CALIFORNIA NOTICE AT COLLECTION

Purpose and Scope

Zempleo, Inc. provides this CCPA/CPRA Notice at Collection ("Notice") to describe our privacy practices for California applicants, candidates, employees, temporary employees, former employees, and other workforce-related individuals under the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA").

This Notice applies to California residents only who apply for or are considered for employment or placement with Zempleo, as well as Zempleo employees, temporary employees, and former employees. Temporary employees of Zempleo are treated as employees because they are employed by Zempleo. The notice and rights described apply to California residents only, except as otherwise required by applicable law

This Notice is provided at or before the time Zempleo collects personal information in connection with recruitment, consideration for employment or placement, hiring, onboarding, employment, assignment administration, and related workforce activities.

Categories of Personal Information We Collect

Category	Examples
Identifiers	Name, alias or preferred name, home address, personal and work email address, telephone number, employee ID, Social Security number, driver license or state identification number, signature, and other similar identifiers.
California customer records information	Payroll records, tax withholding forms, direct deposit information, employment eligibility documentation, emergency contact information, benefits enrollment information, and other employment-related records.
Protected classification characteristics	Information such as age, race, ethnicity, sex, gender, disability status, marital status, military or veteran status, and other legally protected characteristics when collected for legally permitted employment, reporting, benefits, accommodation, or compliance purposes.
Recruitment & employment-related information	Job applications, resumes, cover letters, interview notes and evaluations, references, recruiter communications, candidate assessments, employment and education history, qualifications, job title, assignment information, work location, client assignment details, scheduling records, time and attendance records, payroll records, training records, workplace conduct records, disciplinary records, performance-related records, and separation records.
Background check and screening information	Background screening results, credential verification, employment verification, criminal history information where legally permitted, drug screening results, and related vendor reports.
Internet, network, and electronic activity information	System login data, HRIS activity records, timekeeping platform activity, use of Company systems or accounts, electronic communications metadata, and device or application activity associated with Company systems, where applicable.
Audio, visual, and similar information	Photographs for identification or personnel records, recorded calls or voicemails where applicable, and video or other visual records created for workplace safety, security, training, or administration purposes.
Professional and education information	Licenses, certifications, credentials, education history, work history, resume information, training completion records, references, and qualifications related to an employment or placement opportunity or assignment requirement.
Inferences	Limited inferences drawn from applicant, candidate, or employment-related information for candidate evaluation, assignment matching, workforce administration, compliance, security, or business operations, where applicable.

Categories of Sensitive Personal Information We Collect

Zempleo may collect sensitive personal information where reasonably necessary and permitted by law for recruitment, applicant evaluation, employment eligibility, hiring, payroll, benefits, screening, compliance, workplace safety, or other recruitment and employment-related purposes. Sensitive personal information may include:

- Social Security number, driver license number, state identification number, passport number, or other government identifiers;
- Payroll, direct deposit, tax, and financial account information used for payroll or reimbursement purposes;
- Health, medical, leave, accommodation, benefits, workers compensation, or workplace safety information;
- Drug screening results and related screening information where permitted by law;
- Background check information and related screening results where permitted by law;
- Account login credentials or access information for Company systems where such information is collected or administered by Zempleo.

Zempleo does not collect biometric information, GPS or precise geolocation tracking data, or vehicle data as part of its recruitment, applicant processing, employee onboarding, and workforce administration practices.

Sources of Personal Information

- Applicants, candidates, and employees directly;
- Recruiters, staffing sources, job boards, applicant tracking systems, and professional networking platforms;
- References identified by applicants or candidates, former employers, educational institutions, and licensing or credentialing organizations, where permitted by law;
- Authorized family members, dependents, beneficiaries, or emergency contacts when provided by the employee;
- Background check vendors and credential verification providers;
- Drug screening vendors;
- Benefit providers, insurance carriers, and related benefit administrators;
- Timekeeping platforms and workforce management systems;
- Human Resources Information System (HRIS) providers;
- Payroll, tax, and accounting service providers;
- Client companies where necessary to administer assignments, verify hours, coordinate work, comply with contractual requirements, or address workplace matters;
- Government agencies, courts, law enforcement, and regulators where permitted or required by law.

Business Purposes for Collection and Use

- Recruitment, candidate sourcing, application processing, interviews, evaluation of qualifications, communications regarding opportunities, and consideration for employment or placement;
- Hiring, onboarding, identity verification, employment eligibility, and personnel administration;
- Payroll processing, wage and hour compliance, tax reporting, wage statements, reimbursements, and accounting;
- Benefits administration, open enrollment, insurance, leave management, accommodations, and workers compensation administration;
- Timekeeping, attendance tracking, scheduling, assignment administration, and workforce management;
- Background checks, credential verification, drug screening, and compliance with client, legal, or safety requirements;
- Training, certifications, policy administration, workplace investigations, disciplinary processes, and performance-related administration;

- Maintaining workplace safety, security, fraud prevention, and protection of Company personnel, systems, and assets;
- Providing information to client companies as necessary for assignment administration, site access, credential verification, workplace safety, billing, time approval, contractual compliance, and communication regarding the employee assignment;
- Complying with federal, state, and local laws, regulations, subpoenas, audits, investigations, and other legal obligations;
- Exercising or defending legal claims and enforcing Company policies, agreements, and rights.

