

PRIVACY POLICY AND NOTICE TO EMPLOYEES

CAREER STRATEGIES TEMPORARY, INC.

EFFECTIVE DATE: January 1, 2023

1. PURPOSE

Career Strategies Temporary, Inc., including its subsidiaries and affiliates (collectively, “CSI”, “we”, “us”, or “our”), is committed to ensuring the protection of Personal Information submitted to us in the employment and job application process. This California Residents’ Notice and Privacy Policy (“Notice” or “Policy”) describes what Personal Information we collect in the work-related context and what rights California Residents have regarding our collection and use of information.

The California Consumer Protection Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CCPA”), affords certain privacy rights to residents of the state regarding the use of their Personal Information. The law extends its protections to California residents in their roles as employees, independent contractors, and other work-related roles (“Covered Individuals”).

This Notice also provides Covered Individuals with information about their rights under California law. We may collect the categories of Personal Information identified in the Privacy Policy below in connection with the recruitment, placement, employment or other work-related activity involving Covered Individuals. We will not collect additional categories of Personal Information for Covered Individuals or use it for purposes beyond the scope of those identified below without obtaining consent.

2. INFORMATION WE COLLECT ABOUT CSI EMPLOYEES

CSI may collect the following personal information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly with you (“Personal Information”) for business purposes as part of your employment with CSI:

- (a) **Identifiers and demographic data.** This includes data such as title, full name, gender, age, contact details, such as current and prior home and work address, phone number(s), email address(es), your geographic preferences for the location of employment, driver’s license details, proof of eligibility to work and details of any work permit application, including biometric data.
- (b) **Sensitive data.** This includes data like financial account numbers, Social Security, Driver’s License, Passport or other governmental identification number, medical or health related information, biometric data, performance reviews, etc. collected for business purposes.
- (c) **Biometric information.** This includes information like ID badge photos or security camera video footage of you.

- (d) **Characteristics of protected classifications under California and Federal law.** This includes but is not limited to data such as citizenship, race, ethnic origin, or nationality.
- (e) **Geolocation data.** This can include location data we may collect as part of your use of a CSI issued device.
- (f) **Sensory data.** This is data which may or may not be related to you directly, as it is usually data coming from devices like security motion detectors or similar devices. However, if it is tied to other data, like key card access logs, it can become personal information.
- (g) **Professional or employment-related information.** This includes information such as work history, prior employer information, and professional certifications.
- (h) **Internet or other electronic network activity information.** Employee activity on CSI networks, systems and devices, including email to web browsing activity is collected and used. This includes log-in details, software application usage, VoIP phone usage, IP addresses and file share access.
- (i) **Non-public education information.** This is information related to your academic credentials such as what school you went to, what your GPA was, what activities or sports you did in school, or other data on your school transcripts.
- (j) **Inferences based on Personal Information.** This includes information in performance reviews, any testing you may have undertaken, information related to succession planning, as well as predictive analytics related to your use of IT systems and networks.

Personal Information does not include publicly available information, *i.e.*, information that is lawfully made available from federal, state, or local government records. Personal Information does not include information that is deidentified or aggregate consumer information.

3. WHERE WE GET YOUR PERSONAL INFORMATION

CSI obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase (if any).
- Indirectly from you. For example, from observing your actions as an Employee, from records of your use of CSI IT systems, or from location-tracking enabled devices connected to your application to CSI. CSI will monitor use of your workplace communications tools, (e.g. email account, mobile, or other devices accessing CSI's networks) in accordance with CSI's Employee Handbook and Related Policies.

- From independent third parties related to your eligibility for employment or our ongoing management of our business.
- Other CSI employees, as part of CSI's management, evaluation, training, and discipline processes.
- Other sources such as benefits providers, past employers, and recruitment agencies.

4. USE OF YOUR PERSONAL INFORMATION

CSI will process your Personal Information for the purposes listed below, primarily related to your employment, including:

- (a) Recruitment, including, verifying eligibility to work, obtaining professional and personal references and screening of educational and professional background data prior to and during the course of the interviewing process and employment, including carrying out criminal record checks (where permitted under applicable law).
- (b) Compliance with all relevant legal, regulatory and administrative obligations and responsibilities of CSI in relation to its role as your employer and in relation to your employment.
- (c) Personnel administration including maintaining contact information (and emergency contact information) for all staff, temporary workers, contractors, and interns.
- (d) The administration of salaries, wages, bonuses and benefits, the management and execution of occupational pension, life, disability and retirement insurance schemes (including for relevant dependents), management of stock option grants, and the reimbursement of expenses.
- (e) Management of employees, including performance reviews, time keeping, work scheduling, training and career planning, competency and professional qualifications, promotions and restructuring.
- (f) Monitoring employee compliance with CSI policies.
- (g) Management of access controls of premises and usage of the facilities of CSI.
- (h) Management of access to and usage of office equipment and resources including but not limited to telephones, mobile phones, laptops and portable devices and more generally the computer network and applications.
- (i) Maintaining the security of CSI's network and customer information and protecting the rights and property of CS
- (j) For a purpose described to you when collecting your Personal Information.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

5. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your Personal Information to a third party for a business purpose. A business purpose means the use of Personal Information for CSI's operational purposes or business needs that are reasonably necessary and proportionate to achieve the purpose for which information was collected. For purposes of workforce and job applicant information, examples of Business Purposes include, but are not limited to:

- (1) Selection and administration of the workforce;
- (2) Business operations, including payroll processing, human resources and benefits administration, and IT support services;
- (3) Ensuring the security, safety and protection of workers and resources;
- (4) Legal, regulatory and audit obligations;

When we disclose Personal Information for a business purpose, we enter into 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. These third parties are "Service Providers" and/or "Contractors" as defined by applicable law.

We may also disclose your Personal Information to another company as part of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets to that company; or where required by CSI policy, law, or in response to valid legal process compelling disclosure.

CSI has disclosed all of the categories of Personal Information as noted above, for the business purposes described above.

6. SELLING YOUR PERSONAL INFORMATION

CSI does not and will not sell your Personal Information.

7. RETENTION OF YOUR PERSONAL INFORMATION

CSI retains Personal Information about you for business purposes; this information is retained pursuant to our Records Retention Schedule. Our customary retention of personnel and job applicant information is a period of years after a hiring decision is made or after an

individual terminates or retires from employment, except when a legal obligation to preserve information exists.

8. CALIFORNIA RESIDENTS' PRIVACY RIGHTS

The following rights in this section apply solely to California residents, and do not apply to individuals living elsewhere. The following rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply. Any terms used in this notice and policy that are defined in the CCPA have the same meaning when used in this Policy.

Right to Access. You have the right to access Personal Information which we may collect or retain about you. If requested, we shall provide you with a copy of your Personal Information which we collect as permitted by the CCPA. You also have the right to receive your Personal Information in a structured and commonly used format so that it can be transferred to another entity (“data portability”).

Right to Know. You have the right to request that we disclose the following about your Personal Information, as defined by the CCPA:

- i. The specific Personal Information we may collect;
- ii. The categories of Personal Information we may collect;
- iii. The categories of sources from which we may collect your Personal Information;
- iv. The business purpose(s) for collecting or sharing your Personal Information;
- v. The categories of Personal Information we may disclose for business purposes; and
- vi. The categories of third parties to whom we may share your Personal Information.

Right to Opt-Out/Not Sell My Personal Information. CSI does not sell or share employee Personal Information within the meaning of the CCPA.

Right to Limit Sensitive Personal Information. CSI does not collect or processes Sensitive Personal Information for the purpose of inferring characteristics about its employees.

Right to Deletion. In certain circumstances, you have the right to request the erasure of your Personal Information, subject to several exceptions, including our legal obligations to maintain the information. Upon verifying the validity of a deletion request, we will delete your Personal Information from our records, and instruct any service providers or contractors to delete your information, when applicable.

Right to Correction/Rectification. In certain circumstances, you have the right to request correction of any inaccurate Personal Information.

Exercising Your Rights. If you are a California resident, you can exercise any of your rights as described in this Notice and under applicable privacy laws by using the contact information provided in this Notice. We will not discriminate against you for exercising such rights.

How to Submit a Request. To submit a request to know, delete or correct, you, or an authorized agent, may:

- Call us at this Toll-Free Number 888-822-2122; or
- Send an email to HR@csi4jobs.com

You should include your name, address, email address (if you want to receive our response via email) and a description of the request.

How We Verify Your Request. We will verify requests using a combination of individual identifiers to verify your identity. We will take additional efforts to verify the identification of an individual who requests that CSI disclose Personal Information about you in our response.

If we suspect fraudulent or malicious activity related to your request, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person about whom we have collected the Personal Information.

9. APPLICABILITY

This Policy supersedes all prior policies regarding this subject matter. We reserve the right to amend this Policy from time to time at CSI's discretion. You will be notified of any changes to these terms and we will update the Policy's effective date.

10. INQUIRIES

For any inquiries, questions or concerns you have about this Policy, please contact the human resources team at: HR@csi4jobs.com