

# **CALIFORNIA CONSUMER NOTICE AT COLLECTION**

## **FOR CALIFORNIA RESIDENTS ONLY**

This notice at collection for California residents is adopted in compliance with the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CRPA”). Any terms defined in the CCPA have the same meaning when used in this notice.

### **Information We Collect**

Exact Staff (and any client company to which you will be assigned or considered for employment) (collectively referred to as “the Company”) collects and uses Personal Information for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance. Under the CCPA, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include publicly available information, lawfully obtained truthful information that is a matter of public concern, or consumer information that is deidentified or aggregate consumer information.

Below are the categories of Personal Information we collect and the purposes for which we intend to use this information:

- Identifiers, such as 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 identifier.
- Personal information categories described in the California Customer Records statute, which in addition to the identifiers above, include signatures, education, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- Characteristics of protected classifications under California or federal law.
- Commercial information, including records of personal property, products or services purchased, obtained, considered, or other purchasing or consuming histories or tendencies.
- Biometric information
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an internet website application, or advertisement.
- Geolocation data, such as the location of company-issued laptops, mobile phones, or device location.
- Audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information, such as work history, prior employer, human resources data, and data necessary for administering benefits and related administrative services.
- Education information, defined as 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).

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### Sensitive Personal Information.

The Company also collects “Sensitive Personal Information” for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance. Below are the categories of Sensitive Personal Information we collect and the purposes for which we intend to use this information:

- Personal Information that reveals a consumer’s social security, driver’s license, state identification card, or passport number.
- Personal Information that reveals a consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- Personal Information that reveals a consumer’s precise geolocation.
- Personal Information that reveals a consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership.
- Personal Information that reveals the contents of a consumer’s mail, email, and text messages in which the business is not the intended recipient of the communication.
- Personal Information that reveals a consumer’s genetic data.
- The processing of biometric information for the purpose of uniquely identifying a consumer.
- Personal Information collected and analyzed concerning a consumer’s health.
- Personal Information collected and analyzed concerning a consumer’s sex life or sexual orientation.

The Company collects Personal Information and Sensitive Personal Information to use or disclose as appropriate to:

- Comply with all applicable laws and regulations.
- Recruit and evaluate job applicants and candidates for employment.
- Conduct background checks.
- Manage your employment relationship with us, including for:
  - Onboarding processes;
  - Timekeeping, payroll, and expense report administration;
  - Employee benefits administration;
  - Employee training and development requirements;
  - The creation, maintenance, and security of your online employee account(s);
  - Reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
  - Workers’ compensation claims management;
  - Employee job performance, including goals and performance reviews, promotions, discipline, and termination;
  - Other human resources purposes;
- Manage and monitor employee access to company facilities, equipment, and systems.
- Conduct internal audits and workplace investigations.

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- x Investigate and enforce compliance with and the potential breaches of Company policies and procedures.
- x Engage in corporate transactions requiring review of employee records, such as evaluating potential mergers and acquisitions of the Company.
- x Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- x Perform workforce analytics, data analytics, and benchmarking.
- x Administer and maintain the Company's operations, including for safety purposes.
- x For client marketing purposes.
- x Exercise or defend the legal rights of the Company and its employees, affiliates, customers, contractors, and/or agents.

The Company will not sell<sup>1</sup> the Personal Information or Sensitive Personal Information that it collects. The Company will share<sup>2</sup> the Personal Information and Sensitive Personal Information that it

### Data Retention

The Company will not retain your Personal Information [and Sensitive Personal Information] for longer than is reasonably necessary to achieve the purpose for which the information was collected. In determining the retention period, the Company uses the following criteria: the time required to retain personal data to fulfill business purposes, including HR functions, services, and operational requirements; maintaining corresponding transaction and business records; handling possible queries or complaints and locating problems; and compliance with applicable laws, contracts, and other equivalencies regarding data retention.

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<sup>1</sup> "Sell" means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for monetary or other valuable consideration, unless a consumer uses or directs the business to intentionally disclose personal information or interact with one or more third parties.

<sup>2</sup> "Share" means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.

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For further information visit our Privacy Policy <https://exactstaff.com/documents/Exact-Staff-Online-Privacy-Policy-12-31-19.pdf>

If you have any questions about this notice or need to access this notice in an alternative format due to having a disability, please contact **CCPA@exactstaff.com**