

California Consumer Privacy Act

NOTICE TO EMPLOYEES

Trilogy (the “**Company**,” “**we**,” “**us**,” “**our**”) is providing this Privacy Notice (“**Notice**”) pursuant to the California Consumer Privacy Act (“**CCPA**”). The Company is committed to protecting the privacy and security of personal information of our current and former employees (“**Employees**” or “**Personnel**”) and their emergency contacts and beneficiaries. The Company does not sell or otherwise disclose this personal information for monetary or other consideration to any third parties.

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 Employee who resides in California. For example, this information may include your name, social security number, email address, internet browsing history, geolocation data, 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 identifiers, such as social security numbers, account login, financial account, debit card, credit card number with security code, password, precise geolocation, contents of mail, email, text messages, genetic data, biometric data, sex life, sexual orientation, information about racial or ethnic origin, religious or philosophical beliefs, or union membership.

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

1. **Managing and Engaging Personnel:** to manage personnel matters, to set up a personnel file, to administer compensation, bonuses, equity grants, other forms of compensation, and benefits (as applicable, and as permitted by law), to manage vacation, sick leave, and other leaves of absence, to provide training, to evaluate job applicants, to evaluate job performance, to design and engage in career development and other employee engagement programs, to screen employees for risks to the Company, to conduct employee surveys, to engage in crisis management, to fulfill recordkeeping and conduct reporting, including data analytics and trend analyses, to maintain an internal employee directory and for purposes of identification, to facilitate communication, interaction and collaboration among employees, to manage employee-related emergencies, including health emergencies, and to promote the Company and arrange and manage Company-sponsored events and public service activities.
2. **Security and Compliance:** to monitor use of Company information systems, to conduct internal audits, to conduct internal investigations, to protect the safety and security of Company’s facilities and personnel, to manage reimbursement of business expenses, to ensure compliance with federal, state and local regulations, including occupational health and safety compliance, to obtain appropriate insurance coverages, including worker’s compensation, to prevent illicit activity and report suspected criminal conduct to law enforcement and cooperate in investigations.
3. **Conducting Our Business:** to communicate with prospective, current, and former customers, to make business travel arrangements and manage business expenses and reimbursements,

to promote the business, to fulfill Company business objectives, including error prevention, quality assurance and improvement, product and service development and fulfillment, to engage in project management, and to provide a directory and contact information for prospective and current customers and business partners.

CATEGORIES AND PURPOSE OF USE OF INFORMATION

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	<ul style="list-style-type: none"> - Real name - Preferred name - Postal address - Email address - Phone number - Unique personal or online identifier - Bank account name and number - Internet Protocol address - Social Security number - ID documents for work eligibility verification - Signature - Date of birth - Other similar identifiers 	Managing and Engaging Personnel; Security and Compliance; Conducting Our Business; and use for general human resource purposes.
Professional or Employment Related Information	<ul style="list-style-type: none"> - Performance management information, such as employment status (full-time or part-time, regular or temporary), work schedule, attendance, job assignments, hours worked, accomplishments and awards - Training and development information - Performance evaluation information - Discipline and counselling information - Employment termination information - Compensation, bonuses, equity grants - benefits - personnel files - corporate credit card details and expenses - membership in professional organizations - education, professional certifications - Current and past employment history 	Managing and Engaging Personnel; Security and Compliance; Conducting Our Business and use for general human resource purposes.
Financial Information	<ul style="list-style-type: none"> - Financial information, including bank account name, bank account routing and accounts numbers - debit card numbers - tax information for state and federal withholding certificates (e.g. W-4) 	Managing and Engaging Personnel, and Security and Compliance

Records identified by state law	<ul style="list-style-type: none"> - Name - Signature - Social Security number - Address - Telephone number Passport number, driver's license or state identification card number - Insurance policy number - Education - Employment history - Bank account number - Credit card information or any other financial information - Medical information or health insurance information 	Managing and Engaging Personnel; Security and Compliance; Conducting Our Business and use for general human resource purposes.
Health Information	<p>Health information provided to participate in Company health insurance plans, wellness programs, and other benefits programs, as applicable.</p> <p><i>Note: This Notice does not cover medical information governed by the Health Insurance Portability and Accountability Act or the Health Information Technology for Economic and Clinical Health Act.</i></p>	Managing and Engaging Personnel, and Security and Compliance.
Demographic Information	<ul style="list-style-type: none"> - Race - Religious creed - National origin - Ancestry - Physical or mental disability - Medical condition - Marital status - Sex - Age - Military and veteran status 	<p>Managing and Engaging Personnel (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).</p> <p>The Company also collects information necessary for benefits enrollment and administrative purposes.</p>
Sensory Data	<ul style="list-style-type: none"> - Audio and visual information. 	Managing and Engaging Personnel; Identification purposes; Promoting the Company.

Internet or Other Network Activity	<ul style="list-style-type: none"> - Email, computer, internet, telephone, and mobile device usage - IP address, log-in information, and location information - Browsing history, search history, or information regarding your interaction with a website, application or advertisement 	Security and Compliance
Background Screening Information	<ul style="list-style-type: none"> - 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 Personnel; Security and Compliance
Preference Information	<ul style="list-style-type: none"> - Employee preferences information, including but not limited to, preferred meals, seating and other travel preferences, desired working hours, workspace preferences, and preferred work supplies. 	Managing and Engaging Personnel; Security and Compliance
Geolocation Data	<ul style="list-style-type: none"> - Geolocation information, such as IP address and other device metadata, that can be used to determine a device's physical location. 	Security and Compliance
Inferences drawn from other personal information	<ul style="list-style-type: none"> - Profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, abilities and aptitudes. 	Managing and Engaging Personnel.
Personal Data about children under the age of 16	<ul style="list-style-type: none"> - Personal information about Employees' dependents under the age of 16. 	Managing and Engaging Personnel; other human resource purposes that involve such dependents.
Legal and Contractual Information	Information necessary to respond to law enforcement and governmental agency requests; comply with legal and contractual obligations' exercise legal and contractual rights' and initiate or respond to legal claims	Security and Compliance.
Emergency Contact Information	<ul style="list-style-type: none"> - Name and contact information - Relationship to Employee 	Contact designated contact person in the event of an emergency.
Beneficiary Information	<ul style="list-style-type: none"> - Name and contact information - Relationship with the Employee - Birth date - Social Security Number - Information necessary to process benefits claims 	Manage and Engage Personnel; other human resource purposes that involve such dependents.

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.

DISCLOSURE OF PERSONAL INFORMATION

We may share your personal information as necessary for the purposes described in the Privacy Notice. For example, we share your personal information with the following parties:

- **Affiliates:** We may share your personal information with our affiliates.
- **Service Providers:** We use service providers to operate, host and facilitate our operations and business. These include technology and communication, security consultants, analytics providers, background and reference check screening services, and hiring process and benefits management and administration tools.
- **Government Authorities and law enforcement:** In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities.
- **Professional advisors:** We may share your personal information with our professional advisors.

DATA RETENTION

The Company retains your Personal Information for as long as necessary to fulfill the purposes for which it was collected, or as otherwise required by applicable law, regulation, or legitimate business needs.

EMPLOYEE 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 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, and erase your personal information, if possible. Contact the Human Resources department for further details.

ANTI-RETALIATION

The Company will not discriminate against any employee 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.