

# Notice at Collection and Privacy Notice for California Job Applicants

Last updated: March 15, 2024

#### **Notice at Collection for California Job Applicants**

This **Notice at Collection** is provided pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the "CCPA"). It applies to job applicants that reside in California and provides details regarding the types of personal information that Corporate Technologies, LLC ("CorpTech," "we," or "us") collects during the job application process and how we use that information.

# • Identifiers and personal information, such as your name, email address, phone number, physical address, and other personal information included in your resume or other documentation uploaded through the job applicant form on our website or that you otherwise provided to us in connection with your application.

- \*\*None of the information described in this Notice at Collection is "sold" or "shared" (as those terms are defined by the CCPA).
- Professional or employment-related information: information regarding prior job experience, positions held, and dates of employment.
- Pre-hire information: job application, resume, background check results, pre-hire drug test results, job interview notes, and candidate evaluation records.
- Applicant-provided education information: information from resumes regarding educational history, and transcripts or records of degrees and vocational certifications obtained.

# The business purposes for which the above categories of personal information are collected and used.

- Considering job applicants for current and potential future employment opportunities and assess their skills, qualifications, and interests against our career opportunities.
- Evaluating job applicants' employment application, corroborating the information contained in the application and any supporting documents, and (where applicable) conducting employment related screening and background checks. (Please note, we only use background information as permitted by applicable law.)
- Scheduling job applicants for interviews and communicate with them about their application and employment opportunities.



|                                       | Complying with state and federal laws and regulations             |  |  |  |
|---------------------------------------|---|--|--|--|
|                                       | and maintaining records pursuant to such laws and regulations.    |  |  |  |
|                                       |   |  |  |  |
|                                       | <ul> <li>Communicating with job applicants about their</li> </ul> |  |  |  |
|                                       | candidacy.  |  |  |  |
|                                       | Keeping records of our interactions and                           |  |  |  |
|                                       | communications with job applicants.                               |  |  |  |
| The criteria used by CorpTech to      | CorpTech will retain the personal information it collects and     |  |  |  |
| determine the period of time such     | uses so long as it has a legitimate business need to do so, or    |  |  |  |
| personal information will be retained | as required by law (e.g., for tax, legal, accounting, or other    |  |  |  |
|                                       | purposes), whichever is the longer.                               |  |  |  |

To learn more about our online and offline practices in connection with the collection, processing, and disclosure of personal information relating to California job applicants, continue to read our Privacy Notice below.

# **Privacy Notice for California Job Applicants**

This **Privacy Notice for California Job Applicants** ("Privacy Notice") supplements the information contained in the Privacy Policy posted <u>on our website</u> and applies only to job applicants that reside in California ("consumers" under the CCPA). This Privacy Notice describes our online and offline practices with respect to the collection, processing, and disclosure of personal information relating to job applicants in California. Please read this Privacy Notice carefully so you understand our practices regarding your information.

#### **Information We Collect and Disclose**

As defined by the CCPA, "personal information" includes any 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 or household. Personal information does not include deidentified or aggregated consumer information, certain regulated information, or information made available to the general public.

In the past 12 months, CorpTech has collected the following categories of personal information from consumers acting as a job applicant of CorpTech and disclosed such information to the following categories of third parties for the business purposes described below.

| Categories of PI<br>Collected | Examples Categories of Third Parties to Whom Disclosed  |   |
|-------------------------------|---|---|
| Identifiers                   | Real name, alias, postal or mailing<br>address, email address, telephone<br>number, Social Security Number, driver's<br>license or state identification card number | <ul> <li>IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants</li> <li>Vendors that perform background checks and other Human Resources services</li> </ul> |



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|--|---|-----|--|
|  |   | •   | Professional advisors (accountants, lawyers, and auditors) Former employers and references of our job applicants   |
| listed in the<br>California                              | A name, signature, Social Security Number, physical characteristics or description, address, telephone number, driver's license or state identification card number, education, or employment information  Some personal information included in this category may overlap with other categories. | •   | IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants Vendors that perform background checks and other Human Resources services   |
| Internet or other<br>similar network<br>activity         | IP addresses, access logs, browsing history, search history, and usage history with respect to job applicant portals or systems   | •   | IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants   |
| Sensory data   | Audio recordings, voicemail, or similar information   | •   | IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants   |
| Legally protected classification characteristics         | Race, ethnicity, national origin, sex, gender, sexual orientation, gender identity, religion, age, disability, medical or mental condition, military status, familial status  |     | IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants Vendors that perform background checks and other Human Resources services  Professional advisors (accountants, lawyers, and auditors) |
| Professional or<br>employment-<br>related<br>information | Information regarding prior job<br>experience, positions held, names of prior<br>supervisors  |     | IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants Vendors that perform background checks and other Human Resources services   |
| Pre-Hire<br>Information                                  | Job application, resume, background check results, drug test results, job interview notes, and candidate evaluation records   |     | IT and cloud/hosting service providers, such as our email providers, business application providers, managed services providers and IT consultants Vendors that perform background checks and other Human Resources  |



