

CPRA PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This CPRA Privacy Notice (“**Notice**”) applies to “**Consumers**” as defined by the California Consumer Privacy Act 2018, Cal. Civil Code Section 1798.100 et. seq., as amended, and related regulations, as may be further amended from time to time and is a supplement to other Workforce Business Services (“WBS”) privacy policies or notices. In the event of a conflict between any other WBS policy, statement or notice and this Notice, this Notice will prevail as to Consumers and their rights under the CCPA.

The California Consumer Privacy Act (“CCPA”) was effective as of January 1, 2020 and the California Privacy Rights Act (“CPRA”), also known as Proposition 24, took effect on December 16, 2020 with most of the provisions revising the CCPA becoming effective as of January 1, 2023.

Any terms defined in the CCPA have the same meaning when used in this Notice.

WBS is a Professional Employer Organization (PEO) and as a PEO is considered to be a co-employer and is classified as a Business under the CCPA. WBS does not sell data as defined by the CCPA.

This Notice covers the collection, use, disclosure, and retention of Consumers’ “Personal Information” (“PI”) as defined by the CCPA, except to the extent such PI is exempt from the notice obligations of the CCPA. This Notice also covers rights Consumers have under the CCPA as well other notices to Californians required by other laws.

Managing PI

Consistent with the CCPA our description in this Notice of our collection and use, disclosure and retention of PI reflects our current practices and will be updated as needed. When the notice is updated, we will provide information about the changes we have made, as well as the date of the update.

Collection and Use

The chart below describes the categories of PI collected in the previous twelve months, the business or commercial purposes for such collection, and the categories of service providers and third parties with whom we have disclosed PI in the previous twelve months:

Category of PI	Sources of PI	Business or Commercial Purposes for PI Collection	Categories of Service Providers and Third-Party Recipients with whom we have disclosed your PI
<p>1. Identifiers</p> <p>This may include but is not limited to: a real name, alias, postal address, unique personal identifier, online identifier, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees • Requests submitted through our website gowbs.com 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) • Security and Fraud Prevention • Auditing Related to a Current Interaction 	<ul style="list-style-type: none"> • Client companies • Health and welfare service providers
<p>2. Personal Records</p> <p>This may include information such as: physical characteristics or description, signature, telephone number, education, employment, employment history, insurance policy number, bank account number, credit card number, debit card number, or any other financial information medical information, or health insurance information.</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees • Requests submitted through our website gowbs.com • Health and Welfare service providers • Financial service providers 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) • Security and Fraud Prevention 	<ul style="list-style-type: none"> • Client companies • Health and welfare service providers • Financial service providers

<p>3. Consumer Characteristics</p> <p>This may include, but is not limited to: sex, marital status, religion, veteran status, familial status, race, disability, gender identity, and creed.</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) 	<ul style="list-style-type: none"> • Client companies
<p>4. Customer Account Details / Commercial Information</p> <p>This may include, but is not limited to: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) 	<ul style="list-style-type: none"> • Client companies • Financial service providers
<p>5. Biometric Information</p> <p>This may include but is not limited to: genetic, physiological, behavioral, and biological characteristics, that can be used to establish individual identity, including but not limited to fingerprints, voiceprints, retina scans from which an identifier template can be extracted, and other physical patterns, and sleep, health, or exercise data, that contain identifying info.</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) 	<ul style="list-style-type: none"> • Client companies

<p>6. Sensitive Personal Information</p> <p>This may include, but is not limited to Social security number, driver's license, state ID card, passport number, a consumer account login, financial account, debit card or credit card number in combination with any: required security code, password, credentials allowing access to an account, a consumer's precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, contents of: a consumer's mail, email and text messages (unless the business is the intended recipient), consumer's genetic data, processing of biometric information for the purpose of uniquely identifying a consumer, Information collected and analyzed concerning a consumers health, sex life and sexual orientation</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) 	<ul style="list-style-type: none"> • Client companies
<p>7. Professional or Employment Information</p> <p>This may include, but is not limited to: professional, educational, or employment-related information.</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) 	<ul style="list-style-type: none"> • Client companies • Recruiting service providers • Employment screening service providers • HR analytics providers

