

The Sedona Group California Applicant Privacy Notice

Effective Date: January 1, 2023

This Applicant Privacy Notice ("Applicant Notice") applies to Personal Information of California residents who submit applications for employment ("Applicants") to The Sedona Group Ltd., Sedona Staffing Inc., Sedona Technologies Inc., and Sedona Technologies Government Services LLC (collectively, "Sedona," "we," "us," or "our"). This Applicant Notice is provided pursuant to the California Consumer Privacy Act, as amended (the "CCPA"). This Applicant Notice should be read in conjunction with all other policies that govern your relationship with us.

As used in this Applicant Notice, the term "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with Applicants. Personal Information does not include information that is publicly available, deidentified, or aggregated.

Unless otherwise noted, the disclosures contained within this Applicant Notice cover our activities in the twelve (12) months preceding the Effective Date, as well as our current practices.

1. HOW AND WHY WE COLLECT, USE, AND DISCLOSE YOUR PERSONAL INFORMATION

We may collect, use, and disclose the categories of Personal Information listed below for the business purposes indicated. Please note that the specific pieces of Personal Information we collect may vary depending on the nature of your interactions with us and may not include all of the examples listed.

Category of Personal Information	Business Purposes for Collection, Use, and Disclosure
Identifiers , such as name, date of birth, postal address, unique personal identifier, online identifier, internet protocol address, email address, social security number, and other similar identifiers	<ul style="list-style-type: none">• To process job applications• To assess qualifications for a particular job or task• To complete activities related to recruiting, onboarding, and employment referrals• To enable you to register an account and seek a job placement with Sedona• To manage and administer our websites• To recommend potential jobs for you
Personal records described in California Civil Code § 1798.80(e), such as, signature, telephone number, employment and employment history, financial information, and education	<ul style="list-style-type: none">• To process job applications• To assess qualifications for a particular job or task• To complete activities related to recruiting, onboarding, and employment referrals• To enable you to register an account and seek a job placement with Sedona• To manage and administer our websites• To recommend potential jobs for you
Characteristics of protected classifications under California or federal law, such as age, gender, military status, race, or ethnic origin	<ul style="list-style-type: none">• To process job applications• To determine obligations as an employer• To complete activities related to recruiting, onboarding, and employment referrals

Category of Personal Information	Business Purposes for Collection, Use, and Disclosure
	<ul style="list-style-type: none"> To comply with U.S. Equal Employment Opportunity Commission (“EEOC”) and California Civil Rights Agency (“CCRA”) requirements, and other equal opportunity initiatives
Internet or Other Electronic Network Activity Information such as browsing history, search history, and information regarding your interactions with our websites	<ul style="list-style-type: none"> To ensure and improve the security, integrity, and functionality of our websites To offer you information and employment-related opportunities
Geolocation data such as location data inferred from your device IP address, or your device and mobile location	<ul style="list-style-type: none"> To help you find jobs that are close to your location
Sensory Information (Including Audio, Visual, or Similar Information) such as CCTV for Applicants visiting our physical offices and audio recordings of phone or video interviews	<ul style="list-style-type: none"> To prevent and detect fraud and verify identity To manage the security of our premises and systems
Professional or employment-related information , such as resumes, former employers, work history, skills, certifications, minimum salary, career objective, desired job, referrals, distance willing to travel for work, preferred company size, dates available for work, hire type (full time or temporary), alcohol and/or drug screenings, and other information included on your resume	<ul style="list-style-type: none"> To process job applications To assess qualifications for a particular job or task To complete activities related to recruiting, onboarding, and employment referrals To recommend potential jobs for you To verify your identity and stated credentials To manage workplace safety and security
Non-public education information , such as school(s) attended, grades, transcripts, and other information relating to your secondary and post-secondary education	<ul style="list-style-type: none"> To process job applications To assess qualifications for a particular job or task To complete activities related to recruiting, onboarding, and employment referrals
Inferences drawn from Personal Information, such as preferences, characteristics, predispositions, behavior, or attitudes based on other Personal Information collected about you	<ul style="list-style-type: none"> We will only use this information for recruitment efforts, and it will not impact your current application or future employment with us

2. SENSITIVE PERSONAL INFORMATION

We collect the categories of sensitive Personal Information about Applicants that are indicated in the chart below. Note the specific pieces of sensitive Personal Information we collected about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

Category of Sensitive Personal Information	Business Purposes for Collection, Use, or Disclosure
Personal Information that reveals an Applicant's social security, driver's license, state identification card, or passport number	<ul style="list-style-type: none"> • To maintain Applicant records • To process job applications • To comply with applicable state, federal labor, employment, equal employment opportunity, and related laws
Personal Information that reveals an Applicant's account log-in in combination with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> • To maintain Applicant records • To process job applications
Personal Information that reveals an Applicant's racial or ethnic origin, religious or philosophical beliefs, or union membership	<ul style="list-style-type: none"> • To comply with U.S. Equal Employment Opportunity Commission ("EEOC") and California Civil Rights Agency ("CCRA") requirements, and other equal opportunity initiatives

