

## Multi-State Notice at Collection and Privacy Policy

**Effective Date:** 1/1/2026

**Last Revised/Reviewed on:** 1/1/2026

This Multi-State Notice at Collection and Privacy Policy ("State Privacy Disclosure") explains how JHNA and its subsidiaries and affiliates ("we" "us", "our", or "Company") collect, use, disclose, sell, share, and/or retain personal information ("Information Practices") subject to applicable U.S. state privacy laws.

Certain states provide specific rights to their residents as listed below. While we will attempt to respond to requests from any U.S. resident, we reserve the right to deny requests if permitted under applicable law. Unless you are a California resident, any rights that may be available in your state are not afforded to you under this State Privacy Disclosure while you are operating in your commercial or employment capacity.

The terms used in this State Privacy Disclosure shall have the same or similar meaning as those terms in each of the applicable laws, or the closest approximation of such terms.

### NOTICE AT COLLECTION

The following notice identifies the categories of personal information to be collected from you and the purposes for which the personal information will be used, including whether that information is sold or shared for the purposes of cross-context behavioral advertising (*e.g.*, targeted advertising).

#### General Personal Information

Categories of Personal Information	Purposes for Collection, Use, or Processing	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising
<b>Identifiers:</b> For example, a name, address, online identifier, internet protocol ("IP") address, email address, or other similar identifiers.	<ul style="list-style-type: none"><li>• To fulfill or meet the reason for which the information is provided.</li><li>• For our internal operational purposes</li><li>• For auditing relating to consumer transactions, including ad impressions and compliance with regulations.</li><li>• Fraud and security detection.</li><li>• Debugging to identify and repair errors.</li><li>• Short-term data use for the current interaction that is not used to build a profile.</li><li>• Servicing transactions and accounts (<i>e.g.</i>, customer service, maintaining and servicing accounts, customer verification, payment</li></ul>	No
<b>(Pursuant to California Law)</b> <b>Personal Information Categories from Cal. Civ. Code § 1798.80(e):</b> For example, a name, social security number, address, telephone number, credit card number, or debit card number.		No
<b>(Pursuant to California Law)</b>		No

Categories of Personal Information	Purposes for Collection, Use, or Processing	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising
<b>Characteristics of CA or Federal Protected Classifications:</b> For example, age (40 and over).	<p>processing) and providing our products and any additional services (e.g., financing).</p> <ul style="list-style-type: none"> <li>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.</li> <li>Undertaking internal research for technological development and demonstration.</li> <li>To share the personal information with service providers to carry out other business purposes requested by us.</li> </ul>	
<b>Internet or Other Similar Network Activity:</b> For example, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.		No
<b>Geolocation Data:</b> For example, information that can be used to determine a device's physical location.		No
<b>Sensory or Surveillance Data:</b> For example, call recordings, other audio, electronic, or visual monitoring or surveillance data.		No
<b>Professional or Employment-Related Information:</b> For example, current and past compensation and employment history.		No

**We do not collect: Commercial information, biometric information, education information or profile data.**

**Sensitive Personal Information**

Categories of Sensitive Personal Information	Purposes for Collection, Use, or Processing	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising
Social Security Number, Driver's License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> <li>To perform services or provide goods you request and reasonably expect from us</li> <li>To detect, prevent, and investigate security incidents involving your information</li> </ul>	No

Categories of Sensitive Personal Information	Purposes for Collection, Use, or Processing	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising
Account log-in information when provided with any required security or access code, password, or credentials, allowing access to an account	<ul style="list-style-type: none"> <li>• To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> <li>• To ensure the safety of you and others</li> <li>• To enhance your experience on our website in real time, so long as we do not disclose your information to a third party</li> </ul>	No
Citizenship or immigration status	<ul style="list-style-type: none"> <li>• To perform services for our business needs, such as maintaining accounts, providing customer service, and fulfilling orders</li> <li>• To ensure the quality or safety of a product, service, or device</li> <li>• To comply with federal government requirements for employment, payroll, background investigations, and security clearance processing (including submission of SF-86 and related forms)</li> <li>• To verify identity and U.S. person status required under ITAR, EAR, and other export-control regulations</li> <li>• To issue Common Access Cards (CAC), enroll fingerprints for DoD base access systems, or meet other U.S. Government-mandated facility access requirements</li> <li>• To detect and prevent fraud or unauthorized access to classified or controlled information</li> <li>• To maintain and secure employee and contractor accounts on company systems</li> </ul>	No

**We do not collect:** Financial account number, debit card number, or credit card number in combination with any required security or access code; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, employee's, or contractor's private mail, email, or text messages; precise geolocation data; biometric data, genetic data; health information, including mental or physical health conditions or diagnoses; Information concerning sex life, sexual orientation, or gender identity; data collected from a known child; status as a crime victim; and neural data.

#### **Retention Periods**

The period of time for which we retain information depends on the purposes for which we collect or use that information. We will delete or de-identify information when it is no longer needed to fulfill the purposes listed for each category above, unless a longer retention period is required to comply with applicable laws. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing of your information.

