

## Notice at Collection and Privacy Notice for California Residents

Neteffects, Inc. and its subsidiaries (collectively, “we,” “us,” or “our”) adopts this NOTICE AT COLLECTION AND PRIVACY NOTICE FOR CALIFORNIA RESIDENTS and applies to employees, contractors and job applicants who reside in the State of California (“applicant”, “consultant” or “you”). We adopt this notice to comply with 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.

### **Notice at Collection**

We may collect the following categories of personal information from you:

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Protected classification characteristics under California or federal law
- Professional or employment-related information.
- Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))

### **Information We Collect**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consultant, applicant, or device (“personal information”). In particular, we have collected the following categories of personal information from consultants or applicants within the last twelve (12) months:

| Category                                                                                                                                                                                                                                                       | Purposes Personal Information is Used                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| <b>Identifiers.</b> 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. | <ul style="list-style-type: none"><li>• Recruitment of Employees and Processing and Managing Job Applications</li><li>• Conducting Pre-Employment Screening and Background Checks</li><li>• Compensation and Expense Management</li><li>• Benefits Administration</li><li>• General Human Resources Management</li><li>• Training and Professional Development</li><li>• Internal Employment Purposes</li><li>• Compliance with Legal Requirements and Enforcement of Our Legal Rights</li></ul> |

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| <p><b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b> A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.</p> | <ul style="list-style-type: none"> <li>• Recruitment of Employees and Processing and Managing Job Applications</li> <li>• Conducting Pre-Employment Screening and Background Checks</li> <li>• Compensation and Expense Management</li> <li>• Benefits Administration</li> <li>• General Human Resources Management</li> <li>• Training and Professional Development</li> <li>• Internal Employment Purposes</li> <li>• Compliance with Legal Requirements and Enforcement of Our Legal Rights</li> </ul> |
| <p><b>Protected classification characteristics under California or federal law.</b> Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>                                                                                                                                          | <ul style="list-style-type: none"> <li>• Conducting Pre-Employment Screening and Background Checks</li> <li>• Benefits Administration</li> <li>• General Human Resources Management</li> <li>• Internal Employment Purposes</li> <li>• Compliance with Legal Requirements and Enforcement of Our Legal Rights</li> </ul>                                                                                                                                                                                  |
| <p><b>Professional or employment-related information.</b><br/>Current or past job history or performance evaluations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>• Recruitment of Employees and Processing and Managing Job Applications</li> <li>• Conducting Pre-Employment Screening and Background Checks</li> <li>• Compensation and Expense Management</li> <li>• General Human Resources Management</li> <li>• Training and Professional Development</li> <li>• Internal Employment Purposes</li> <li>• Compliance with Legal Requirements and Enforcement of Our Legal Rights</li> </ul>                                    |
| <p><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)).</b> 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.</p>                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• Recruitment of Employees and Processing and Managing Job Applications</li> <li>• Conducting Pre-Employment Screening and Background Checks</li> <li>• Compensation and Expense Management</li> <li>• General Human Resources Management</li> <li>• Training and Professional Development</li> <li>• Internal Employment Purposes</li> <li>• Compliance with Legal Requirements and Enforcement of Our Legal Rights</li> </ul>                                    |

Depending on our interactions with you, we may or may not have collected all the information listed above about you.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consultant or applicant information.
- 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.

We obtain the categories of personal information listed above from the following categories of sources:

- You, through information you disclose voluntarily.
- Prior employers, educational institutions, background check companies, drug screening and/or medical facilities, references, recruiters, job-related social media platforms
- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.
- From third parties and service providers in connection with the services we perform. For example, from sites where we post jobs ads and receive applications.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- **Recruitment of Employees and Processing and Managing Job Applications:** We use your personal information to process your job application, schedule and conduct interviews and communicate with you.
- **Conducting Pre-Employment Screening and Background Checks:** In accordance with applicable law, we use your personal information to conduct employment screening and background checks.
- **Compensation and Expense Management:** We use your personal information to conduct payroll processing, salary administration, expense reimbursement, and other compensation purposes such as determining bonuses, equity and other forms of employee compensation.
- **Benefits Administration:** We use your personal information we collect to administer benefits we provide, such as medical, dental, vision, disability insurance, retirement benefits and other employee benefit programs.
- **General Human Resources Management:** We use your personal information we collect to provide general HR management services, including managing employee on-boarding, termination and separation, travel administration and return-to-work screening (including any medical screening as required or permitted by applicable law).

