

# CORPS SOLUTIONS

## Corps Solutions California Employee and Applicant Privacy Notice

**Effective Date:** January 1, 2023

Under data privacy and protection laws and regulations affecting residents of the State of California (“**California Privacy Laws**”), Corps Solutions, LLC (hereinafter, “**we**”, “**our**”, “**us**”, or “**the Company**”), may collect personal information and use it for certain HR-related business purposes as described below in this California Employee and Applicant Privacy Notice (“**HR Privacy Notice**”).

We are required to disclose the following information regarding our collection of Personal Information of California consumers who are current and former employees, dependents and beneficiaries of a current or former employee, officers, temporary workers, in addition to independent contractors engaged by us, and current and potential job applicants (“**Employees**”, “**you**” or “**your**”). However, information provided in this HR Privacy Notice may apply to our Employees residing in other U.S. states. For the purposes of this HR Privacy Notice, “**consumers**” means California residents as defined under the California Privacy Laws.

### Definitions

The term “**Personal Information**” means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual as defined under applicable data privacy laws. Personal Information expressly excludes anonymized data that is de-identified and/or aggregated in accordance with applicable data privacy laws or regulations.

The term “**Sensitive Personal Information**” means Personal Information of children, or Personal Information that reveals information about a living individual’s physical or mental health, racial or ethnic origin, political or religious views, trade union membership, sexual orientation, genetic information, biometric information, commission or alleged commission of crime or related proceedings, and, in some jurisdictions, financial information.

### Information We Collect

We collect Personal Information in order to manage and support our relationship with you. We may collect the following categories of Personal Information:

Category	Examples of Personal Information that May Be Collected	Collected
A. Identifiers.	A real name, Internet Protocol address, email address, national identifiers, including your national ID/passport, immigration status and documentation, visas, social security numbers (for US only), driver’s license number, or other similar identifiers.  • We collect this category of information from you; your devices; third parties, including social media; previous employers; references; and public databases.	YES
B. Personal information	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport	YES

# CORPS SOLUTIONS

Category	Examples of Personal Information that May Be Collected	Collected
categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>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 (see Cal. Civ. Code § 1798.80(e)).</p> <ul style="list-style-type: none"> <li>We collect this category of information from you, your devices, or other third parties, such as our service provider or business partners. Some Personal Information included in this category may overlap with other categories.</li> </ul>	
C. Protected classification characteristics under California or federal law.	<p>Characteristics of protected classifications under California or federal law, i.e., 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>We collect this category of information from you when you choose to provide it to us or as required under our HR-related business purposes. We may also collect this information indirectly from other parties, such as our service providers and business partners as part of assessments, surveys, or data collection of work-related activities.</li> </ul>	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 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.	NO
F. Internet or other similar electronic network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement, which may include your username, password and other identifiers that you may set to access our network or any password protected sites, applications, and other services we offer to our Employees, IP addresses, log files, login information, and software and hardware	YES

# CORPS SOLUTIONS

Category	Examples of Personal Information that May Be Collected	Collected
	<p>inventories (for further information about how we process IT information, see “<b>Employee Monitoring</b>” section below applicable to our W-2 employees, officers or contractors).</p> <ul style="list-style-type: none"> <li>We collect this category of information from you, your devices, and third-party activity logs.</li> </ul>	
G. Geolocation data.	<p>Physical location or movements.</p> <ul style="list-style-type: none"> <li>We collect this category of information directly from you and your devices, including through GPS location, on-premises security surveillance, and facility key-card access.</li> </ul>	YES
H. Sensory data.	<p>Audio, electronic, visual, thermal, olfactory, or similar information, which may include your photo for company directory or work-related social events.</p> <ul style="list-style-type: none"> <li>We collect this category of information directly from you and your devices through audio recordings of customer service calls; audio/video recordings of in-person and virtual meetings, presentations, and events; and internet and electronic network activity described above.</li> </ul>	YES
I. Professional or employment-related information.	<p>Current or past job history or performance evaluations, which may include your professional qualifications, publicly available information relating to your education, CV/résumé, reference letters and interview notes, criminal records data (for background check purposes, where permissible and in accordance with applicable laws). Some Personal Information included in this category may overlap with other categories.</p> <ul style="list-style-type: none"> <li>We collect this category of information directly from you in your capacity as an onsite visitor to our facilities, as business contacts at trade shows and similar events, as employee and customer surveys and questionnaires, and for event registration purposes.</li> </ul>	YES
J. Non-public education information.	<p>Education information, including the name or address of a student or family members, student number, date or place of birth, mother’s maiden name, handwriting, or other information that could identify a student with reasonable certainty (see 34 C.F.R. 99.3 (definitions of “personally identifiable information” and “biometric record”) and records directly related to a student</p>	YES

