Privacy Notice for Residents of California

This Notice of Privacy is for California Residents and applies to all consumers who interact with EmploymentHub who reside in the State of California. It supplements the information in our <u>Privacy Policy</u> to comply with the California Consumer Privacy Act of 2018 (CCPA). Terminology defined in the CCPA is defined the same here. No provision of this Notice may be construed to provide consumers any rights (or our company any obligations) beyond those required by the CCPA and other applicable law.

Disabled consumers who need these disclosures presented in an alternate medium, may contact us at the email address or telephone number listed further below.

Personal Information That We Collect

We collect personal information directly from you and by observing your interactions on our website which identifies, relates to, describes and/or is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular consumer, household or device. In the last twelve months we have collected the categories of information listed below. 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. The following is an overview of information defined by the CCPA as personal information.

A. Unique personal identifiers	A real name, account name, address, alias, bank account number, credit card number, email address, debit card number, driver's license number, insurance policy number, internet Protocol address, passport number, physical characteristics or description, postal address, online identifier, signature, Social Security number, state identification card number, telephone number, unique personal identifier, or other similar identifiers.
B. Characteristics of protected classifications under California or federal law	Age (40 years or older), ancestry, citizenship, color, disability (physical or mental), marital status, medical condition, national origin, race, religion or creed, 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).
C. Commercial information	Products or services considered, obtained or purchased, purchasing or consuming histories or tendencies, records of personal property.
D. Biometric information	Activity patterns used to extract a template, behavioral, biological, genetic or physiological characteristics, other identifiers or identifying information eg:, face, finger or voiceprints, gait tendencies, health information like exercise or sleep information, iris or retina scans, keystrokes or other physical patterns.
E. Internet or other electronic network activity information	Browsing history, search history, information regarding interaction with advertisements, applications or websites.
F. Geolocation information	Physical location or movements including trends.
G. Sensory information	Audio, electronic, visual, thermal, olfactory or similar data.
H. Professional or employment related information	Past or present job history, performance evaluations.
I. Non-public / Private (non-public)	Class lists, disciplinary records, financial information, grades,

IISC Section 1232 a 34 C F P. Port	identification codes, schedules, transcripts or other information directly related to a student which is collected by educational institutions or agencies acting on their behalf.
J. Inferences or conclusions drawn from nersonal information	Profiles reflecting an individual's abilities, attitudes, aptitudes, behavior, characteristics, intelligence, predispositions, preferences, psychological trends etc.
K. Personal Information not governed by the CCPA	Deidentified or aggregated consumer information, information excluded from the CCPA's scope (eg: 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 (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994, publicly available information from government records.

We obtain personal information from the following categories of sources

- A. Client or their agents, directly or indirectly
- B. Government entities from which public records are obtained
- C. Third parties, advertising networks, consumer data resellers, data analytics providers, government entities, internet service providers, social networks, operating systems and platforms
- D. Website interactions from our contact us and other web forms.

How We Use Personal Information regulated by the CCPA

A. As described upon collection of information	As set forth in the CCPA.
B. Complying with the law	Obeying the court, law and government regulations, responding to requests from law enforcement and other governing bodies.
C. Fulfill requests, the reason you provided the information	Answering questions, facilitating delivery, fulfilling purchases, providing information on products or services, price quotes, processing payments and transactions, processing product orders, processing returns. This includes, for example, when you make a request online to receive offers via email or telephone, or when you request or agree during one of our phone calls, to be transferred to a third-party product or service seller to receive such offers.
D. Maintaining safety and security	Preventing theft of information, products and services as well as technological resources and preventing transactional fraud.
E. Personalizing the customer experience	Personalizing your experience to deliver content, product and service offerings relevant to your interests (eg; targeting offers and ads through our website, third-party sites and via email or text messaging –with your consent, where required by law).
F. Product development	Product, service and website improvement, research and analysis
G. Providing support	Developing and personalizing our products, services and website, investigating and addressing concerns, monitoring and improving responses
H. Restructuring	Evaluating or conducing mergers, divestures, reorganization, sale or transfer or assets

in the event of bankruptcy, liquidation, etc.

Sharing Personal Information

We may disclose your personal information to a third party (eg: Service providers and data aggregators) for a business purpose. When we disclose your information for business purposes our contracts state the purpose and requires all parties use personal information for the sole purpose of executing the contract and also that all personal information be kept confidential.

Personal Information Disclosures in the Last 12 Months

In the last twelve months, we have disclosed the categories of personal information below for a business purpose.

- A. Biometric information? No
- B. Characteristics of protected classifications under California or federal law? No
- C. Commercial information? Yes
- D. Geolocation information? Yes
- E. Inferences or conclusions drawn from personal information? Yes
- F. Internet or other electronic network activity information? Yes
- G. Non-public / Private (non-public) educational information protected by the Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))? No
- H. Professional or employment related information? Yes
- I. Sensory information? No
- J. Unique personal identifiers? Yes

Personal Information Disclosures in the Last 12 Months

In the last twelve months, EmploymentHub has sold the categories below of personal information for a business purpose. Note that under the CCPA, personal information is not considered "sold" if it is shared with the request of the consumer.

- A. Unique personal identifiers? No.
- B. Characteristics of protected classifications under California or federal law? No
- C. Commercial information? Yes
- D. Biometric information? No
- E. Internet or other electronic network activity information? No
- F. Geolocation information? No.
- G. Sensory information? No
- H. Professional or employment related information? No
- I. Non-public / Private (non-public) educational information protected by the Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))? No
- J. Inferences or conclusions drawn from personal information? No

Your Rights and Choices

The CCPA provides consumers with specific rights regarding their personal information if they are California residents. The following is an overview of these rights and an explanation of how to exercise them.

