

# CALIFORNIA DATA PRIVACY NOTICE

## 1. PURPOSE OF THIS NOTICE

The purpose of this Data Privacy Notice (“**Notice**”) is to inform you, as an employee of Aerojet Rocketdyne Holdings, Inc., and its subsidiaries (“**Company**”, “**we**” or “**our**”) about our practices regarding the collection, use, disclosure, transfer, and other processing of your work-related Personal Information (“**Personal Information**”). This Notice also applies to you if you are a temporary worker, contingent worker or independent contractor, as well as to regular employees (although nothing in this Notice creates a relationship of employment between the Company and any temporary worker, contingent worker or independent contractor). The Company strives to process any Personal Information fairly, in good faith and in accordance with applicable laws. The Company adopts this notice to comply with the California Consumer Privacy Act of 2018 (CCPA).

This Notice explains what kinds of Personal Information we collect, how we collect it, why we collect it, what we use it for, how we may share it, and various other data handling practices we have at the Company. A general description of the Company’s data handling practices is set out in this Notice. However, please consult the Company’s Policies for more specific information on our other practices. Unless otherwise indicated, to the extent the terms of this Notice and the Company’s policies concerning data protection are in conflict, the terms of this Notice will prevail and take precedence.

## 2. PERSONAL INFORMATION COLLECTED

We 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 consumer, household, or device (“personal information”). Personal information **does not** include:

- publicly available information from government records.
- deidentified or aggregated consumer 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) or clinical trial data;
  - 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, the Company has collected the following categories of personal information from its employee consumers within the last twelve (12) months:

Category	Examples	Collected
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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.	YES
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.	YES
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).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO

I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. 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.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

The Company obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete to apply for a job or to obtain benefits.
- Indirectly from you. For example, from observing your actions on our Website.

### **3. PURPOSES AND LEGAL GROUNDS FOR WHICH COMPANY WILL COLLECT AND USE YOUR PERSONAL INFORMATION**

Company will typically collect and use the Personal Information it collects from you for the following legal grounds:

- To select and effectively manage the Company workforce;
- Internal and external investigations or evaluations;
- Granting and maintenance of governmental clearances
- Protection of Company or third party assets under Company possession or control;
- the compliance with our legal obligations (e.g. our obligations to you as your employer under employment and health and safety legislation, and under statutory codes of practice); and
- presence of a legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. We may for example have a legitimate interest in business security and defending our (legal) interests.

The processing of your Personal Information is based on legal requirements and business interests. In particular, we process data as necessary for our management of your employment and in order to administer payroll, improve and maintain the administration of employee benefits, facilitate the management of work and employees, establish career plans and paths, engage in recruiting, investigate any potential misconduct, operate and protect our IT and communications systems, and comply with record keeping and other legal obligations.

The Company may also process information relating to sensitive Personal Information requiring higher levels of protection if and to the extent we are permitted to do so by law. Processing will typically be necessary for one of the following reasons:

- for carrying out obligations under employment law;
- for reasons of substantial public interest (e.g. equality of opportunity or treatment);
- for establishing, exercising or defending legal claims; or
- for the purposes of occupational medicine, or for assessing an employee's working capacity.

We will notify you of any material changes to Personal Information we collect or to the purposes for which we collect and process it.

#### **4. THIRD PARTIES**

We use third party service providers to process Personal Information for many of the Company's business functions. This includes collecting Personal Information about you for the purposes described herein and in the Data Protection Policies already in place. Such service providers are limited, by contract, to process Personal Information for the purposes we specify. These service providers may not use Personal Information for any purposes unrelated to the agreement we have with them, and they are required to maintain protections over Personal Information consistent with the way the Company protects Personal Information.

The Company will typically collect Personal Information about you from the following third parties:

- Background screening companies;
- Financial institutions;
- Government entities;
- Educational institutions;
- Healthcare providers;
- Insurance companies and administrators; and
- Publicly available government databases.

The Company does not sell Personal Information to unaffiliated third parties as a general course of business. However, Personal Information may be sold to a third party as part of a business transaction where some or all of the assets of the Company are acquired by a third party.

## **5. RETENTION AND SECURITY**

Company will retain information about you for as long as necessary, both during and after the period of your employment, for the purposes for which it was collected, to defend or advance legal claims, or as otherwise required by applicable law.

We have in place appropriate security measures to prevent your Personal Information from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your Personal Information to those who have a genuine business need to know it. Those processing your Personal Information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so in accordance with applicable timeframes.

## **6. YOUR RIGHTS**

You may access and/or request a copy of your Personal Information. From time to time, we may ask you to review and update the Personal Information we hold about you.

You may review or make certain corrections to your Personal Information through the online tools the Company provides. You may also request the deletion, rectification or limitation of your Personal Information or limitation of the processing activities as required by law. Furthermore you may object to the processing of your Personal Information where you are permitted by law to do so by use of the online tools the Company provides, or by contacting your Human Resources Business Partner or by emailing [Privacy@rocket.com](mailto:Privacy@rocket.com). These rights may be subject to legal restrictions as provided by applicable law. In the event that we do not accept your request for deletion, correction, rectification, or limitation of the processing activities, we will provide you with the legal basis for such rejection.