

# California Job Applicants Privacy Policy

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This California Job Applicants Privacy Policy (“Privacy Policy”) applies to the personal information we collect on our careers webpage (our “Careers Site”), other online job postings that link to this Privacy Policy, and during the job application process from individuals who are California residents. This Privacy Policy describes the personal information we may collect about you, how we may collect your personal information, why we may collect and process your personal information, and provides details about your privacy rights in relation to your personal information. We may modify this Privacy Policy from time to time and will indicate any such modifications by changing the date at the top of this page.

Please take a moment to read this Privacy Policy carefully. If you do not agree with or are not comfortable with or do not understand any part of this Privacy Policy, please immediately discontinue your access to or use of our Careers Site. If you have questions about this Privacy Policy or how your personal information is being used, maintained or processed, please contact us through one of the methods identified in Section 8, **“HOW TO CONTACT US.”**

This Privacy Policy covers the following topics which can be accessed directly by clicking on the topics.

1. PERSONAL INFORMATION WE COLLECT
2. COOKIES AND OTHER TRACKING TECHNOLOGIES
3. WHY WE COLLECT YOUR PERSONAL INFORMATION
4. SHARING YOUR PERSONAL INFORMATION
5. YOUR PRIVACY RIGHTS
6. SECURITY OF YOUR PERSONAL INFORMATION
7. DATA RETENTION
8. HOW TO CONTACT US

## **1. PERSONAL INFORMATION WE COLLECT**

The term “personal information” for purposes of this policy has the same meaning as given to it in the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively “California Privacy Laws”). Personal information is typically data that identifies an individual or relates to an identifiable individual. This includes information you provide to us, information which is collected automatically, and information we obtain from third parties.

We may collect certain personal information about you when you browse our Careers Site, submit a job application to one of our open positions, or when we otherwise consider you for

employment. Listed below are the categories of personal information that we may process about you:

- **Identifiers**, such as your first, middle and last name, alias, postal address, email address, phone number, or other similar identifiers.
- **Other identifying information**, such as physical characteristics or description, date of birth or signature.
- **Characteristics of protected classifications under California or federal law**, such as age, race, color, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status to the extent any such information is voluntarily disclosed by you or otherwise publicly available.
- **Internet or other electronic network activity information**, such as your search history, browsing history, web request, IP address, browser type, or pages viewed.
- **Audio and Visual information**, such as photographs and videos that may be voluntarily disclosed by you, or audio and visual information collected during the interview process, or which may otherwise be publicly available.
- **Professional or employment-related information**, such as education history, work history, degree earned, certifications, and any other information provided in your resume and transcripts; your right to work documentation; references; any information provided during your interview or application process; or background check information when permitted by applicable law, such as the results of any background check in connection with your employment with us including, by way of example, your credit history and criminal records, if any.

We collect much of the personal information described above directly from you through the application forms and resumes you submit to us, as well as official documentation you provide to us. We also collect certain information from third parties, such as employment agencies (such as recruiters and headhunters) and former employers when gathering references, and service providers that collect it on our behalf, such as job posting board providers. Additionally, we may collect personal information about you through background check and credit reference agencies when permitted or required by law.

## 2. COOKIES AND OTHER TRACKING TECHNOLOGIES

We, and third parties on our behalf, may use cookies and similar tracking technologies (collectively, "**Tracking Technologies**") to collect personal information automatically as you interact with our Careers Site, including to:

- Analyze our web traffic using an analytics package,
- Identify whether you already visited our Careers Site,
- Store information about your preferences (e.g., cookie consent), and
- To recognize when you return to our career page.

**Cookies.** When you visit our Careers Site, we (or third-party data or ad networks we work with) may send one or more “cookies” to your computer or other devices. Cookies are alphanumeric identifiers stored on your computer through your web browser and are used by most websites to help personalize your web experience. Some cookies may facilitate additional site features for enhanced performance and functionality such as remembering preferences, analyzing usage for site optimization, allowing third parties to provide social sharing tools, and serving images or videos from third-party websites. Some features on our Careers Site might not function if you do not allow cookies. Your decision whether or not to allow cookies will have no impact on our consideration of your application.

**Managing Cookies.** You have the right to decide whether or not to accept cookies that are not strictly necessary. If you do not want us to deploy cookies in your browser, you may exercise your preference by modifying your web browser setting to either (1) refuse some or all cookies or (2) notify you and ask for your permission when a website tries to set a cookie. If you want to learn more about modifying your browser settings, please use the “Help,” “Tools” or “Edit” menu in your browser or review the instructions provided by the following browsers: [Internet Explorer](#), [Google Chrome](#), [Mozilla Firefox](#), [Safari Desktop](#), and [Android browser](#). If you choose to disable cookies in your browser, you can still use our Career Site, although you may not be able to use all of the features provided.

**Analytics.** We may use third-party service providers to monitor and analyze the use of our Career Site, such as Google Analytics. Google Analytics is a web analytics service offered by Google LLC (“Google”) that tracks and reports website traffic. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout>.

**Do Not Track.** Due to the fact that uniform standards for “Do Not Track” signals have not been adopted, we do not currently process or respond to “DNT” signals.

### **3. WHY WE COLLECT YOUR PERSONAL INFORMATION**

We collect the categories of personal information listed above for human resources, employment, benefit administration, health and safety, and business-related purposes and to comply with applicable laws and regulations. We may use your information to, by way of example:

- evaluate you in the context of your selected job opening and/or for available positions;
- evaluate and verify your experience and qualifications in relation to specific job requirements;
- contact you regarding your application and possible employment opportunities;
- conduct lawful background screening;
- make decisions about making employment offers;
- make decisions about job responsibility, salary and other benefits;

- carry out our human resources functions and activities;
- measure activities on and functionality of our Career Site;
- comply with our legal obligations, including:
  - carrying out checks in relation to your right to work;
  - equal opportunities monitoring;
  - determining reasonable accommodations;
  - making reasonable accommodations for disabled applicants and employees;
  - allowing us to carry out our legitimate business interests, such as business planning and restructuring, except where such interests are overridden by your interests in not having your personal information processed; and
- making improvements to our employment practices including improving diversity.