- 1. Specific Information Access and Data Portability Rights California residents have the right to request the disclose of what CCPA personal information we have collected about them in the last twelve months and what we have used it for during this time period. To the extent required by the CCPA, when we receive a verifiable consumer request, we will disclose the following information, after verifying your identity, if we can:
- A. Business or commercial purposes for collecting or selling personal information.
- B. Categories of personal information collected about you.
- C. Categories of sources we use to collect personal information about you.
- D. Categories of third parties we share your personal information with.
- E. Internet or other electronic network activity information collected or maintained.
- F. Personal information categories that each information recipient category disclosed to each recipient.
- G. Personal information categories that each information recipient category sold to each recipient.
- H. Specific pieces of personal information we collected about you, so that you can make a data request. We will provide you with this information in a portable format.
- I. Whether we disclosed or sold your personal information for a business purpose, two separate lists.
- **2. Deletion Request Rights** California residents have the right to request that we delete any of the CCPA personal information which we collected about them. After we have received and confirmed your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete your personal information and instruct our service providers to delete your information as well. We may not delete your information if it is required to us or our service providers to do the following:
- A. Completing the contract or transaction for which we collected the personal information, providing goods or services requested, taking reasonable actions within the scope of our ongoing business relationship with you.
- B. Complying with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.), and other legal obligations.
- C. Complying with free speech rights, engaging in free speech, ensuring consumers right to exercise their free speech.
- D. Complying with other laws.
- E. Finding and resolving defects or errors impacting intended product, service or website functionality.
- F. Internal processes in alignment with your relationship with us.
- G. Identifying security risks, protecting against deceptive, fraudulent, malicious, or illegal activity, or prosecuting individuals involved in such activities.
- H. Participating in public or peer-reviewed historical, scientific, or statistical research which is in the public interest and abides by ethics standards, if the information is required to complete the research and you have provided informed consent.
- **3. Exercising Access, Data Portability, and Deletion Rights** Only you or someone registered with the California Secretary of State who is authorized to act in your interests may make a request for information or deletion. Once you have made a verifiable consumer request, we will provide your personal information is a portable manner so that you can access it easily. Any information you provide will only be used to verify your identity. You can make a request following the instructions below:

confirm receipt within 15 days and then provide a written response within 45 days. If we require more time (up to 90 days), we will inform you in writing of the reason.

- B. Provide us with information necessary to verify your identity so that we may release the information to the individual to whom it belongs, or an authorized representative.
- C. You need not create an account to make requests, but if you have an account and login with us, signing in through our portal with a password serves to verify your identity.
- D. Provide enough detail in your request that we understand you, can evaluate the request and provide an answer.
- E. Select the format in which you would like to receive your personal information. This format should be readily accessible and allow you to transport the data to others without issue.
- F. We will provide access to your personal information for the last twelve-month period or provide an explanation as to who we cannot comply with the request.
- G. There is no fee to process your verifiable consumer request unless it is excessive. In with case we will inform you of the fee before proceeding.

You will need to prove your identity to us. If you have no password-protected account with us, you will need to provide us with at least 2 data points which we already maintain about you, and possibly other information and a signed declaration under penalty of perjury if the information maintained about you is of a sensitive nature. In some cases, we might not be able to successfully verify your information and in such a case, we will notify you as to why we cannot provide it.

- **4. Personal Information Sales Opt-Out and Opt-In Rights** California residents who are sixteen years of age or older have the right to dictate that we do not sell their personal information. If you opt-in to information sales, either verbally or in writing, you may opt-out at any time. Minors are not allowed to use our websites or services and we do not intentionally collect any personal information for or regarding those under the age of eighteen. To opt out please contact us at the following email address(memberservices@uniquecardservices.com) or by clicking here to opt-out.
- **5. Financial Incentives & Non-Discrimination Rights** To the extent required by the CCPA, we will not discriminate against individuals who choose to exercise any of their rights under the CCPA. Unless allowed by the CCPA, we will not:
- A. Deny you good or services because you exercised your rights.
- B. Charge different rates or prices, impost penalties or grant differential discounts for punitive purposes.
- C. Provide (or suggest) those who exercise their rights a different quality goods or a different level of service.
- D. We may, however, offer financial incentives to those who provide personal information which may result in variations in price, rates or quality depending on the value of the information provided.
- E. You must opt-in or provide prior written consent to participate in financial incentive programs and you may revoke this consent at any time.

We do not offer financial incentives to consumers to induce their agreement for us to sell their personal information. Rather, if you do not agree, we might not be allowed to provide your information to third parties who have the quotes, services or other information you have requested. Note that under the CCPA, the "sale" of information does not include the disclosure of information at the consumer's request.

Other California Privacy Rights:

California's "Shine the Light" law (Civil Code Section § 1798.83) provides California residents with the right to request information regarding our disclosure of personal information to third parties for their direct marketing

purposes. To make a request, please contact us at the following email address <u>memberservices@uniquecardservices.com</u> or <u>this webform</u>.

Changes to Our Privacy Notice

We reserve the right to amend this notice of privacy at any time and at our sole discretion. When changes are made, we will post a notice on the main website and the date the changes take effect. Continued use of this website indicates your acceptance of these changes.

Contact Information

If you have any questions, comments or queries about our privacy policy, how we collect or use personal information, your rights regarding such use, or how to exercise your rights please feel free to contact us at memberservices@uniquecardservices.com.

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