

California Consumer Privacy Act

NOTICE TO APPLICANTS

Trilogy (the “Company,” “we,” “us,” “our”) is providing this Privacy Notice (“Notice”) pursuant to the California Consumer Privacy Act (“CCPA”).

If you do not reside in California, the Company has decided to provide this notice as a courtesy to you.

DEFINITIONS

For purposes of this Notice, “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an Applicant who resides in California. For example, this information may include your name, social security number, email address, telephone number, fax number, physical address, username, fingerprints, and inferences from other personal information that could create a profile about your preferences and characteristics.

For purposes of this Notice, “**Sensitive Personal Information**” is a specific subset of personal information that includes certain government identifies, such as social security numbers, work authorization status, race, religion, ethnicity, nationality or national origin, age, gender identity, sex, life or sexual orientation, criminal convictions and offenses, marital status, medical or health information (including disability status), genetic or biometric information, religious or philosophical beliefs, political party or trade union membership, background information and veteran status. In addition, the following information is considered sensitive personal information: precise geolocation, driver's license number, state identification card number, passport number, account log-in/financial account/debit card/credit card number in combination with any required security or access code, password, or credentials allowing access to an account, and the contents of mail, email and text messages, unless the Company is the intended recipient of the communication.

For purposes of this Notice, “**Other Information**” is information relating to your experience and the position you are applying to. This information includes but may not be limited to: previous work experience, education, degrees, language, employment-related information; professional and other related licenses, permits, and certifications; awards and professional memberships; employment references, willingness to relocate, desired salary; information related to references; and information from social media sites if you link your application to those sites.

Information we hold regarding your application may be obtained through your expression of interest in our job postings, through your application on our website/applicant tracking system, and through information we obtain about you through third parties, such as recruiters, references, former employers and law enforcement agencies.

For purposes of this Notice, “**Purposes of Use**” include, but are not limited to:

1. **Managing and Engaging Applicants:** to manage the application process, to set up an applicant file, to analyze your qualifications for the job applied for or future jobs we consider you for, to screen applicants for risks to the Company; to fulfill recordkeeping and conduct reporting; to support our efforts to maintain a diverse workforce; including data analytics and trend analyses, and for purposes of identification, to facilitate communication, interaction and collaboration regarding applicants.
2. **Security and Compliance:** to conduct required criminal history, background, and employment checks; to conduct internal audits, to conduct internal investigations, to protect the safety and security of Company's facilities, to ensure compliance with federal, state and local regulations,

including occupational health and safety compliance, to prevent illicit activity and report suspected criminal conduct to law enforcement and cooperate in investigations.

3. **Conducting Our Business:** evaluating source of candidates, device ID, browsing history, advertisements, and interaction with our website.

CATEGORIES AND PURPOSE OF USE OF INFORMATION

The Company collects the following categories of information through its Applicant Tracking System, Human Resource and our HRIS Paylocity. Information in these systems may also be shared through external systems for the performance of pre-employment or post-employment required processes. We recommend you review the applicable policies for these systems as they pertain to your information as well. These external systems perform processes like background checks, reference checks, credit and criminal checks. For details about Paylocity's Policy, click [here](#).

The Company collects the following categories of information through its Human Resource and other systems, i.e. Paylocity, Compliance Software, Integrated Applications, and Third-Party Systems.

Category of Personal Data	Examples of Personal Information Collected	Purpose
Identification Information	Real name, preferred name, postal address, email address, phone or fax number, unique personal or online identifier, Social security number, signature, photographs, internal protocol address, identification documents provided for work eligibility verification.	Managing and Engaging Applicants; Security and Compliance; Conducting Our Business
Professional or Employment Related Information	Work history, reference information, licenses, permits, certifications, degrees, skills, and other employment related information.	Managing and Engaging Applicants; Security and Compliance
Financial Information	Credit check results and any follow-up requested information.	Managing and Engaging Applicants, and Security and Compliance
Health Information	Accommodation requests during application processes, safety-related medication for job requirements, drug tests.	Managing and Engaging Applicants, and Security and Compliance
Demographic Information	Information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, and information about disability status to the extent an applicant may need special assistance during the application process or during emergencies from the Company or from first responders.	Managing and Engaging Applicants (Sensitive demographic Personal Information will be collected on a purely voluntary basis, except where required by law, and used only in compliance with applicable laws and regulations.

Internet or Other Network Activity	Information from use of our Applicant Tracking System, cookies, etc.	Security and Compliance
Background Screening Information	Background screening information and the results of requested background screening, such as criminal history, sex offender registration, motor vehicle records, credit history, employment history, drug testing, and/or educational history.	Managing and Engaging Applicants; Security and Compliance
Preference Information	Applicant preferences information, including but not limited to, desired working hours, workspace preferences, and preferred work supplies.	Managing and Engaging Applicants; Security and Compliance
Geolocation Data	Geolocation information, such as IP address and other device metadata, that can be used to determine a device's physical location.	Security and Compliance

OTHER USES OF INFORMATION

The Company may also use Information to facilitate administrative functions. These functions include, but are not limited to the following:

- to manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning;
- to manage litigation involving the Company, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- in connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of the Company or any of its subsidiaries or affiliates; and
- to manage licenses, permits and authorizations applicable to the Company's business operations.

RETENTION & DISPOSAL

Applicant information is retained to the degree necessary for business purposes, as required by law, or due to legal proceedings. Our records retention policy defines the period of time we retain both applicant and employee pre-employment and post-employment records. If you have questions about our policy, please contact the Human Resources Department. Destruction of applicant data and records will occur in a secure fashion.

SELLING OR SHARING PERSONAL INFORMATION

For purposes of the CCPA, the Company does not sell or share the personal information or sensitive personal information of job applicants or employees.

APPLICANT RIGHTS

If you are a California resident, you may ask the Company to disclose what personal information they have about you and what they do with that information (up to twice per year), to delete your personal information, to direct businesses not to sell or share your personal information, to correct inaccurate information that they have about you, and to limit businesses' use and disclosure of your sensitive personal information, if possible. Contact the Human Resources department for further details.

ANTI-RETALIATION

The Company will not discriminate against any applicant for exercising their rights under this policy. If you exercise certain rights under this policy, please note that use or access to systems or services may be interrupted or unavailable. The Human Resources Department will evaluate alternative methods of use/access where available.

QUESTIONS

Please contact the HR Department, HR@Trilogyfs.com, with any questions or if you would like an alternative form of this Notice.