<p>8. Inferences from PI Collected</p> <p>This may include, but is not limited to: creating a profile about a Consumer reflecting the Consumer’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> • Client companies • Client worksite employees 	<ul style="list-style-type: none"> • Delivering Services (Performing services on behalf of the Client or Client worksite employee) 	<ul style="list-style-type: none"> • Client companies
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As permitted by applicable law, we do not treat de-identified data or aggregate consumer information as PI and we reserve the right to convert, or permit others to convert, your PI into deidentified data or aggregate consumer information. We have no obligation to re-identify such information or keep it longer than we need it to respond to your requests. This helps us practice data minimization, which we consider to be a privacy best practice consistent with our mission to respect our employees and customers.

We do not collect or process Sensitive Personal Information for purposes of inferring characteristics about individuals.

Retention of PI

We store PI for no longer than is necessary for the performance of our obligations or to achieve the purposes for which the PI was collected, or as may be required or permitted under applicable law. To determine the appropriate retention period, we will consider the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorized use or disclosure of the data; the purposes for which we process the data and whether we can achieve those purposes through other means; and the applicable legal requirements. Unless otherwise required by applicable law, at the end of the retention period we will remove PI from our systems and records or take appropriate steps to properly anonymize, deidentify, or aggregate it, where legally applicable.

Sale of PI

We do not “sell” your PI as defined under the CCPA. Until such time as we change this policy by updating this Notice and provide a method to opt-out of a sale, we will treat PI collected under this approach as subject to a Do Not Sell request. Notwithstanding

anything to the contrary in our other privacy notices, we typically restrict use of your PI to the business purpose associated with that Service Provider. Additionally, your requests that direct us to disclose PI are not considered a sale.

California Privacy Rights

The CCPA provides you with specific rights regarding our use and disclosure of your PI:

The Right to Know

You have the right to send us a request, no more than twice in a twelve-month period, certain information about our collection, use, disclosure and sharing of PI, or access to specific pieces of PI.

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for our collecting or selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you. You have the right to make or obtain a transportable copy, no more than twice in a twelve-month period, of your PI that we have collected since January 1, 2022 and are maintaining. Please note that PI is retained by us for various time periods, so we may not be able to fully respond to what might be relevant going back 12 months prior to the request.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.
- A list of the categories of PI sold about you in the prior 12 months, or that no sale occurred.

You may submit requests through to Workforce Business Services LLC, 1401 Manatee Avenue West, Suite 600, Bradenton, Florida 34205, Attention: Dept. CCPA.

Right to Correct

You may request to have your personal information corrected if inaccurate.

Do Not Sell

As noted above, we do not sell your PI as such is defined under the CCPA. Until such time as we change this policy by updating this Notice, we will treat PI collected as subject to a Do Not Sell request. If you are 16 years of age or older, you have the right to direct us to not sell your PI.

The data practices of third-party cookies and tracking technologies associated with our websites and mobile apps do not constitute a “sale” of your PI as defined by the CCPA. However, you can exercise control over browser-based cookies by adjusting the settings on your browser, and mobile devices may offer ad and data limitation choices. Our position on this may change if regulatory guidance or industry consensus leads us to a different conclusion, in which case we will update this Notice and our data practices.

We do not knowingly sell the PI of Consumers who are under 16 unless we receive an opt-in from the Consumer who is at least 13 but under 16, or from the parent or guardian of a Consumer younger than 13. Consumers who opt-in to PI sales may opt-out at any time. If you think we may have unknowingly collected the PI (for sale) of yourself or of your child under the age of 13, or if you are at least 13 but under 16, exercising the opt-out will stop our selling of the PI.

We may disclose your PI for the following purposes, which are not considered a sale: (i) if you direct us to share PI; (ii) to comply with your requests under the CCPA; (iii) disclosures with client companies or amongst the entities that constitute Company as defined above, or as part of a merger or asset sale; and (iv) as otherwise required or permitted by applicable law.

Delete

Except to the extent, we have a basis for retention under CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining.

Right to Restrict Use of Sensitive Personal Information

You have the right to request that we limit the use and disclosure of your Sensitive Personal Information for other purposes, including disclosure to third parties.