# CORPS SOLUTIONS

Category	Examples of Personal Information that May Be Collected	Collected
	<p>maintained by an educational agency/institution, 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>We collect this category of information directly from you, your contacts who provide references, and third parties such as schools, financial institutions, and public databases.</li> </ul>	
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	NO
L. Sensitive Personal Information	<ul style="list-style-type: none"> <li>Social Security Number, Driver's License Number, State ID or Passport Number</li> <li>Account log-in, financial account, password, or credentials allowing access to an account</li> <li>Racial or ethnic origin, religious or philosophical belief, or union membership</li> <li>Contents of Consumer's email, and text messages between the Company and individual Consumers</li> <li>Health Data</li> </ul> <p>This category of information is collected directly from you and /or your devices, or indirectly from other parties, such as our service providers or business partners, or your family members who are our employees (with respect to employment benefits).</p> <p>We may also collect some of these categories of information from you in your capacity as an Employee for legitimate employment-related business purposes.</p> <p>We only collect Sensitive Personal Information for legitimate business purposes appropriate for the use and disclosure of Sensitive Personal Information as defined in the California Privacy Laws, and not otherwise use it to infer characteristics about you.</p>	YES

# CORPS SOLUTIONS

---

In accordance with the California Privacy Laws, Personal information does not include:

- Publicly available information from government records or lawfully obtained, truthful information that is a matter of public concern; or
- 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.

If we ask you to provide any other categories of Personal Information not described above, then we will endeavor to notify, or communicate our request to, you at the point we collect the Personal Information that we will ask you to provide, and the reasons why we ask you to provide it.

## **How We Use Personal Information**

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

- To fulfill or meet the purpose for which you provided the information. For example, if you share your Personal Information to apply for an opening with us, 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, which include auditing related to counting ad impressions to unique visitors, verifying positioning and quality of advertisement impressions, and auditing compliance with this specification and other standards.
- To create, maintain, customize, and secure your information or account with us.
- To process your requests or transactions and prevent transactional fraud.

# CORPS SOLUTIONS

---

- 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, software or smart-device applications 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 comply with applicable federal, state, or local laws or employment-related statutes.
- As described to you when collecting your Personal Information, as otherwise set forth in California Privacy Laws, or subsequently agreed to by you.
- To maintain emergency contact and beneficiary details.
- To compile internal directories, such as employee directories (excluding job applicant's Personal Information).
- To prevent and detect fraud or other types of wrongdoing.
- To fulfill other legitimate purposes reasonably required for day-to-day operations, such as accounting, financial reporting, and business planning.
- To book authorized travels for you or coordinate your attendance of job-related, professional, or employer-sponsored events.
- For all other purposes that are reasonably required by Corps Solutions, that qualify as "business purposes" as defined under the California Privacy Laws, including:
  - (i) Evaluation, performance, or implementation of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.
  - (ii) As permitted by applicable laws, create de-identified or aggregated dataset based on your Personal Information.

