



**EAB Global, Inc.
Job Applicant Privacy Notice**

Last Updated: January 1, 2023

EAB Global, Inc. and its subsidiaries (collectively, "Company") respect your concerns about privacy. This Job Applicant Privacy Notice ("Notice") describes the types of personal information we may collect about individuals who apply for jobs with Company ("Job Applicants"), online and offline. This Notice applies to the personal information Company obtains about Job Applicants and describes how we may use and disclose that information. It does not apply to information collected by any other app, website or service provided by Company.

Certain terms used in this Notice have the meanings given to them in the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and its implementing regulations (collectively, the "CCPA").

Personal Information We Collect

Company may collect (and may have collected during the 12-month period prior to the Last Updated date of this Notice) the following categories of personal information about Job Applicants:

Identifiers: identifiers, such as a real name, alias, postal address, unique personal identifier (e.g., a device identifier, employee number, unique pseudonym, or user alias/ID), telephone number, online identifier, Internet Protocol address, email address, account name, Social Security Number, driver's license number, passport number, date of birth, and other similar identifiers

Additional Data Subject to Cal. Civ. Code § 1798.80: signature and education information

Protected Classifications: characteristics of protected classifications under California or federal law, such as race, color, national or ethnic origin, age, sex, gender, disability, citizenship status, and military and veteran status

Online Activity: Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding Job Applicants' interactions with websites or applications

Sensory Information: audio, electronic, visual, thermal, olfactory and similar information

Professional or Employment Information: professional or employment-related information, such as compensation, benefits and payroll information (e.g., salary-related information, tax-related information, benefits elections and details regarding leaves of absence), information relating to Job Applicants' positions (e.g., job title and job description), performance-related information (e.g., evaluations and training certificates), talent management information (e.g., résumé information, occupation details, education details, certifications and professional association affiliations, historical compensation details, previous employment details, pre-employment screening details, and background check information, including criminal records information), and emergency contact information

Education Information: education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)

Inferences: inferences drawn from any of the information identified above to create a profile about you reflecting Job Applicants' preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How We May Use the Personal Information

We may use (and may have used during the 12-month period prior to the Last Updated date of this Notice) Job Applicants' personal information for the purpose of processing job applications, evaluating candidates for employment, and carrying out and supporting HR functions and activities, including as described below. We also include below relevant "business purposes" as they are described in the CCPA.

- A. Recruiting; processing job applications; performing background checks; determining suitability for employment; determining physical and/or mental fitness for work; reviewing and evaluating applications; determining salary and other forms of compensation; reimbursing expenses; making travel arrangements; securing immigration statuses; reviewing hiring decisions; providing access to facilities; managing our career opportunities; and managing our communications and relations with Job Applicants
- B. Ensuring business continuity; protecting the health and safety of our staff and others; safeguarding, monitoring, and maintaining our IT infrastructure, office equipment, facilities, and other property; providing technical support; detecting or preventing theft or fraud, or attempted theft or fraud
- C. Operating and managing our IT, communications systems and facilities, and monitoring the use of these resources; performing data analytics; improving our services; allocating and managing company assets and human resources; strategic planning; project management; compiling audit trails and other reporting tools; maintaining records relating to business activities, budgeting, and financial management; managing mergers, acquisitions, sales, reorganizations or disposals and integration with business partners
- D. Complying with legal requirements, such as tax, record-keeping and reporting obligations; conducting audits, management and resolution of health and safety matters; complying with requests from government or other public authorities; responding to legal process such as subpoenas and court orders; pursuing legal rights and remedies; defending litigation and managing complaints or claims; conducting investigations; and complying with internal policies and procedures
- E. Performing services, including: maintaining or servicing accounts; providing services to Job Applicants; verifying Job Applicants' information; providing analytics services; providing storage; or providing similar services
- F. Auditing, including auditing compliance
- G. Certain short-term, transient uses
- H. Helping to ensure security and integrity of our business resources
- I. Debugging to identify and repair errors that impair existing intended functionality
- J. Undertaking internal research for technological development and demonstration
- K. Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance such services or devices

Company does not use or disclose (and has not used or disclosed during the 12-month period prior to the Last Updated date of this Notice) "sensitive personal information" (as defined under the CCPA) for any purpose other than those expressly permitted under the CCPA.

