

# CORPS SOLUTIONS

## Corps Solutions CCPA Employee and Applicant Privacy Notice

**Effective Date:** January 1, 2020; Revised June 1, 2021

Under the California Consumer Privacy Act of 2018 (“CCPA”), Corps Solutions, the company you are applying to work for (hereinafter, “we”, “our”, or “us”) may collect personal information and use it for certain business purposes as described below in this CCPA Employee and Applicant Privacy Notice.

We are required to disclose the following information to California “consumers” regarding our collection of their personal information. Under the CCPA, “consumers” means California residents, including job applicants, employees or contractors of a business.

### Information We Collect

We may collect Personal Information from California job applicants, employees, or contractors from a variety of different sources, including, but not limited to on the Corps Solutions Enterprise Network, our website, your mobile device, through email, in physical locations, through the mail, and/or over the telephone. More specifically, Corps Solutions may collect the following categories of Personal Information:

<b>Category</b>	<b>Examples of Personal Information that May Be Collected</b>	<b>Collected</b>
A. Identifiers.	A real name, Internet Protocol address, email address, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	YES
C. Protected classification characteristics under California or federal law.	Age, race, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a	NO

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	template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, or abilities.	No

Personal information does not include:

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

Corps Solutions obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from documents or forms that you may provide to us related to the job in which you are applying or hired for or participating in Corps Solutions' health or retirement benefit programs.
- Indirectly from you. For example, from observing your actions on our website or from information your computer or mobile device transmits when interacting with the Corps Solutions Enterprise Network, our website or mobile applications, among other things.
- Directly and indirectly from your activity from your electronic activity. For example, on our website, on the Corps Solutions Enterprise Network or your use of an online application or business system, such as e-mail, provided by Corps Solutions.
- Third parties, that provide services to us in connection with our business operations. For example, a referral or recruiter who submits your information to us for an employment position that may interest to you or consumer reporting agencies for employment background checks or security clearance validation.

## How We Use Personal Information

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We may use or disclose the Personal Information we collect from you or about you to do one or more of the following:

- To fulfill or meet the purpose for which you provided the information. For example, if you share your personal information to apply for a job, we will use that personal information to assess qualifications for a job and determine eligibility for employment.
- To contact you and to inform you about benefits or information relating to your employment or potential employment.
- To administer all aspects of the Company's employment practices, including recruiting, hiring, discipline, termination, promotions, transfers, compensation, benefits, training, leaves of absence, and other terms and conditions of employment.
- To provide, support, personalize, and develop our website and services relating to your employment or potential employment.
- To create, maintain, customize, and secure your information or account with us.
- To process your requests or transactions and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our systems, app or website, services, databases and other technology assets, and business.
- For research, analysis, and business development, including to develop and improve our business processes, website, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To complying with applicable federal, state, or local laws or employment statutes;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA or subsequently agreed to by you.
- For all other purposes that are reasonably required by Corps Solutions.

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.

## **How We Share Personal Information**

Corps Solutions may disclose and share your personal information with the following categories of third parties for a business purpose:

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- Service providers.
- Third parties with whom you direct us to share your personal information.
- Third parties as part of our employment process such as consumer reporting agencies for employment background checks.

In the preceding twelve (12) months, Corps Solutions has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
- Category C: Protected classification characteristics under California or federal law.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category H: Sensory data.
- Category I: Professional or employment-related information.

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.

We do not and will not sell your personal information. So, we do not offer an opt-out to the sale of personal information.

## **Data Security**

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal information against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal information to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

## **Data Retention**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

If you are offered and accept employment with Corps Solutions, the personal information we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal information policies. If you do not become an employee, or, once you are no longer an

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employee of Corps Solutions, we will retain and securely destroy your personal information in accordance with our document retention policy and applicable laws and regulations.

## **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. We do not disclose your Personal Information to third parties for their direct marketing purposes.

## **Changes to Our CCPA Employee and Applicant Privacy Notice**

Corps Solutions reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website and update the notice's Effective Date above.

## **Contact Information**

If you have any questions or comments about this notice, the ways in which Corps Solutions collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 1-540-300-1274

Email: [info@corps-solutions.com](mailto:info@corps-solutions.com)

Mailing Address:

Corps Solutions

ATTN: Human Resources

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