The period of time for which we retain information depends on the purposes for which we collect or use that information. We will delete or de-identify information when it is no longer needed to fulfill the purposes listed for each category above, unless a longer retention period is required to comply with applicable laws. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing your information.<sup>1</sup>

#### **Notice of Sale and/or Share**

We do not sell or share Personal Information for targeted or cross-context behavioral advertising.

Please review our Multi-State Privacy Policy below.

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<sup>1</sup> **Note to Draft:** Retention policy subject to the Company's review.

## PRIVACY POLICY

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding our Information Practices. You have certain rights to control how your personal information is used. This privacy policy describes your rights as they relate to our Information Practices as to your personal information and how you can exercise those rights.

The following table includes disclosures for the preceding 12 months: the categories of personal information we have collected about consumers, the categories we have disclosed for a business purpose, and the categories of third parties with whom we shared the personal information during that period.

### General Personal Information

Category	In the preceding 12 months, this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of recipients to whom the information was disclosed
	Collected	Disclosed to Third Parties		
Identifiers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• To fulfill or meet the reason for which the information is provided.</li> <li>• For our internal operational purposes</li> <li>• For auditing relating to consumer transactions, including ad impressions and compliance with regulations.</li> <li>• Fraud and security detection.</li> <li>• Debugging to identify and repair errors.</li> <li>• Short-term data use for the current interaction that is not used to build a profile.</li> <li>• Servicing transactions and accounts (e.g., customer service, maintaining and servicing accounts, customer verification, payment processing) and providing our</li> </ul>	<ul style="list-style-type: none"> <li>• Web/data analytics providers</li> <li>• Web hosting service providers</li> <li>• Cybersecurity and fraud detection service providers</li> <li>• Social media networks</li> <li>• U.S. Government agencies and contractors</li> <li>• Service providers that process data on our behalf</li> <li>• Professional service providers</li> </ul>
<b>(Pursuant to California Law)</b> Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<b>(Pursuant to California Law)</b> Characteristics of California or federally protected Classifications	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Commercial Information	<input type="checkbox"/>	<input type="checkbox"/>		
Biometric Information	<input type="checkbox"/>	<input type="checkbox"/>		

Category	In the preceding 12 months, this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of recipients to whom the information was disclosed
	Collected	Disclosed to Third Parties		
Internet or Other Similar Network Activity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>products and any additional services (e.g., financing).</p> <ul style="list-style-type: none"> <li>• To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.</li> <li>• Undertaking internal research for technological development and demonstration.</li> <li>• To share the personal information with service providers to carry out other business purposes requested by us.</li> </ul>	
Geolocation Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Sensory or Surveillance Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Professional or Employment-Related Information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Education Information	<input type="checkbox"/>	<input type="checkbox"/>		
<b>(Pursuant to California Law)</b> Profile Data	<input type="checkbox"/>	<input type="checkbox"/>		

#### **Sensitive Personal Information**

Unless otherwise allowed by applicable state law, we will only collect certain types of sensitive personal information with your consent. We do not use or disclose the following sensitive personal information for purposes other than those business purposes specifically enumerated under applicable state law, including California. As a result, we do not offer the right to limit our use or disclosure of these categories of sensitive personal information.

Category	In the preceding 12 months, this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of recipientsto whom the information was disclosed
	Collected	Disclosed		
Social Security Number, Driver's License, State Identification Card, or Passport Number	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• To perform services or provide goods you request and reasonably expect from us</li> <li>• To detect, prevent, and investigate security incidents involving your information</li> <li>• To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible</li> <li>• To ensure the safety of you and others</li> <li>• To enhance your experience on our website in real time, so long as we do not disclose your information to a third party</li> <li>• To perform services for our business needs, such as maintaining accounts, providing customer service, and fulfilling orders</li> <li>• To ensure the quality or safety of a product, service, or device</li> <li>• To collect or process sensitive personal information where such information is not being used to infer characteristics about you, but may be used to provide a specific good or service based on the sensitive information you provided</li> </ul>	<ul style="list-style-type: none"> <li>• U.S. Government agencies and authorized contractors</li> <li>• Service providers contractually obligated to process Sensitive PI on our behalf</li> <li>• Professional service providers</li> </ul>
Account log-in, password, or credentials allowing access to an account	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Precise geolocation	<input type="checkbox"/>	<input type="checkbox"/>		
Citizenship or immigration status	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Biometric data	<input type="checkbox"/>	<input type="checkbox"/>		

**We do not collect:** Financial account number, debit card number, or credit card number in combination

with any required security or access code; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, employee's, or contractor's private mail, email, or text messages; genetic data; health information, including mental or physical health conditions or diagnoses; Information concerning sex life, sexual orientation, or gender identity; data collected from a known child; status as a crime victim; neural data.

The categories identified as collected in the tables above were collected from the following categories of sources:

- You directly
- Fraud monitoring services
- Operating systems and platforms
- Internet service providers
- Data analytics providers
- Public record sources
- Government entities
- Operating systems and platforms
- Professional Organizations
- Recruitment Organizations or Firms

#### **What We Sell to Third Parties or Share with Third Parties for Cross-Context Behavioral Advertising and Right to Opt-Out**

We do not sell or share personal information, including sensitive information, as described in the tables above.