## How We Disclose or Transfer Personal Information

In the preceding 12 months, Corps Solutions may disclose your Personal Information in Categories A-C, F-J and L provide in the Table above with the following categories of third parties for a business purpose:

- Majority-owned or controlled affiliates.
- Service providers, such as web hosting, information technology, customer services, cloud services, data analytics, and HR recruitment-related promotional or advertising activities.
- 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.
- With our insurers, and other professional advisers (including bankers, lawyers, accountants) that need access to your information to provide operational or other support on our behalf.

# CORPS SOLUTIONS

---

We may ask, from time to time, if you would like us to share your information with other unaffiliated third parties, who are not described elsewhere in this HR Privacy Notice. We will only disclose your information in this context with your consent.

When we disclose personal information for a business purpose, we enter into a contract or agreement 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 or share your Personal Information. As such, we do not offer an opt-out to the sale of Personal Information because it is not applicable.

## **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 this Privacy Notice or other related policies. If you do not become an employee, or, once you are no longer an 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.

## **Your California Privacy Rights**

### **1. Right of Access to Specific Information and Data Portability Rights:**

- As a resident of the State of California, you have the right to request that we disclose certain information to you regarding our collection, use, and disclosure of your California Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:
  - The categories of California Personal Information we collected about you;
  - The categories of sources for the California Personal Information we collected about you;
  - Our business or commercial purpose for collecting or disclosing that California Personal Information;
  - The categories of third parties with whom we disclose that California Personal Information;
  - The specific pieces of California Personal Information we collected about you in a format easily understandable to the average consumer (also called a data portability request); and
- In addition, to the extent a business sells or shares California Personal Information\*\*, a consumer shall have the right to request the business to identify, during the past 12 months:



# CORPS SOLUTIONS

---

- The categories of California Personal Information that the business sold or shared, and the categories of third-party recipients and
- The categories of California Personal Information disclosed for a business purpose and the categories of recipients

\*\* While the sale or sharing of California Personal Information as defined under the California privacy laws is not applicable to how we collect or use your Personal Information, we provide this information as this is a core part of your rights as a California consumer.

## 2. Right to Deletion

- You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions and as permitted under the California Privacy Laws. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

## 3. Right to Opt-out of “Sale” and Certain “Sharing” Practices

- A consumer has the right to opt-out of certain data sharing practices with third parties, who may use your California Personal Information solely for their own purposes. The right to opt-out is limited to Personal Information we “sell” or “share” to these third parties. “Sell” in this case does not mean providing data in exchange for money – we don’t do that. “Sell” or “sharing” instead means the disclosure or release of Personal Information, including technical device data that does not identify a consumer directly but can be attributed back to identify the consumer, when a third party might use that data for its own purposes, such as for personalized advertising or cross-context behavioral advertising, whether or not for monetary or other valuable consideration. To the extent applicable, a consumer may opt out by using the “Contact Information” as described below. While this consumer right is not applicable to how we collect or use your California Personal Information, we provide this information as this is a core part of your rights as a California consumer.

## 4. Right to Correct.

- You have the right to correct inaccurate Personal Information. Our goal is to keep your Personal Information accurate, current, and complete. If you believe your Personal Information is not accurate (other than the one listed on your account, which you may modify at any time), you may submit a request by using the “Contact Us” section of this HR Privacy Notice.

## 5. Right to Limit Use and Disclosure of Sensitive Personal Information.

- Effective January 1, 2023, where we collect “sensitive personal information” as defined under California Privacy Laws and illustrated in Category L in the table above, a consumer has a right to limit the use of sensitive personal information **unless** our use of sensitive personal information is reasonably necessary to perform services or provide goods reasonably expected by an average consumer. While this consumer right is not applicable to how we collect or use your Sensitive Personal Information, we provide this information as this is a core part of your rights as a California consumer.



# CORPS SOLUTIONS

---

## 6. Right to Non-Discrimination

- We will not discriminate against you for exercising any of your California Privacy rights. Unless permitted by California Privacy Laws, we will not:
  - Deny you goods or services;
  - Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
  - Provide you a different level or quality of goods or services; or
  - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## Data Security

We recognize the importance of safeguarding your Personal Information and we endeavor to maintain 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.

