1. Applicability

This Privacy Notice for California Residents supplements the information contained in EAB’s Privacy Policy and applies solely to employees, job applicants and contractors who reside in the State of California (“you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (the “CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice.

2. Information That We Collect

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 and the California Confidentiality of Medical Information Act or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act (FIPA) and the Driver’s Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from our employees, contractors or job applicants (collectively, “consumers”) within the last twelve (12) months:

<table>
<thead>
<tr>
<th>Category</th>
<th>Data Collected</th>
<th>How Collected Data is Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifiers.</td>
<td>A real name, postal address, unique personal identifier, email address, Social Security number, driver’s license number, passport number.</td>
<td>Payroll, Taxes, Benefits Support</td>
</tr>
<tr>
<td>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</td>
<td>A name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, or health insurance information.</td>
<td>Payroll, Taxes, Benefits Support, Compliance Reporting</td>
</tr>
<tr>
<td>Protected classification characteristics under California or federal law.</td>
<td>Age, race, national origin, citizenship, marital status, physical or mental disability, sex, veteran or military status.</td>
<td>Payroll, Taxes, Benefits Support, Compliance Reporting, D&amp;I Analysis/Pay Equity</td>
</tr>
<tr>
<td>Internet or other similar network activity.</td>
<td>DNS logs.</td>
<td>Compliance with Information Security Policies</td>
</tr>
<tr>
<td>Professional or employment-related information.</td>
<td>Current or past job history or performance evaluations.</td>
<td>Business Support</td>
</tr>
</tbody>
</table>
### Inferences drawn from other personal information.

Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

### 3. How We Use the Personal Information That We Collect

In addition to the purposes set forth above, we may use or disclose the personal information we collect for one or more of the following purposes:

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To comply with legal or regulatory requirements and to respond to lawful requests, court orders, and legal processes.
- 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 bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users is among the assets transferred.

### 4. Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Professional or employment-related information.
- Non-public education information.
- Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.

**Sales of Personal Information**

In the preceding twelve (12) months, we have not sold personal information.

### 5. Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

**Access to Specific Information and Data Portability Rights**
You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

We do not provide these access and data portability rights for B2B personal information.

**Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer\(^1\) to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for B2B personal information.

**Exercising Access, Data Portability Rights and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable request to us by either:

**Toll-Free Phone Number:** (877) 613-6393

**Email:** privacy@eab.com

**Postal Address:**

\(^1\) Is consumer the right term here?
Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12)-month period. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include providing a government-issued ID for sensitive personal information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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.

Making a verifiable consumer request does not require you to create an account with us; however, we do consider requests made through your password-protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

**Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your 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 your request.

**6. Non-Discrimination**

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

**7. Other California Privacy Rights**
California Civil Code Section 1798.83 allows you to request information on how we disclose personal information to third parties for their direct marketing purposes during the immediately preceding calendar year. You may make one request each year by emailing us at privacy@eab.com or writing to us at the postal address detailed in Section 9 below.

8. 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 https://eab.com/privacy-policy-2/ and update the notice’s effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

9. Contact Us

If you have any questions or comments about this notice, the ways in which we collect and use your personal information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, you may contact us at:

Toll-Free Phone Number: (877) 613-6393

Email: privacy@eab.com

Postal Address:

EAB Global, Inc.
Attn: General Counsel
2445 M Street, NW
Washington, DC 20037

Last updated on December 30, 2019