3. SOURCES OF PERSONAL INFORMATION

We collect the Personal Information and sensitive Personal Information identified above from the following sources:

- **Directly from you.** For example, when you apply for a job, and throughout your interactions with us, including through our IT systems, company forms, and processes where Applicants submit information to us.
- **Automatically when using our digital services or visiting our premises.** For example, when you use our IT services, when you visit our websites, and when you access our facilities.
- **Sedona affiliates.** We receive Personal Information from Sedona affiliates, as permitted, to enable us to manage our business and workforce.
- **Screening providers,** such as drug testing and consumer reporting agencies, for background or credit checks; former employer or references in order to evaluate qualifications; and referral sources, such as current employees, recruiters, and job applicant platforms.
- **Service providers.** We may receive information about you from service providers, business partners or others. For example, we may receive your resume and other application information from entities such as LinkedIn or other job boards or job posting aggregates. If you apply for a job through Sedona Compass, we may also obtain employment-related information about you from your references.

4. CATEGORIES OF RECIPIENTS TO WHOM WE DISCLOSE PERSONAL INFORMATION

We may disclose your Personal Information to the following categories of parties for the following purposes:

- **Sedona affiliates.** We may disclose Personal Information to Sedona affiliates to manage job applications and/or identify potential job opportunities for your application(s).
- **Screening providers.** We may disclose Personal Information about you for pre-employment screening purposes, such as drug testing and customer reporting agencies, including background or credit checks.
- **Potential employers.** We may disclose your Personal Information with employers who have posted jobs on Sedona Compass.
- **Service providers.** We may disclose your Personal Information for our own marketing purposes or for other business purposes.
- **Business transfers.** We may disclose Personal Information in the event we sell or transfer all or a portion of our business assets (e.g., further to a merger, reorganization, liquidation, bankruptcy, or any other business transaction), including negotiations of such transactions.
- **Government authorities.** We may disclose Personal Information for legal compliance, law enforcement, and public safety purposes.
- **Law enforcement and emergency services.** We may disclose Personal Information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person.
- **To professional advisers.** We may disclose the Personal Information we collect from you to seek advice from lawyers, auditors, other professional advisers, or as evidence in litigation in which we are involved.

5. CALIFORNIA PRIVACY RIGHTS

If you are an Applicant, you have the right to submit certain requests relating to your Personal Information pursuant to the CCPA. To exercise any of these rights, please submit a request by emailing us at privacy@sedonagroup.com or as provided below.

If you make a privacy request, we may take steps to verify your identity before responding to your request. You may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. As permitted by law, we may take steps to verify your own identity in response to a request even if you choose to use an agent.

Right to Opt Out of the Sale and Sharing of Your Personal Information. We do not sell or share Applicant Personal Information.

Right to Know. You may request more information about:

- the categories of Personal Information we have collected about you;
- the categories of sources from which the Personal Information is collected;
- our business purpose for collecting or disclosing your Personal Information;
- the specific pieces of Personal Information we have collected about you; and
- the categories of Personal Information about you that we disclosed for a business purpose and the categories of recipients to which it was disclosed.

Right to Correct Inaccurate Information. If you believe that any of the Personal Information, we maintain about you is inaccurate, you may submit a request for us to correct that information. Upon receipt of a verifiable request to correct inaccurate Personal Information, we will use commercially reasonable efforts to correct the information as you direct.

Right to Limit Use and Disclosure of Your Sensitive Personal Information. We do not use or disclose sensitive Applicant Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

Right to Request Deletion of Your Personal Information. Applicants have the right to request that we delete Personal Information collected by us. Following receipt of a verifiable request to delete, we will let you know what Personal Information we can delete from our records. We will also notify our service providers and request that they delete your Personal Information.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of the privacy rights described above, consistent with California law, we will not retaliate against you for exercising your privacy rights.

6. RETENTION OF PERSONAL INFORMATION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information (which includes the categories of Personal Information set forth in the charts and sections above) for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal obligations, or as necessary to resolve disputes. To determine the appropriate retention period for Personal Information, we consider applicable legal requirements, the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes we process your Personal Information for, and whether we can achieve those purposes through other means. For certain types of Personal Information, we will only maintain it for a limited duration.

7. CONTACT US

You may contact us for more information or to exercise your privacy rights at:

Email: privacy@sedonagroup.com

Phone: 1-877-537-7350