Non-Retaliation

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.

Right to Opt Out of Automated Processing

While we do not use such processes or technologies, you have the right to opt out of the use of automated decision-making technology, which can include individual profiling.

Right to Data Portability

You have the right to request that we transmit specific pieces of your data to another entity, however, this transmission should be technically feasible for the organization.

How to Exercise Your Rights

You have the right to exercise these rights via an authorized agent who meets the agency requirements of the CCPA and related regulations. As permitted by the CCPA, any request you submit to us is subject to an identification and residency verification process (“**Verifiable Consumer Request**”). This process may consist of, but is not limited to, our agents verifying your identity through established protocols or asking you to confirm information previously submitted to the WBS.

We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably verify you are the Consumer about whom we collected PI. You may also contact the WBS at WBS.CCPA@gowbs.com or 1-866-293-3600.

If we cannot comply with a request, we will explain the reasons in our response. You are not required to create an account with us to make a Verifiable Consumer Request. We will use PI provided in a Verifiable Consumer Request only to verify your identity or authority to make the request and to track and document request responses, unless you also gave it to us for another purpose.

We will make commercially reasonable efforts to identify PI that we collect, process, store, disclose and otherwise use and to respond to your Consumer privacy rights requests. We reserve the right to direct you to where you may access and copy responsive PI yourself. We will typically not charge a fee to fully respond to your requests; provided, however, that we may charge a reasonable fee, or refuse to act upon a request, if your request is excessive, repetitive, unfounded or overly burdensome. If we determine that the

request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision. You will be provided a cost estimate and the opportunity to accept such fees before we will charge you for responding to your request.

Consistent with the CCPA and our interest in the security of your PI, we will not deliver to you your social security number, driver license number or other government-issued ID number, financial account number, any health or medical identification number, an account password, or security questions or answers in response to a CCPA request; however, you may be able to access some of this information yourself through your account if you have an active account with us.

Authorized Agents

If you choose to submit a request through an authorized agent, we require you to:

- Provide the authorized agent written permission to submit a request, a copy of which must be submitted to us;
- Verify that instruction and their own identity directly with us.

If the authorized agent has a power of attorney issued under California Probate Code sections 4000 to 4465, then the written agreement is not necessary. In the absence of any of the two general conditions detailed above, we will reject any request submitted through an agent.

In addition, the agent is subject to the verification standards applicable to the type of request(s) made.

Exclusions

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your CCPA rights. In addition, we need not honor any of your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

Additional Notices

In addition to CCPA rights, certain Californians are entitled to certain other notices, including:

Third-Party Marketing and Your California Privacy Rights

Separate from your CCPA “Do Not Sell” rights you have the following additional rights regarding disclosure of your information to third parties for their own direct marketing purposes:

We may from time to time elect to share certain “personal information” (as defined by California’s “Shine the Light” law) about you with third parties for those third parties’ direct marketing purposes. California Civil Code § 1798.83 permits California residents who have supplied personal information, as defined in the statute, to us to, under certain circumstances, request and obtain certain information regarding our disclosure, if any, of personal information to third parties for their direct marketing purposes. If this applies, you may obtain the categories of personal information shared and the names and addresses of all third parties that received personal information for their direct marketing purposes during the immediately prior calendar year (e.g. requests made in 2020 will receive information about 2019 sharing activities). To make such a request, please provide sufficient information for us to determine if this applies to you, attest to the fact that you are a California resident and provide a current California address for our response. You may make this request by contacting WBS by email at wbs.ccpa@gowbs.com or by regular mail at: Workforce Business Services LLC, Attention: Dept. CCPA, 1401 Manatee Avenue West, Suite 600, Bradenton, Florida 34205. Be aware that not all information sharing is covered by the Section 1798.83 requirements, and only information on covered sharing for California customers will be included in our response.

As these rights and your CCPA rights are not the same and exist under different laws, you must exercise your rights under each law separately.

For More Information

For more information on your California privacy rights contact WBS at 1-866-293-3600 or by email at wbs.ccpa@gowbs.com or by mail to Workforce Business Services LLC, Attention: Dept. CCPA, 1401 Manatee Avenue West, Suite 600, Bradenton, Florida 34205.