|             |   |   | services                                |
|-------------|---|---|---|
| Consumer-   | Information from resumes regarding          | • | IT and cloud/hosting service providers, |
| Provided    | educational history; transcripts or records |   | such as our email providers, business   |
| Education   | of degrees and vocational certifications    |   | application providers, managed          |
| Information | obtained                                    |   | services providers and IT consultants   |
|             |   | • | Vendors that perform background         |
|             |   |   | checks and other Human Resources        |
|             |   |   | services                                |

CorpTech is an equal employment opportunity employer and does not discriminate against job applicants based on gender, race, race, color, creed, religion, sex, pregnancy, national origin, marital status, disability, age, sexual orientation, disability, genetic information or testing, HIV-positive status, veteran's status or military status, or any other status protected by applicable federal, state or local law.

From time to time, CorpTech may be required to disclose your information to governmental authorities for the purpose of complying with applicable laws and regulations or in response to legal process. We may also disclose your personal information to third parties in connection with the sale of our business or assets, or any merger or similar corporate matter, when your personal information is part of the assets involved in such transaction. Finally, we may "aggregate" or "deidentify" information from you pursuant to the CCPA, in which event the information is no longer "personal information."

#### **Collection of Personal Information**

CorpTech collects the above-identified categories of personal information from the following sources:

- <u>Direct collection:</u> We collect information directly from you when you choose to provide it to us by filling out forms, participating in an interview or other applicant process, or otherwise directly providing the information to us.
- <u>Third Parties:</u> We collect information about you from third parties who support our Human Resources and job application process, including recruitment agencies, background check vendors, and other hiring technologies. We may also collect information from your former employers or references contained in your job application.
- <u>Indirect and technology-based collection</u>: We also collect certain information from you indirectly when you access our websites or use our online job application form. CorpTech collects certain identifiers (such as IP addresses) and internet and similar network activity (such as website usage data) from you indirectly using cookie and similar technologies.

#### Business or Commercial Purposes for Collecting and Disclosing Personal Information

We use the personal information that we collect from job applicants for the following business or commercial purposes, consistent with and only as permitted by applicable law:

- Considering job applicants for current and potential future employment opportunities and assess their skills, qualifications, and interests against our career opportunities.
- Evaluating job applicants' employment application, corroborating the information contained in the application and any supporting documents, and (where applicable) conducting



employment related screening and background checks. (<u>Please note</u>, we only use background information as permitted by applicable law.)

- Scheduling job applicants for interviews and communicate with them about their application and employment opportunities.
- Complying with state and federal laws and regulations and maintaining records pursuant to such laws and regulations.
- Communicating with job applicants about their candidacy.
- Keeping records of our interactions and communications with job applicants.
- Protecting our operations, rights, privacy, safety or property, or that of our affiliates, job applicants, or other parties.
- For any other purposes that we disclose to you at the time of collection.

#### **Disclosure of Personal Information**

As indicated above, we may disclose some of your personal information to third-party vendors as necessary for our business purposes. For example, such vendors could include the agencies we use to conduct pre-employment screening (such as background checks and drug screening). From time to time, CorpTech may also be required to disclose your information to governmental authorities for the purpose of complying with applicable laws and regulations or in response to legal process.

## **Applicable Retention Periods**

For each category of personal information identified above, we will retain your personal information only for as long as necessary to fulfill your requests or the purposes for which it was obtained, as set forth in this Privacy Notice. The criteria used to determine our retention periods include (i) to fulfill the purpose for which the information was collected, (ii) for as long as we have an ongoing relationship with you, and (iii) as required by a legal obligation to which we are subject.

### **Sensitive Personal Information**

CorpTech does not collect "sensitive personal information" (as defined by the CCPA) for the purposes of inferring characteristics about California consumers. Accordingly, CorpTech treats such information as "personal information" consistent with applicable provisions of the CCPA.