To the extent Company processes deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

Retention of Personal Information

We retain personal information about Job Applicants for the time period reasonably necessary to achieve the purposes described in this Notice, or any other notice provided at the time of collection, unless a longer retention period is required or permitted by applicable law, taking into account applicable statutes

of limitation and our records retention requirements and policies.

Sources of Personal Information

During the 12-month period prior to the Last Updated date of this Notice, we may have obtained personal information about Job Applicants from the following categories of sources:

- Directly from Job Applicants;
- Job Applicants' devices;
- Our affiliates and subsidiaries;
- Service providers, contractors and other vendors who provide services on our behalf;
- Internet service providers ("ISPs");
- Operators systems and platforms;
- Government entities;
- Recruiting agencies;
- Social networks; and
- Data brokers, such as credit bureaus, credit reporting service providers, and background check services.

Disclosure of Personal Information

During the 12-month period prior to the Last Updated date of this Notice, we may have disclosed the following categories of personal information about Job Applicants for a business purpose to the following categories of third parties:

- **Identifiers:** Our affiliates and subsidiaries; vendors who provide services on our behalf; ISPs and operating systems and platforms; data brokers, such as credit bureaus, credit reporting service providers and background check services.
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** Our affiliates and subsidiaries; vendors who provide services on our behalf; data brokers, such as credit bureaus, credit reporting service providers and background check services.
- **Protected Classifications:** Our affiliates and subsidiaries; vendors who provide services on our behalf; data brokers, such as credit bureaus, credit reporting service providers and background check services.
- **Online Activity:** Our affiliates and subsidiaries; vendors who provide services on our behalf; ISPs and operating systems and platforms; data analytics providers; social networks.
- **Professional or Employment Information:** Our affiliates and subsidiaries; vendors who provide services on our behalf; data brokers, such as credit bureaus, credit reporting service providers and background check services.
- **Education Information:** Our affiliates and subsidiaries; vendors who provide services on our behalf; data brokers, such as credit bureaus, credit reporting service providers and background check services.
- **Inferences:** Our affiliates and subsidiaries; vendors who provide services on our behalf; ISPs and operating systems and platforms; data analytics providers; social networks.

In addition to the categories of third parties identified above, during the 12-month period prior to the Last Updated date of this Notice, we may have disclosed personal information about Job Applicants (i) at the direction of a Job Applicant; (ii) if we are required or permitted to do so by law or legal process, (iii) to law enforcement authorities or other government officials, (iv) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (v) in connection with an investigation of suspected or actual fraudulent or other illegal activity, and (vi) in the event we sell or transfer (or contemplate the sale or transfer of) all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution, or liquidation).

Company does not sell or share (for cross-context behavioral advertising purposes) personal information about Job Applicants. We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

California Privacy Rights

If you are a Job Applicant residing in California, you have certain choices regarding your personal information, as described below.

- **Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected about you, including the (i) categories of personal information; (ii) the categories of sources from which the personal information was collected; (iii) the business or commercial purposes for collecting, selling, or sharing (for cross-context behavioral advertising) the personal information; (iv) the categories of third parties to whom we disclosed your personal information; and (v) the specific pieces of personal information we have collected about you.
- **Deletion:** You have the right to request that we delete certain personal information we have collected from you.
- **Correction:** You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.

How to Submit a Request. To submit an access, deletion, or correction request, complete the form [here](#) or call (877) 613-6393. To submit a request as an authorized agent on behalf of an HR Covered individual, please complete the form [here](#).

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you request access to, or deletion or correction of, your personal information, to verify your identity, we will require additional information from you, such as your email address, postal address, phone number, or other details submitted in connection with your job application or résumé. In addition, if you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the Job Applicant whose personal information is the subject of the request. If you designate an authorized agent to make a request on your behalf, (1) we may require you to provide the authorized agent written permission to do so, and (2) for access, correction and deletion requests, we may require you to verify your own identity directly with us (as described above).

Additional Information. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

How We Protect Personal Information

We maintain administrative, technical and physical safeguards designed to protect personal information we collect about Job Applicants against accidental, unlawful or unauthorized destruction, interference, loss, alteration, access, disclosure or use.

Updates to this Privacy Notice

We may update this Notice from time to time and without prior notice to you to reflect changes in our personal information practices. We will indicate at the top of this Notice when it was most recently updated.

How To Contact Us

If you have any inquiries regarding this HR Privacy Notice or our privacy practices, please contact privacy@eab.com.