Job applicants can find additional disclosures here:</i> https://www.jobvite.com/privacy-policy/ and https://divisionsmg.com/careers/	· Evaluate products or services we could offer to you · Notify you of trade specific project opportunities for which you via responses to our profile questions have indicated may be of interest to you · Share business contact information, obtained by us from sources of Project Material, between you and others who are either: unpaid Users invited to review Project Materials or a paid User to one of the Sites · Provide specific information to you from us and/or our affiliates	· Service Providers · Data Analytics Providers · Security Providers · Background check vendors · Information technology vendors

	· Send you promotional material from us and/or our affiliates · Comply with applicable laws and regulations	
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We also collect some Personal Information that does not directly fit within one of the categories defined by the CCPA. For example, we collect the contents of communications you send to us. We may also collect, use, and disclose personal information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our or others’ rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations. Likewise, we may use and disclose personal information to other parties in connection with the sale, assignment, merger, reorganization, or other transfer. Unless otherwise specified, the sources of this Personal Information, the purposes for which we use it, and the categories of persons to which we disclose it are the same as those listed for Commercial Information.

We may disclose each of the categories of Personal Information identified above to the respectively identified categories of recipients for operational or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible with the context in which the Personal Information was collected, including, but not limited to:

- Auditing our ads;
- Helping to ensure security and integrity of your Personal Information;
- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Internal research for technological development; and
- Verifying the quality and/or safety of our devices.

Sensitive Personal Information

Within the past 12 months, we collected the categories of Sensitive Personal Information about California consumers that are indicated in the chart below. Note that the Sensitive Personal Information we collect may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

Category of Sensitive Personal Information	Categories of Sources from which Information was Collected	Purposes for Collection, Use and Disclosure
Personal Information that reveals a consumer’s Social Security, driver’s license, state identification card, or passport number	· Directly from you · Automatically when you use our Services · Advertising networks · Internet service providers · Data analytics providers · Government entities · Social networks · Data brokers	· To comply with government reporting requirements and other legal obligations, or with law enforcement requests · To manage the security of our premises and job sites, systems and your account · To provide reasonable accommodations

Personal Information that reveals a consumer's precise geolocation (location within a radius of 1,850 feet)	· Directly from you · Automatically when you use our Services, specifically, the Apps	· To comply with government reporting requirements and other legal obligations, or with law enforcement requests · To manage the security of our premises and job sites, systems and your account · To provide reasonable accommodations
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We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

How We Disclose, Share, and Sell Personal Information

Within the preceding 12 months, we have not sold or shared for cross-context behavioral advertising the personal information of California consumers. We do not have actual knowledge that we sell or share the Personal Information of consumers under 16 years of age.

Submitting Requests Relating to Your Personal Information

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request via email to ccpa@divisionsinc.com or call our toll-free CCPA Request Hotline at (855) 544-8232. Please note that, if you submit a request to know, request to delete, or request to correct, you will be asked to verify your identity before we can respond. You may be required to provide the following information that we will match against our records to verify your identity for verification purposes:

- Your first and last name;
- Your address;
- Your e-mail address;
- Your telephone number,
- Your Work Order number.

You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the email address or toll-free number listed above.

Right to Know. You have the right to know what Personal Information we have collected about you, which includes:

1. The categories of Personal Information we have collected about you, including
 - a. The categories of sources from which the Personal Information was collected
 - b. Our business purposes for collecting and disclosing Personal Information
 - c. The categories of recipients to which we disclose Personal Information
2. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information
3. The specific pieces of Personal Information we have collected about you.

Right to Delete Your Personal Information. You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

Right to Correct Inaccurate Information. If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt Out of Sales and Sharing of Personal Information.

California consumers have the right to opt out of the sale of Personal Information, and to request that businesses do not share Personal Information for cross-context behavioral advertising. We do not sell or share for cross-context behavioral advertising your Personal Information, and therefore, we do not offer a method to exercise this right.

Right to Limit Use and Disclosure of Sensitive Personal Information. We will not use Sensitive Personal Information for the purpose of inferring characteristics about you, or for any other reasons besides the permitted purposes. For this reason, we do not treat the Sensitive Personal Information we collect as subject to a Limit the Use of My Sensitive Personal Information request and, therefore, we do not offer a way for you to submit such a request.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

10. Comments and questions

We welcome comments and questions regarding this Privacy Policy. Any such questions should be directed via e-mail to it@divisionsinc.com. Additionally, you may make your request in writing to Divisions Maintenance Group, Inc. Attn: DMG IT Privacy Advocate, 50 West 5th Street, Cincinnati, Ohio 45202.