Employee and Applicant Privacy Notice

(CALIFORNIA ONLY)

This notice to California Residents pursuant to the California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA") supplements the information contained in our Website Privacy Policy and company Privacy policies, procedures, and standards, and applies solely to California residents who are job applicants, employees, or contractors ("you"). We are required to inform you about the categories of Personal Information and Sensitive Personal Information we collect or have collected in the past 12 months and the purposes for which we use this information. We adopt this Employee and Applicant Privacy Notice ("Notice") to comply with the CCPA, the CPRA, and other California privacy laws. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

Kelly Spicers is committed to protecting the privacy and security of the information we collect and to being transparent about the purposes for which we use your information. This Notice sets forth our policies and procedures for handling the information we collect and use in the employment context.

I. Categories of Personal Information and Sensitive Personal Information We Collect

When an individual applies to join our team or over the course of an individual's employment, we may collect the following categories of personal information and sensitive personal information. Sensitive personal information is a subset of personal information that requires greater security protections and standards of care in handling. Sensitive personal information is defined as information if lost, compromised, or disclosed could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. We collect and use this information only as permitted or required by, and in compliance with, law.

	Categories of Personal Information and Sensitive Personal Information Collected
Category A	Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers
Category B	Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history financial information, medical information and health information [1]
Category C	Characteristics of protected classifications under California or federal law,[2] such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and marital status
Category D	Commercial information, such as transaction information, purchase history and financial details
Category E	Biometric information, such as facial recognition and fingerprints

[1] This includes 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.

[2] This includes sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), age (40 and over), race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave.

Category F	Internet or network activity information, such as browsing history and interactions with our website, applications or systems
Category G	Geolocation data, such as device location
Category H	Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities;
Category I	Professional or employment-related information, such as work history and prior employer, human resources data and data necessary for benefits and related administrative services
Category J	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records
Category K	Inferences drawn from any of the Personal Information listed above to create a profile or summary above, for example, an individual's preferences, abilities, aptitudes, and characteristics

II. Purposes for Which Personal Information and Sensitive Personal Information Is Used
We process your personal information for the following business purposes:

- *Determining your eligibility for a position with Kelly Spicers*, including processing your application, assessing your fit with us or for a specific role, conducting interviews, carrying out background and reference checks in accordance with law, and keeping records related to our hiring process;
- *Managing compensation, benefits, and employment-related expenses*, including payroll processing, managing salaries and expenses, managing corporate credit cards and expense reimbursements, as well as administering equity, compensation, bonus, and insurance programs;
- *Managing professional development, performance, and conduct*, including responding to complaints of misconduct, managing conflicts of interest, conducting performance appraisals, supporting career development, and managing whistleblower programs;
- *Protecting the company against illegal activity and other misconduct*, including by detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- *Undertaking activities to verify and maintain the quality, safety, and performance of our products and services*, including product and service testing, research, and development;
- *Complying with our legal obligations*, including those related to tax and anti-discrimination laws; and
- *Other routine business purposes*.

III. How We Share Personal Information and Sensitive Personal Information
Kelly Spicers may disclose your Personal Information and Sensitive Personal Information to a third party for a business purpose, including to our service providers. When we disclose personal information or sensitive 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. We share your Personal Information with the following categories of third parties:

- Service providers.
- Third parties with whom you direct us to share your Personal Information.
- Other third parties such as consumer reporting agencies when we perform employee background screenings.

In the preceding twelve (12) months, we have not sold any personal information or sensitive personal information.

IV. Your Rights and Choices

The CCPA and CPRA provides you with specific rights regarding their personal information. This section describes your CCPA and CPRA rights and explains how to exercise those rights.

Right to Access

You have the right to access personal and sensitive personal information which we may collect or retain about you. If requested, we will provide you with a copy of your information which we collect as permitted by the CCPA and CPRA.

You also have the right to receive your personal and/or sensitive personal information in a structured and commonly used format so that it can be transferred to another entity ("data portability").

Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal and sensitive information unless responding to the request is impossible or involves disproportionate effort. Once we receive and confirm your verifiable request, we will disclose to you:

- The categories of personal information and sensitive information we collected about you.
- The categories of sources for the personal and sensitive information we collected about you.
- Our business or commercial purpose for collecting, using and/or disclosing that information.
- The categories of third parties, contractors and service providers with whom we share or disclose that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose, a list of those disclosures, identifying the personal information categories that each category recipient obtained.
- Whether your information is sold or shared.
- The retention period or criteria used for retention.

Right to Opt-Out/Do Not Sell My Personal Information

Kelly Spicers does not sell personal information within the meaning of the CCPA and CPRA.

Do Not Share or Disclose My Sensitive Personal Information

You have the right to limit how your sensitive personal information is disclosed or shared with third parties, as defined in the CCPA and CPRA.

Right to Deletion

In certain circumstances, you have the right to request the deletion of your personal and sensitive personal information. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

Please note that we may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- 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.
- Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another to exercise their free speech rights, or exercise another right provided for by law.
- 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.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the company.
- Comply with a legal obligation.

Right to Correct/Right to Rectification

In certain circumstances, you have the right to request correction of any inaccurate personal and sensitive personal information. Once we receive and confirm your verifiable request, we will use reasonable efforts to correct your information as directed, taking into account the nature of the personal information or sensitive personal information and the purposes of maintaining your information.

Exercising Your Rights

You can exercise any of your rights as described in this Notice and under applicable privacy laws by using the contact information provided in this Notice. You can exercise your rights without fear of retribution or discrimination.

If you would like to exercise any of your rights, please complete and submit a request form which can be found on the following link: http://improperconduct.kellyspicers.com/. Please include your contact information so that we can confirm your identity. As an alternative, you can call our toll-free hotline at 1 (800) 774-2377. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your personal information.

You may only make a verifiable request to access or data portability twice within a 12-month period. The verifiable request must:

- Provide enough 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 also use personal information provided in a verifiable request to confirm the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electrically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable 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, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable 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 computing your request.

V. Data Storage and Security

We use a reasonable standard of care to store and protect your personal information and sensitive personal information. We use appropriate physical, technical and organizational security measures and procedures to protect personal information from unauthorized use, loss, alteration, destruction or modification. Kelly Spicers will retain your personal information until the initial purpose for collecting and retaining such data has been satisfied.

We also use a reasonable standard of care to store and protect from disclosure any personal information and sensitive personal information collected using the principles of least-privileged access and by limiting access to personal information and sensitive personal information to individuals with a 'need to know'.

VI. Contact Information & Updates

This Notice is reviewed and updated annually to ensure it accurately captures our practices and procedures and in which case the revised Notice will be posted to our intranet or provided to you in writing, by email, or mail. For information about our Private Policy, go onto the following link: Privacy Policy.

If you have any questions or comments about this Notice and the ways in which Kelly Spicers collects and uses your information as described above, please do not hesitate to contact the HR Department at HR@KellySpicers.com.