When we engage third parties to perform services on our behalf, we require them to observe the intent of this HR Privacy Notice. No method of data transmission or storage is 100% secure, so we cannot guarantee the security of your Personal Information. However, the safety and security of your Personal Information also depends upon you. Where you use a password for access to secure parts of our networks, systems, HR-related platforms or related services, you are responsible for keeping your password confidential and activate other security measures made available. Do not share your password with anyone.

## 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.

## Employee Monitoring

With respect to our Employees (other than job applicants), we may physically and electronically monitor its offices, and use of our IT and communications systems, for specific, lawful purposes. Where permitted by applicable law, we may monitor or record activities that involve Employee (other than job applicants)'s Personal Information. For example, we may monitor your activity and presence in our offices with badge readers, sign-in sheets, and/or surveillance cameras. We generally do these things to prevent unauthorized access to our offices and to protect Employees (other than job applicants), authorized visitors, and our property. We may also monitor or record activity on our IT and communications systems and network, such as internet traffic, website filtering, email communications or systems accessed. Additional information relating to our employee monitoring policy is available via our employee intranet.

# CORPS SOLUTIONS

---

Where permitted by law, we may also carry out monitoring for other purposes such as:

- Validation of business transactions and archiving;
- Training and evaluation of employees;
- Protection of confidential information, intellectual property and other business interests;
- Investigation of breaches of our policies and procedures, or other unlawful or improper acts;
- Compliance with a legal obligation; or
- Other legitimate purposes as permitted by applicable law.

In the process of monitoring our offices, systems, network and work-related activities, we may come across your Personal Information. Monitoring will be done in a manner that is proportionate and only as required or permitted by applicable laws. We will always strive to respect your reasonable privacy expectations.

Lastly, we want you to be aware that all Company's employee work product as well as tools used to generate that work product, wherever stored, belongs to the Company and we may review and monitor them for the purposes described above.

## **Links to Other Sites**

Our websites may provide links to websites or social media pages operated by other third parties. If you click through to another website or webpage, your activity will be subject to the privacy policy of that website or webpage, and not to this HR Privacy Notice. We recommend that you review the privacy policies of other websites or webpages before you use them.

## **Use of Company websites by a child under Age 16**

Our HR-related platform, websites, or applications (other than benefit-enrollment that collects dependent's information, such as benefit-eligible employees' children or other benefit-eligible dependent(s)) are not directed to or intended to be used by anyone under the age of 16. We do not knowingly collect information from children under the age of 16 and therefore are not aware that we sell or share Personal Information of any consumers under age 16. If you are under 16, please do not attempt to fill out our HR-related forms or send any Personal Information to us. If a child under age 16 provides us with any Personal Information, the parent or guardian should notify us by sending an email to [privacy@corps-solutions.com](mailto:privacy@corps-solutions.com). Upon receipt of the email, we will delete the child's information, and will remove it from any promotional contact list and database. If we learn that we have collected Personal Information from a child under age 16, we will delete that Personal Information promptly.

## **Changes to Our HR Privacy Notice**

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

## **Exercising Access, Data Portability and Deletion Requests**

To exercise your California privacy rights described above, please submit a verifiable consumer request to the us through any method listed in the "Contact Information" section below.

# CORPS SOLUTIONS

---

Only you may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child under the age of 16.

Under the California Privacy Laws, you may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify your identity and 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. As permitted by law, we may require you to verify your own identity in response to a request, even if you choose to use an agent.

## Contact Information

If you have any questions or comments about this notice, the ways in which Corps Solutions collects and uses your Personal 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: 1-540-699-2769

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

Mailing Address:

Corps Solutions, LLC

ATTN: Human Resources

233 Garrisonville Rd, Suite 202

Stafford, VA 22554