#### 4. SHARING YOUR PERSONAL INFORMATION

We take care to allow your personal information to be accessed only by those who we believe require access to perform their tasks and duties, and to share only with third parties who we believe have a legitimate purpose for accessing it. We will take reasonable precautions to only share your information in the following circumstances:

- **With Our Other Employees.** Your personal information may be shared with our employees (or those of our affiliates) where we believe it is necessary for them to undertake their duties with respect to your potential employment, such as interviewing you.
- **With Service Providers.** We may share your personal information with our contractors, vendors, and service providers that assist us with administering our employment or working relationship with you and/or provide services to us or on our behalf. For example, service providers may include, but are not limited to, job posting board providers, recruitment agencies, data storage or hosting providers, marketing/events agencies, and credit and criminal background check providers, as permitted under law.
- **With Other Third Parties.** We may share certain personal information with third parties who provide professional services (such as attorneys, auditors, accountants, management consultants, and medical service providers), professional bodies, and regulatory authorities.
- **Legal or Regulatory Requests and Investigations.** We may disclose your personal information to third parties where we believe that such disclosure is needed (i) to comply with relevant laws or regulations, to respond to a court order, administrative or judicial process, such as a subpoena, warrant, court order, or government audit; (ii) in response to requests by public authorities (such as national security or law enforcement); and (iii) as necessary to establish, exercise or defend against potential, threatened or actual

litigation or arbitration. We may also share your personal information with tax authorities, courts, regulators, the police, and other governmental authorities.

- **Business Transactions.** We may share your personal information with a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all our assets (including in the event of a reorganization, dissolution or liquidation), in which case, personal information held by us about you will be among the assets transferred to the buyer or acquirer. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.
- **Protection of Our Company or Others.** We may share your personal information where necessary to protect our company, including to investigate, prevent, or take actions regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.
- **Disclosures with Your Consent.** We may collect, use and disclose your personal information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect, use or disclose your personal data, and, where required, obtain your consent for so using your personal information.

## 5. YOUR PRIVACY RIGHTS

As a California resident, subject to certain exceptions, you have certain rights related to your personal information as identified below. Please note that your rights are not absolute. We may deny your request with respect to the exercise of such rights for, among other reasons: (a) when denial of the request is required or authorized by law; (b) when granting the request would have a negative impact on another's privacy; (c) to protect our rights and properties; or (d) where the request is frivolous or vexatious. Also, some of these rights are not applicable, given the limited ways in which we make use of personal information.

- **Right to Know.** You may have the right to obtain a copy, or a list of categories of the personal information that we hold about you, as well as other supplementary information, such as the purposes of processing, and the entities to whom we disclose your personal information.
- **Right to Correct.** You may request us to rectify, correct or update any of your personal information held by us that is inaccurate.
- **Right to Delete.** Under certain circumstances, you may have the right to request that we delete the personal information that we hold about you. This right is not absolute, and we may refuse your right to delete if it is reasonably necessary for us to provide any service requested by you; to perform any contract between you and us; to maintain functionality and ensure security of our systems; to exercise a right provided by law; to comply with a legal obligation; or to enable such uses of your personal information that you would expect.

- **Right to Portability.** Under certain circumstances, you may have the right to receive personal information we hold about you in a structured, commonly used, and machine-readable format so that you can provide that personal information to another person.
- **Right to Opt Out of Sale.** While we do not sell our applicant's or employee's personal information, if we were to change this practice, you would have the right to opt-out of any such sale.
- **Right to Opt Out of Sharing for Behavioral Advertising.** While we do not share our applicant's or employee's personal information for such purposes, if we were to change this practice, you would have the right to opt-out of the sharing of your personal information to third parties for cross-contextual behavioral advertising purposes.
- **Right to Limit Use of Sensitive Information.** While we do not use sensitive information (as such term is defined in the California Privacy Laws) for such purpose, if we were to change this practice, you have the right to direct us not to use your sensitive personal information to infer characteristic about you.
- **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section.

### **Exercising Your Rights**

You may exercise your rights by contacting us through one of the methods identified in the "How to Contact Us" section below, and include "CA Privacy Rights Request" in the re line of the email. In your request, please make clear which right you would like to exercise, and that you are a job applicant. Before fulfilling your request, we are required by law to have you verify the personal information we already have on file to confirm your identity. If we cannot verify your identity based on the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.

If you use an authorized agent to submit requests on your behalf, we will still need to require you to directly verify your identity with us and have you confirmed that the authorized agent has been authorized to act on your behalf.

## **6. SECURITY OF YOUR PERSONAL INFORMATION**

We understand the importance of your personal information. We maintain (and contractually require third parties we share your personal information with to maintain) appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification or disclosure.

However, we cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your data will not occur. Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including

email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us using the contact information provided in the “How to Contact Us” section.

## **7. DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we endeavor to retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, as required by law or to satisfy any legal or reporting obligations, or as necessary to resolve disputes or otherwise to comply with our internal information retention policies.

## **8. HOW TO CONTACT US**

If you have questions or concerns regarding this California Job Applicants Privacy Policy, please contact us at [Applicant.Privacy@ReadingRDI.com](mailto:Applicant.Privacy@ReadingRDI.com), or calling us at 888-668-4605. Because email communications are not always secure, please do not include sensitive information in your communications to us.