#### **Your Right to Know**

Certain states, including California, provide the right to request our disclosure of any of the following:

- the categories of personal information we have collected about you
- the categories of sources from which the personal information is collected
- the business or commercial purpose for collecting, selling, or sharing with third parties for cross-context behavioral advertising (*e.g.*, targeted advertising)
- the categories of third parties to whom we disclose personal information
- the specific pieces of personal information we have collected about you

You can do this through a verified consumer request. That process is described in the section below, "How to Exercise Your Rights."

#### **Your Right to Request Correction of Inaccurate Personal Information**

Certain states, including California, provide you the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used for the purpose of correcting your personal information and complying with our recordkeeping requirements.



As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under applicable law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section "How to Exercise Your Rights."

### **Your Right to Request Deletion of Your Personal Information**

Certain states, including California, provide the right to request that we delete any of your personal information, subject to certain exceptions. You can do this through a verified consumer request. That process is described in the section below, "How to Exercise Your Rights."

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

### **How to Exercise Your Rights**

You may exercise your rights, as applicable, by submitting a verified consumer request to know information (and to receive your personal information in a portable format), to correct information, or for deletion.

The response to a request to know will provide the personal information we have collected and maintained about you, in a portable format, unless an exception under applicable state law applies. Please note that, depending on the applicable state law, we may not be required to provide you with personal information if you make multiple requests within a certain time period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You can also place a request by calling [INSERT TOLL FREE NUMBER]<sup>2</sup>, email us at [hr@jhna.com](mailto:hr@jhna.com), or mailing us your request at the address below. If you call that toll-free number, email, or mail us your request, we ask that you provide the same information requested on the web form in order for us to authenticate your request. Your request, either over the phone, via email, or via mail, will be verified using your work email address and date of hire, last four digits of your social security number, and department, other information reasonably necessary to verify your identity.

If you submit a request that is not through one of the above designated methods or is deficient in some manner unrelated to verification, we will provide you with information on how to submit the request or remedy any deficiencies with your request.

Once we receive your verifiable consumer request, we will confirm receipt within 10 business days, or as permitted by applicable law, and describe our verification process. We will respond to your request within 45 calendar days, or as permitted by applicable law, if we can verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

### **Using an Authorized Agent to Submit a Request**

**California:** Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have authorized to act on your behalf, may make a verifiable consumer request related to your personal information, to opt out of sale or sharing, or to limit the use

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<sup>2</sup> **Note to Draft:** Company to provide toll free number.

or disclosure of your sensitive personal information. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to provide the authorized agent signed permission to submit a request, verify your identity directly by submitting a verified consumer request according to the procedures in the section "How to Exercise Your Rights," and directly confirm with us that you provided the authorized agent permission to submit the request. To submit authorized agent documentation, contact us at [hr@jhna.com](mailto:hr@jhna.com)

Other States: If you use an authorized agent, you may provide a power of attorney executed pursuant to applicable state law. If a power of attorney is not submitted, you may be required to provide commercially reasonable identification of your identity and evidence of your authorized agent's authority to act on your behalf. For example, you may need to give the authorized agent signed permission to submit a request, verify your identity directly by submitting a verified consumer request according to the procedures in the section "How to Exercise Your Rights," and directly confirm with us that you provided the authorized agent permission to submit the request by contacting us at [hr@jhna.com](mailto:hr@jhna.com).].

#### **Opt-Out Preference Signals/Universal Opt-Out Mechanism**

We do not sell or share Personal Information for targeted or cross-context behavioral advertising. Because we do not engage in these activities, browser-based opt-out preference signals (such as Global Privacy Control) do not change how we process your information for advertising purposes. If our practices change in the future, we will update this Privacy Notice and comply with any applicable requirements regarding such signals.

#### **Your Right to Non-Discrimination for the Exercise of a Privacy Right**

We will not discriminate against you for exercising any of your state privacy rights.

<b>Supplemental U.S. State Privacy Rights</b>
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In addition to the privacy rights listed above, certain states provide supplemental privacy rights to residents of those states.

#### **Right to Opt-Out of Certain Profiling**

You have the right to opt out of our use of profiling when used to make decisions that produce a legal or similarly significant effect concerning you or your interactions with us. Currently, we do not engage in such profiling.

#### **Right to Appeal**

You have the right to appeal our refusal to take action on, or respond to, a verified consumer request. Upon receipt of our denial or refusal to take action on, or to respond to, a verified consumer request, a consumer has 90 days to submit a request to appeal our decision by mail. We will timely inform you in writing of any action taken or not taken in response. We will also include a written explanation of the reasons for our decision.

#### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

#### **Contact for More Information**

If you have any questions or comments about this notice, the ways in which we collect and use your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at: **hr@jhna.com**.

**Phone:** 1- 877-200-1645

**Postal Address:** 44414 Pecan Court, Ste. 100, California, Md. 20619