

## PRIVACY NOTICE TO CALIFORNIA JOB APPLICANTS

VectorUSA and/or any affiliated entities (collectively, the “**Company**” or “**we**”) provide this California Privacy Notice (“**Notice**”) to describe our privacy practices with respect to our collection of Personal Information as required under the California Consumer Privacy Act (“**CCPA**”). This Notice applies only to job applicants and candidates for employment who are residents of the State of California and from whom we collect “**Personal Information**” as defined in the CCPA.

### 1. Information We Collect from or About Job Applicants

We may collect Personal Information from you in a variety of different situations and using a variety of different methods, including, but not limited to, on our website, your mobile device, through email, in physical locations, through written applications, through the mail, and/or over the telephone. Generally, we may collect, receive, maintain, and use the following categories of Personal Information, depending on the particular purpose and to the extent permitted under applicable law:

CATEGORY	EXAMPLES	Retention Period
Personal Identifiers	Name, alias.	If hired, then name will be retained permanently, and the rest will be retained for duration of employment plus 10 years.  If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.
Contact Information	Home, postal or mailing address, email address, home phone number, cell phone number.	If hired, this data will be retained permanently.  If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.
Pre-Hire Information	Information provided in your job application or resume, information gathered as part of background screening and reference checks, pre-hire drug test results, information recorded in job interview notes by persons conducting job interviews for the Company, information contained in candidate evaluation records and assessments, information in work product samples you provided, and voluntary disclosures by you.	If hired, this data will be retained for duration of employment plus 10 years.  If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.
Employment History	Information regarding prior job experience, positions held, and when permitted by applicable law your salary history or expectations.	If hired, this data will be retained for duration of employment plus 10 years.

		If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.
Education Information	Information contained in your resume regarding educational history and information in transcripts or records of degrees and vocational certifications obtained.	If hired, this data will be retained for duration of employment plus 10 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.
EEO Information	Gender, racial or ethnic origin, disability, and veteran status information you voluntarily provide to us so that we can comply with Equal Employment Opportunity and/or affirmative action reporting obligations as a federal government contractor.	If hired, this data will be retained for duration of employment plus 6 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.
Inferences	Based on analysis of the personal information collected, we may develop inferences regarding job applicants' predispositions, behavior, attitudes, intelligence, abilities, and aptitudes for purposes of recruiting and hiring assessments and decisions.	If hired, this data will be retained for duration of employment plus 6 years. If <u>not</u> hired, it will be retained for 4 years from when position is filled or the date we receive your information, whichever is longer.

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information the Company may collect:

1. EEO Information (racial or ethnic origin)

Personal information *does not* include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the job applicant or from widely distributed media.
- Information made available by a person to whom the job applicant has disclosed the information if the job applicant has not restricted the information to a specific audience.
- De-identified or aggregated information.

## 2. How We Use Personal Information and Sensitive Personal Information

The Personal Information and Sensitive Personal Information we collect, and our use of Personal Information and Sensitive Personal Information, may vary depending on the circumstances. This Notice is intended to provide an

overall description of our collection and use of Personal Information and Sensitive Personal Information. Generally, we may use or disclose Personal Information and Sensitive Personal Information we collect from you or about you for one or more of the following purposes:

1. To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job with the Company, we will use that Personal Information in connection with your candidacy for employment.
2. To comply with local, state, and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, accident or safety records, and tax records).
3. To evaluate, make, and communicate decisions regarding your job application and candidacy for employment.
4. To obtain and verify background checks, references, and employment history.
5. To communicate with you regarding your candidacy for employment.
6. To comply with Office of Federal Contractor Compliance Program (OFCCP) requirements as a government contractor.
7. To engage in corporate transactions requiring review or disclosure of job applicant records subject to non-disclosure agreements, such as for evaluating potential mergers and acquisitions of the Company.
8. To evaluate, assess, and manage the Company's business relationship with vendors, service providers, and contractors that provide services to the Company related to recruiting or processing of data from or about job applicants.
9. To protect against malicious or illegal activity and prosecute those responsible.
10. To prevent identity theft.
11. To verify and respond to consumer requests from job applicants under applicable consumer privacy laws.

### **3. Retention of Personal Information**

We will retain each category of personal information in accordance with our established data retention schedule as indicated above. In deciding how long to retain each category of personal information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; applicable statutes of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

### **4. Sale/Sharing of Information to Third Parties**

The Company does **not** and will not sell your Personal Information or Sensitive Personal Information for any monetary or other valuable consideration. The Company does **not** and will not share your Personal Information or Sensitive Personal Information for cross-context behavioral advertising.

### **5. Access to Privacy Policy**

For more information, please review the Company's Privacy Policy at <https://www.vectorusa.com/terms-of-service-privacy-policy>