

# PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS is applicable to the personal information collected by Psomas from or about California residents (“consumers”) who are applicants for employment, current employees, or former employees of Psomas (collectively “Employees”), to the extent such personal information is subject to the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Notice.

This notice informs employees of the categories of personal information we collect from them, the categories of sources of personal information collected, the business or commercial purposes for which the personal information will be used, and your rights and choices regarding any personal information collected.

## Categories of Personal Information 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 or device (“personal information”).

In particular, we may collect, and within the last twelve (12) months we may have collected, the following categories of personal information from the sources identified below in connection with an Employee’s employment application, employment consideration, employment, or termination of employment:

Category	Examples	Collected
<b>A.</b> Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
<b>B.</b> Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
<b>C.</b> Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, , marital status, , physical or mental disability, sex , veteran or military status,	YES
<b>D.</b> Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
<b>E.</b> Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO

Category	Examples	Collected
<b>F.</b> Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
<b>G.</b> Geolocation data.	Physical location or movements in company vehicles.	YES
<b>H.</b> Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
<b>I.</b> Professional or employment-related information.	Current or past job history or performance evaluations.	YES
<b>J.</b> Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records to the extent necessary for purposes of tuition reimbursement.	YES
<b>K.</b> Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- ▶ Publicly available information from government records.
- ▶ Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## Categories of Sources from which Personal Information was Collected

We may collect personal information from you, for example when you fill out an employment application with a contracted third party ( ex., ApplicantPro) or onboarding documents, or file a claim for benefits, or from former employers, placement firms or referees, or from your transactions with us. We also collect personal information from third parties as permitted by law, such as our service providers, background check providers, Employment Eligibility Verification Services (U.S. Citizenship and Immigration Services), certification or licensure governing bodies, and motor vehicle record providers.

## Business or Commercial Purpose for which Personal Information was Collected

The following are examples of the reasons for which we, or a contracted third party ( ex., ApplicantPro), may use your personal information, depending on whether you are an employment applicant, current employee, or former employee:

- ▶ Making a decision about your recruitment or employment;
- ▶ Determining the terms on which you work for us;
- ▶ Checking whether you are legally entitled to work;
- ▶ For the purpose of administering and maintaining Employee records;
- ▶ For the administering of your benefits;
- ▶ Paying you and, if you are an employee, deducting any applicable contributions;
- ▶ Managing sickness absence;
- ▶ Complying with employment and other laws and regulations, and health and safety obligations;
- ▶ Conducting performance reviews, managing performance, determining performance requirements, and making salary and compensation decisions;
- ▶ Compliance with security and other mandatory policies and building access;
- ▶ Contacting you in the event of a business disruption or continuity event;
- ▶ Equal opportunities monitoring and comply with obligations under laws and regulations applicable to us;
- ▶ Satisfying (or assisting you in satisfying) education, training and development requirements;
- ▶ Providing information to relevant external authorities for tax, social security and other purposes as legally required;
- ▶ Assessing qualifications for a particular job or task, including decision about promotions;
- ▶ Using internal and external training and promotional presentations and publications;
- ▶ Setting up and maintaining accounts and subscriptions with third parties that provide information or communication services;
- ▶ Making decisions about your continued employment;
- ▶ Gathering evidence for possible grievance or disciplinary hearings;
- ▶ Dealing with legal or regulatory disputes or investigations involving you, our work, or other employees or contractors, including accidents at work, potential and actual negligence claims and professional discipline matters;
- ▶ To prevent fraud;
- ▶ To monitor use of our information and communication systems to ensure compliance with our IT and document management policies;
- ▶ To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution;
- ▶ Business management and planning, including accounting, auditing, and insuring;
- ▶ Planning or reviewing options in relation to the operation or management of Psomas;
- ▶ Keeping registers required by law or regulation;
- ▶ To conduct data analytic studies to review and better understand employee retention and attrition rates;
- ▶ Providing requested references for future employers;
- ▶ Providing proof of employment;
- ▶ To administer claims for benefits including sickness absence or family related leaves, to comply with employment and other laws, to carry out obligations or exercise special rights in the field of employment and social security law;
- ▶ Communicating with you;
- ▶ Informing you of job opportunities and evaluating your suitability for a job;
- ▶ For other purposes as permitted by law.

## Categories of Third Parties whom the Personal Information is Shared

We may share personal information with third parties in connection with the performance of our services and business operations, as permitted or required by applicable law. For example, we work with third parties that provide services to us and partner with third parties to develop, operate, deliver, maintain, improve, enhance, and protect our services and in connection with other operations. Those parties can include by are not limited to:

- ▶ Website hosting or information technology consulting service providers;
- ▶ Data analysis service providers;
- ▶ Legal service providers;
- ▶ Accounting service providers;
- ▶ Administrative service providers;
- ▶ Security service providers;
- ▶ Application service providers;
- ▶ Benefits providers;
- ▶ Occupational health providers;
- ▶ Insurance providers;
- ▶ Travel service providers;
- ▶ Telecommunications and messaging services.

We may also disclose your personal information for other purposes permitted by law such as to:

- ▶ Comply with applicable laws;
- ▶ Respond to governmental inquiries or requests;
- ▶ Comply with valid legal or administrative processes.

***Psomas does not and will not sell any personal information to third parties.***

## Your Rights regarding Your Personal Information

### 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 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 or commercial purpose for collecting or selling 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.

### 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 consumer 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 providers to:

1. Complete the transaction for which we collected the personal information, provide a good or 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.

4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Exercising Access, Data Portability, and Deletion Rights

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

- ▶ Calling us at 213.223.1400, attention Caroline Yontez
- ▶ Emailing us at [cyontez@psomas.com](mailto:cyontez@psomas.com)

Only you or a person registered with the California Secretary of State that you authorize 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 12-month period. The verifiable consumer 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.
- ▶ 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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- ▶ Deny you goods or services.
- ▶ Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- ▶ Provide you a different level or quality of goods or services.
- ▶ Suggest 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 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 notify you by email or through a notice on our website homepage.

## Contact Information

If you have any questions or comments about this Notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 213.223.1400  
Website: [www.psomas.com](http://www.psomas.com)  
Email: [cyontez@psomas.com](mailto:cyontez@psomas.com)

Postal Address:  
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100 Corporate Pointe, Suite 265, Culver City, CA 90230