#### Sale or Sharing of Personal Information

In the past 12 months, CorpTech has not "sold" any categories of personal information or "shared" any such information for the purposes of cross-context behavioral advertising (as those terms are defined by the CCPA). Likewise, CorpTech does not have actual knowledge of any sales or sharing of personal information regarding minors under 16 years of age.

### Your Rights Under the CCPA

Subject to exceptions, the CCPA provides California residents with the rights discussed below. For convenience, and as required by the CCPA, we explain how you can exercise those rights, to the extent they are applicable.



- 1. <u>Right to Know.</u> You have the right to request that we provide you certain information about our collection and use of your personal information during the past twelve (12) months (or longer, as permitted by the CCPA). Specifically, you may request that we disclose (in whole or part):
  - The categories of personal information we collected about you;
  - The categories of sources for the personal information we collected about you;
  - The business and commercial purposes for collecting (or selling or sharing, if applicable) your personal information;
  - The categories of third parties to whom we disclose (or sell or share, if applicable) your personal information;
  - The specific pieces of personal information we collected about you;
  - If we disclosed your personal information for a business purpose, the categories of personal information received by each category of third party; and
  - If applicable, the categories of personal information that we sold, and for each category, the categories of third parties whom such information was sold.

As noted above, you have the right to request that we provide copies of the specific pieces of personal information we collected about you. If a verifiable consumer request is made, and subject to any exceptions or limitations under the CCPA, we will take steps to deliver the personal information to you either by mail or electronically. If we provide the information to you electronically, it will be in a portable and readily useable format, to the extent technically feasible. Consistent with the CCPA and our interest in the security of your personal information, we will describe, but may not provide copies of, certain personal information we may receive about you (e.g., driver's license number, other government-issued identification number, financial account number, health or medical identification number, account password, or security questions or answers) in response to a CCPA request, to the extent any of those items are in our possession.

- 2. <u>Right to Request Deletion.</u> You have the right to request that we delete personal information we collected from you, subject to any exceptions or limitations under the CCPA.
- 3. <u>Right to Correct Inaccurate Information.</u> If we maintain inaccurate personal information about you, you have the right to request that we correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

Consumers in California also have the right to opt-out of (a) the sale of personal information, or (b) the sharing of their personal information for the purposes of cross-context behavioral advertising (as defined in the CCPA). California consumers also have the right to limit the use or disclosure of sensitive personal information by the business if such information is used or disclosed for certain purposes, as required by the CCPA. Because CorpTech does not engage in any of the foregoing activities, these rights are not available.

### **Exercising Your Rights**



To exercise the rights described above, you—or someone authorized to act on your behalf—must submit a verifiable consumer request to us by sending an e-mail to: privacy@gocorptech.com with the subject line: "CCPA Request" or calling us at 833-364-3708. Your request must include your name, email address, mailing address, phone number, the nature of your inquiry and the context in which we may have received your information. If you are an agent submitting a request on behalf of a consumer, we may request that you submit a signed permission from the consumer authorizing you to make the request. In order to protect the privacy and data security of consumers, the verifiable consumer request must: (i) Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative of such consumer; and (ii) Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

As indicated above, please be aware that the CCPA provides certain limitations and exceptions to the foregoing rights, which may result in us denying or limiting our response to your request. You may only make a verifiable consumer request to know twice within a 12-month period. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We may also request that you provide additional information if needed to verify your identity or authority to make the request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you or the consumer on whose behalf you are making the request.

### **Response Timing and Format**

The CCPA requires us to respond to a verifiable consumer request within forty-five (45) days of its receipt; however, we may extend that period by an additional 45 days. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response via email. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request, provided that you may request disclosure beyond the 12-month period as permitted by the CCPA. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For requests to know specific pieces of information collected about you, we will select the format of our response; the format will be readily useable and should allow you to transmit the information from one entity to another. We will not charge a fee to process or respond to a verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing the request.

#### **Our Commitment Not to Discriminate**

Consistent with the CCPA, we will not discriminate against you for exercising any of your CCPA rights by:

- Retaliating against you, as an employee or applicant, for exercising your rights.
- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.



- Providing you a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

# **Changes to this Privacy Notice**

We reserve the right to amend this Privacy Notice at our discretion and at any time. If there are changes to this Privacy Notice, we will post them here and update the "Last Updated" date at the top of this document. Continued use of this website after any changes is deemed to be acceptance of those changes. Please check this page periodically for updates.

#### **Contact Information**

Questions regarding this Privacy Notice, our use and disclosure your information, or the employment process should be directed to:

Phone: 612.465.0264

Email: Kristen.ohlsen@gocorptech.com

Corporate Technologies, LLC

**Attn: General Counsel** 

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