

California Employee & Candidate Privacy Notice

This CALIFORNIA PRIVACY NOTICE (“**Notice**”) IS FOR EMPLOYEES AND CANDIDATES WHO ARE CALIFORNIA RESIDENTS and supplements our Employee Privacy Policy and Candidate Privacy Policy. We have adopted this Notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”).

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**personal information**”). In particular, we collect:

A. Identifiers: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)): Including but not limited to name, signature, social security number, physical characteristics or description, address, telephone number, passport 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. Some personal information included in this category may overlap with other categories.

C. Protected classification characteristics under California or federal law: Age (40 years or older), national origin, citizenship, marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions).

F. Internet or other similar network activity: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

G. Geolocation data: Physical location or movements.

I. Professional or employment related information: Current or past job history or performance evaluations.

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)): Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

How We Collect Your Personal Information

We may collect personal information about you in the following ways:

- directly from you, such as through the application and hiring process (online or in-person)

California Employee & Candidate Privacy Notice

- during your activities in the course of your employment, such as through your performance and interaction with other employees, contractors, customers or other individuals or through your use of our online services and other similar applications
- from other parties, subject to the requirements of applicable law. These parties may include:
 - references
 - publicly available information
 - former employers
 - other employees (for example, to nominate and celebrate a colleague for outstanding achievements)
 - other third parties, such as background check agencies, police departments, company-approved third party travel management systems, and third party ride services (if and to the extent permitted by applicable law).

How We Use Collected Information

In accordance with applicable laws, we may collect and use personal information for the following purposes:

- determining eligibility for initial employment, including the verification of references and qualifications
- administering pay and benefits processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- establishing training and/or development requirements
- conducting performance reviews and determining performance requirements
- assessing qualifications for a particular job or task
- gathering evidence for disciplinary action, or termination
- establishing a contact point in the event of an emergency (such as next of kin)
- complying with applicable labour or employment statutes
- compiling directories
- ensuring the security of company-held information
- such other purposes as are reasonably required by VGW.

Sharing Your Information

We do not sell, trade, or rent employee personal information to others. From time to time, we may utilize the services of third parties (including companies within VGW Group) in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us. Where this is the case, we will take reasonable steps to ensure that they have demonstrated that they have the right to disclose your personal information to us.

Your personal information may also be disclosed:

- as permitted or required by applicable law or regulatory requirements. In such a case, we will endeavour to not disclose more personal information than is required under the circumstances.
- to comply with valid legal processes such as subpoenas or court orders.

California Employee & Candidate Privacy Notice

- as part of our regular reporting activities to other companies within the VGW Group (including outside of your home jurisdiction).
- to protect the rights and property of the VGW Group.
- during emergency situations or where necessary to protect the safety of a person or group of persons.
- where the personal information is publicly available.
- with your consent where such consent is required by law.

Your Rights Over Your Information

The CCPA provides Users who are California residents with specific rights regarding their personal information. You have the right to access the personal information we've collected about you during the past 12 months and information about our data practice. You also have the right to request that we delete the personal information we have collected from you.

Exercising Access and Deletion Rights

We appreciate that by law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. These rights include the right to access the personal information we hold about you, the right to object to the processing of your data and the right to withdraw any consent provided. In some circumstances, you can ask us to delete the personal information we hold about you.

To exercise the access and deletion rights described above please complete the VGW Group Access Request Form [here](#) or alternatively email dataprivacy@vgw.co.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Changes to this Notice

This Notice may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of changes by posting changes here, or by other appropriate means.

Contact Information

If you have any questions or comments about this Notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under CCPA, please do not hesitate to contact us at:

Email: dataprivacy@vgw.co
Attn: Data Protection Officer