

The Sedona Group California Privacy Notice

Effective Date: January 1, 2023

This California Privacy Notice ("CA Privacy Notice") is provided pursuant to the California Consumer Privacy Act (as amended, the "CCPA"), and describes how and why The Sedona Group Ltd., Sedona Staffing, Inc., Sedona Technologies, Inc., and Sedona Technologies Government Services LLC (collectively "Sedona," "we," "us," or "our") collects, uses, and discloses Personal Information of California consumers ("you"), the rights afforded to you by the CCPA, and how to exercise those rights. This CA Privacy Notice should be read in conjunction with all other policies that govern your relationship with us.

As used in this CA Privacy 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 California consumers. Personal Information does not include information that is publicly available, de-identified, or aggregated.

This CA Privacy Notice does not apply to Sedona's California workforce or California job applicants. If you are a current workforce member you may view your California workforce notice by emailing privacy@sedonagroup.com. If you interacted with us as a job applicant, your California job applicant privacy notice can be found here [California Consumer Privacy Act \(CCPA\) Applicant Notice](#). If you interact with us in other contexts and have questions about your privacy rights you can contact us at privacy@sedonagroup.com.

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

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

We collect, use, and disclose the categories of Personal Information indicated in the chart below. Note that the specific pieces of Personal Information we collect about you 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, or Disclosure
Identifiers , such as name, contact information, internet protocol (IP) address, online username, and other similar identifiers	<ul style="list-style-type: none">• To provide products and services• To enter into and execute agreements• To communicate with you• For advertising and marketing
Personal Records described in Cal. Civ. Code § 1798.80(e), including the identifiers described above and physical and electronic signature and financial information	<ul style="list-style-type: none">• To provide products and services• To enter into and execute agreements• To communicate with you• To develop our business and provide our services• To provide customer service• For advertising and marketing

Internet or Other Electronic Network Activity Information , such as information transmitted over the internet, including browsing history, search history, application usage information, information about any devices you choose to connect to our networks, including browser type and language, operating system, and internet or mobile network provider	<ul style="list-style-type: none"> • To provide customer service • To communicate with you • To develop our business and provide our services • For advertising and marketing • To manage safety and security of our websites, systems, and applications
Geolocation data , such as location data inferred from your IP address	<ul style="list-style-type: none"> • For advertising and marketing • To manage safety and security of our websites, systems, and applications
Sensory Information (Including Audio, Visual, or Similar Information) , such as photographs and videos of you (for example, security video recordings) or audio recordings (for example if you call customer service on a recorded line)	<ul style="list-style-type: none"> • To provide customer service • To communicate with you • To manage safety and security of our websites, systems, and applications
Professional or employment-related information , such as information relating to professional licenses, or information about your current employment that is relevant to your relationship with Sedona	<ul style="list-style-type: none"> • To provide products and services • To enter into and execute agreements • To communicate with you • To provide customer service
Other categories of Personal Information , such as languages spoken, or federal contractor status	<ul style="list-style-type: none"> • To provide products and services • To enter into and execute agreements • To communicate with you • To provide customer service

2. SOURCES OF PERSONAL INFORMATION

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

- **Directly from you**, throughout your interactions with us, including through our IT systems, company forms, and processes where you submit information to us.
- **Automatically when using our digital services or visiting our premises**, specifically, 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.
- **Service providers**. We may receive information about you from service providers, business partners or others.

3. 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 operations and/or identify potential job opportunities for you.
- **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.

4. SELLING AND SHARING OF PERSONAL INFORMATION

We do not sell Personal Information or share it for cross-context behavioral advertising.

5. CALIFORNIA PRIVACY RIGHTS

If you are a resident of California, 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. If you use an authorized agent to submit a request, we may require proof that the agent has been authorized by you to do so, and take other steps permissible under the CCPA, to ensure it is a proper request by an authorized agent. 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 Personal Information.

Right to Access. You may request access to:

- 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 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. You have the right to request that we delete Personal Information collected or maintained 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 to which we transferred your information about your request to delete.

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 BUSINESS CONTACT 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