PERSONNEL RECORDS AND SOCIAL SECURITY NUMBERS

Detailed records are kept concerning your employment with O'Neill Logistics. It is important that you keep your personnel records up to date.

It is your responsibility to notify the Human Resources Administrators of any changes to your name, address, telephone number, marital status, number of dependents and/or beneficiaries, or emergency contact. You should also advise the Human Resources Administrators if you continue your education or acquire additional skills.

Personnel files are the property of O'Neill Logistics. Access is limited to those with a need to know information in the file. Confidential information will be released to others only upon written request by the employee, where the Company is required to release such information, in defense of a claim against the Company, or as otherwise permitted or required by law.

The Company complies fully with New Jersey & California law with regard to the protection of Social Security numbers. Individuals employed by the Company may not:

- 1. Publicly post or publicly display an individual's Social Security number or any four or more consecutive numbers taken from the individual's Social Security number;
- 2. Print an individual's Social Security number on any materials that are mailed to the individual, unless State or Federal law requires the Social Security number to be on the document to be mailed;
- 3. Print an individual's Social Security number on any card required for the individual to access products or services provided by the person or public or private entity;
- 4. Require an individual to transmit his or her Social Security number over the Internet, unless the connection is secure or the Social Security number is encrypted; or

5. Require an individual to use his or her Social Security number to access an Internet website, unless a password or unique PIN or other authentication device is also required to access the Internet web site.

The Company may and does use or release a Social Security number, as required by or to comply with State or Federal law nor shall this subchapter obviate any prohibition on the use of Social Security numbers found in any Federal or State statutes and regulations.

The Company may also use a Social Security number for internal verification and administrative purposes, as long as the use does not require the release of the Social Security number to persons not designated by the Company to perform associated functions allowed or authorized by law.

Social Security numbers may be included in applications and forms sent by mail, including documents sent as part of an application or enrollment process or to establish, amend or terminate an account, contract or policy, or to confirm the accuracy of the Social Security number. A Social Security number that is permitted to be mailed under this subsection may not be printed, in whole or in part, on a postcard or other mailer not requiring an envelope, or visible on the envelope or without the envelope having been opened.

O'Neill Logistics collects personal information for employment purposes only. The personal data shared by you will not be sold or shared with entities other than those governmental and business entities that require it in relationship to your employment, e.g., the Internal Revenue Service, state agencies administering tax, labor and employment laws and benefits, and insurance companies providing benefit plans for the Company's employees.