- **Training and Professional Development:** We use your personal information to provide employment-related training, assisting with professional licensing and development.
- **Internal Employment Purposes:** We use your personal information to conduct internal investigations, resolve disputes, prevent or detect fraud or security incidents, conduct employee performance reviews, enforce our policies and code of conduct, protect the rights and safety of employees or others and manage whistleblower programs.
- **Compliance with Legal Requirements and Enforcement of Our Legal Rights:** We use your personal information to comply with applicable laws, regulations and legal processes (such as responding to subpoenas or court orders), and to respond to legal claims, resolve disputes, enforce our legal rights contained in employment or other contracts and comply with legal or regulatory recordkeeping requirements. Any other purposes authorized by the California Privacy Protection Agency, California or Federal law.

Depending on our interactions with you, we may or may not use or disclose all of the information identified above. 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.

#### **Sharing Personal Information**

We may disclose your personal information to a third party for business purposes. 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 may have disclosed the following categories of personal information for a business purpose:

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Protected classification characteristics under California or federal law
- Professional or employment-related information.
- Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))

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

- Affiliates and Subsidiaries
- Clients and/or Client Vendor Management Services Providers
- Service Providers and Professional Advisors
- Third parties to whom you or your agents authorize us to disclose your personal information

#### **Selling of Personal Data**

We do not sell your personal information, and in the preceding twelve (12) months, we have not sold any personal information.

### **Retention of Personal Data**

We will retain your personal data only for as long as is necessary for the purposes set out in this policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), our record keeping and audit obligations to our Clients, to resolve disputes, and enforce our legal agreements and policies.

### **Your Rights and Choices**

The CCPA provides consultants and applicants (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 12 months. Once we receive and confirm your verifiable consultant or applicant 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 of the business purpose, identifying the personal information categories that each category of recipient obtained.

#### ***Deletion and Correction Request Rights***

You have the right to request that we correct or delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consultant or applicant request, we will correct (and direct our service providers to correct) any objectively false information or delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We will make reasonable efforts to correct inaccurate information, however corrections will not be made to performance reviews, investigative findings, and other similarly subjective information.

We may deny your deletion request if retaining the information is necessary for us or our service providers 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.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
- Enable solely internal uses that are reasonably aligned with consultant or applicant expectations based on your relationship with us.
- Comply with a legal obligation.
- Comply with Client record keeping requirements.
- Comply with federal, state or local requirements and regulations.
- 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, correction, and deletion rights described above, please submit a verifiable consultant or applicant request to us at [hr@neteffects.com](mailto:hr@neteffects.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 consultant or applicant request related to your personal information. You may also make a verifiable consultant or applicant request on behalf of your minor child.

You may only make a verifiable consultant or applicant request for access or data portability twice within a 12-month period. The verifiable consultant or applicant 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. We will only use personal information provided in a verifiable consultant or applicant request to verify the requestor's identity or authority to make the request.

***Response Timing and Format***

We endeavor to respond to a verifiable consultant or applicant request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If we have an email address on file, we will deliver our written response to that email address. If we do not have an email address on file, 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 consultant or applicant 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 consultant or applicant 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.

**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 employment.
- Penalize or discipline consultant or applicants exercising their CCPA rights.
- Provide you a different level or quality of 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.

**Contact Information**

If you have any questions or comments about this notice, our Privacy Statement, 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: [hr@neteffects.com](mailto:hr@neteffects.com)