Disclosure and Client Company Data Sharing

Zempleo may disclose applicant, candidate, and employee personal information to service providers, contractors, client companies, professional advisers, government agencies, and other recipients when reasonably necessary for recruitment, candidate evaluation, consideration for placement, employment-related purposes, business operations, legal compliance, or the administration of employee assignments.

Client Company Data Sharing Clause. Because Zempleo recruits and provides employees for temporary or client-site assignments, Zempleo may disclose relevant applicant, candidate, or employee personal information to client companies when reasonably necessary to evaluate qualifications, consider or facilitate a placement opportunity, administer an assignment, verify qualifications or credentials, approve time worked, coordinate scheduling, ensure site access, satisfy safety or security requirements, meet contractual obligations, support billing or invoicing, investigate workplace issues, respond to client workplace requirements, or comply with applicable law. Information disclosed to client companies may include, as applicable, name, contact information, application or resume information, work history, qualifications, assignment information, job title, work location, timekeeping information, certifications, training completion, background or drug screening clearance status where permitted, and other information necessary for consideration, placement, or the employment assignment.

Zempleo may disclose applicant, candidate, and employee personal information to the following categories of recipients:

- Client companies and client representatives for candidate evaluation, placement consideration, assignment administration, and related purposes;
- Recruiting, job board, applicant tracking system, assessment, reference verification, and candidate communications providers;
- Background check vendors and drug screening vendors;
- Benefit providers, insurance carriers, claims administrators, and leave administrators;
- Payroll processors, tax providers, accounting providers, and financial institutions;
- Timekeeping platforms, workforce management platforms, and HRIS providers;
- IT, security, document management, and business operations service providers;
- Auditors, attorneys, consultants, and professional advisers;
- Government agencies, courts, law enforcement, and regulators where permitted or required by law.

Zempleo does not sell applicant, candidate, or employee personal information. Zempleo does not share applicant, candidate, or employee personal information for cross-context behavioral advertising purposes.

Retention of Personal Information

Zempleo retains personal information only for as long as reasonably necessary to accomplish the purposes described in this Notice, comply with legal and contractual obligations, administer recruitment and employment, evaluate future employment or placement opportunities where appropriate, resolve disputes, maintain business records, and exercise or defend legal rights. Retention periods may vary by record type and applicable legal requirement.

Record Type	Retention Approach
Personnel, onboarding, and employment administration records	Retained for the period required by applicable employment, payroll, tax, staffing, contractual, and recordkeeping laws, and as otherwise reasonably necessary for business or legal purposes.
Payroll, timekeeping, wage, tax, and benefits records	Retained as required for wage and hour compliance, tax reporting, benefits administration, audits, and related legal obligations.
Background check and drug screening records	Retained according to applicable screening laws, client requirements, contractual obligations, and Company record retention practices.
Legal, safety, investigation, claims, and compliance records	Retained as needed to comply with legal obligations, preserve evidence, resolve disputes, and exercise or defend legal rights.
Applicant and candidate records	Retained for the period required by applicable recruiting, employment, staffing, anti-discrimination, contractual, and recordkeeping laws, and as otherwise reasonably necessary to evaluate future opportunities, resolve disputes, or exercise or defend legal rights.

Applicant, Candidate, and Employee Privacy Rights

California applicants, candidates, employees, temporary employees, and former employees may have the following rights under the CCPA/CPRA, subject to applicable legal exceptions:

- Right to know/access: to request information about the personal information Zempleo has collected, used, disclosed, sold, or shared, and to request access to specific pieces of personal information;
- Right to correct: to request correction of inaccurate personal information maintained by Zempleo;
- Right to delete: to request deletion of personal information collected from the individual, subject to legal exceptions;
- Right to limit use and disclosure of sensitive personal information: to request limitation of certain uses of sensitive personal information where the law provides that right;
- Right to opt out of sale or sharing: Zempleo does not sell applicant, candidate, or employee personal information and does not share such personal information for cross-context behavioral advertising;
- Right to non-discrimination and non-retaliation: Zempleo will not discriminate or retaliate against an applicant, candidate, employee, or other covered individual for exercising privacy rights.

How to Submit a Privacy Request

Applicants, candidates, employees, temporary employees, and former employees may submit privacy questions or requests by contacting Zempleo via email at: Privacy@zempleo.com. Requests can also be made by contacting Zempleo at 1111 6th Avenue, Suite 550, PMB 35362, San Diego, CA 92101 or calling 888-508-0015.

Zempleo may need to verify the identity and authority of the person making a request before responding. Zempleo will use information provided for verification only as necessary to process the request, fulfill legal obligations, and protect against fraud or unauthorized access.

Some information may be exempt from access, deletion, correction, or limitation requests under applicable law, including information needed to comply with recruitment, employment, payroll, tax, benefits, safety, legal, contractual, or recordkeeping obligations.

Updates to This Notice

Zempleo may update this Notice from time to time. Updated versions will be made available to applicants, candidates, employees, and other covered individuals, as applicable, and will supersede prior versions as of the stated effective date.

You can review Zempleo's Privacy Policy on the Company website here: https://zempleo.com/privacy-policy/ . Questions about this Notice should be directed to Zempleo Human Resources.