



CALIFORNIA APPLICANT AND EMPLOYEE PRIVACY NOTICE AND POLICY

Dear Applicant / Employee,

Respecting the privacy of our applicants and employees is an essential part of our privacy program. We are committed to the proper handling of the Personal Information collected or processed in connection with your application for employment and, if you become an employee of Behavior Frontiers, your employment relationship with us. This disclosure describes categories of Personal Information we collect about our California-based applicants and employees and the purposes for which we collect, use, disclose, and otherwise process that information. Personal Information is defined as categories of information that identifies, relates to, describes or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household.

APPLICANTS

In connection with the recruiting process and your application for employment with us, we collect certain Personal Information about you, which may include the following categories A-F. While we typically collect this information from you as an applicant to Behavior Frontiers, we may also collect such information from other employees or third parties including references, recruiters, job-related social media sites, colleagues, clients, publicly available sources, and service providers, such as background check providers.

Categories of Personal Information Collected From Applicant	
Category A	Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers.
Category B	Personal Information, such as name, contact information, insurance policy number, education, employment, employment history, salary and other compensation information, and information needed to establish eligibility to work, including Visa information, drivers' license number, passport number. This also includes signature, physical characteristics or description, address, telephone number and email. This may also include drug testing information, including the forms submitted and the results of the drug test(s). This may also include any personal information a recruit or applicant chooses to share with Behavior Frontiers in the interview or application, including CV, resume, or other supporting documentation, or that the recruit or applicant makes publicly available.
Category C	Characteristics of protected classifications under California or federal law, such as sex, age, race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information, AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and requests for leave, to the extent you choose to provide this information.
Category D	Professional or employment-related information, such as work history and prior employer, professional licenses, certificates, or other qualifications, employment references or referrals, human resources data and data necessary for benefits and related administrative services.
Category E	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records, highest level of education, schools attended, degrees, transcripts, educational references, or any educational information that an employee chooses to share with Behavior Frontiers or that the employee makes publicly available.
Category F	Background check and reference check information, such as to verify professional and educational history and qualifications or identify criminal history that may be relevant for a position with Behavior Frontiers.

Personal Information is collected for the following purposes:

1. To comply with state and federal law and regulations;
2. To identify and evaluate job applicants and candidates for employment;
3. To obtain and verify background checks;
4. To verify information provided to us in connection with your application;
5. To facilitate the application and interview process;
6. To communicate with you regarding the status of your application; and
7. To anonymize and/or aggregate data to perform workforce analytics, data analytics, and benchmarking and budgeting.

If you accept an offer from Behavior Frontiers, we may transfer the Personal Information collected during the recruiting and application process to your personnel file and/or other internal or external systems used by the Company.

EMPLOYEES

If you become an employee of Behavior Frontiers, in connection with your employment with us, we collect certain Personal Information about you, which may include the following categories A-I. While we typically collect this information from you as a Behavior Frontiers employee, we may also collect such information from other employees, publicly available sources, or third parties that you may interact with as an employee, including clients, vendors, and service providers, such as background check providers, payroll providers, and benefits providers.

Categories of Personal Information Collected From Employee	
Category A	Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers.
Category B	Personal information, such as name, contact information, insurance policy number, education, employment, employment history, medical information and health information, salary and other compensation information, benefits information, tax reporting information, expense reimbursement information, drug testing information, including forms submitted and the results of the drug testing, and information needed to establish eligibility to work, including Visa information. This also includes signature, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, email address (personal and work), emergency contact information, license plate number, bank account and routing number, medical information, or health insurance information, including eligibility information and information about your family members under your benefits. This may also include any personal information an employee chooses to share with Behavior Frontiers or that the employee makes publicly available.
Category C	Characteristics of protected classifications under California or federal law, such as sex, age, race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information, AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and requests for leave, to the extent you choose to provide this information.
Category D	Internet or network activity information, such as browsing history and interactions with our website, applications or systems and passwords. This includes the content of communications sent through work-related devices and information systems.



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Category E	Geolocation data, such as device location.
Category F	Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities.
Category G	Professional or employment-related information, such as work history and prior employer, professional licenses, certificates, or other qualifications, employment references or referrals, human resources data and data necessary for benefits and related administrative services, hire date, employment location, department, supervisor, job title, hours and days worked, work restrictions, accommodations, performance reviews, and disciplinary records.
Category H	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records, highest level of education, schools attended, degrees, transcripts, educational references, or any educational information that an employee chooses to share with Behavior Frontiers or that the employee makes publicly available.
Category I	Background check and reference check information, such as to verify professional and educational history and qualifications or identify criminal history that may be relevant for a position with Behavior Frontiers.

Personal Information is collected for the following purposes:

1. To comply with state and federal law and regulations;
2. To process payroll;
3. To track time and attendance;
4. To manage workers' compensation claims;
5. To administer and maintain benefits, including group health insurance;
6. To administer and maintain retirement service;
7. To manage employee performance of their job duties, including promotions, discipline, and/or termination, and monitoring compliance with policies;
8. To communicate with employees to operate the business, including marketing;
9. To conduct workplace investigations;
10. To obtain and verify background checks;
11. To grant and monitor employees' access to secure company facilities;
12. To implement, monitor, and manage electronic security measures on devices that are used to access networks and systems (e.g., incident management);
13. To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company;
14. To maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance;
15. To anonymize and/or aggregate data to perform workforce analytics, data analytics, and benchmarking and budgeting;
16. To provide, validate, or communicate services offered by payroll and benefit providers directly to individuals; and
17. To apply for a company credit card.

We may collect contact information, benefits information, and other identifying information from family members in order to communicate about benefits, communicate in the event of an emergency, and comply with applicable law, including tax reporting.

DISCLOSURE OF PERSONAL INFORMATION

We may share the categories of Personal Information outlined above with the following third parties for the purposes described below:

Recruiters and Job Application Providers: We may engage recruiters and job application providers to assist us in identifying potential applicants. In order for these third parties to assist us, we may share Personal Information about potential and current employees with them.



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Background Check Providers: When permitted by law, we may choose to conduct a background check in connection with a job application, offer, or in connection with your employment. In order to facilitate the background check, we may share Personal Information with trusted background check providers.

Other Service Providers: We engage other third parties to perform certain functions on our behalf, including assisting us with benefits and services offerings and other related business operations, such as service provision and time tracking, payroll and tax withholding and reporting obligations. The service providers may process Personal Information on our behalf or have access to Personal information while performing functions on our behalf.

Business Transaction or Reorganization: If we were to be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or sale of company assets, we may disclose Personal Information to a third party during negotiation of, in connection with, or as an asset in such a transaction.

Legal Obligations and Rights: We may disclose Personal Information to third parties, such as legal advisors and law enforcement, in connection with the establishment, exercise or defense of legal claims, to comply with laws and regulations, to respond to lawful requests and legal process, to protect our rights and property and that of our agents, clients, and others, to protect the health and safety of us, our employees, our clients, or any other person, or as otherwise required by law.

Otherwise with Consent or Direction: We may disclose Personal Information to certain other third parties or publicly with your consent or direction.

SALES, SHARING, OR TARGETED ADVERTISING

We do not sell Personal Information about individuals acting in their capacity as employees or applicants, and we do not share or otherwise disclose Personal Information about individuals acting in their capacity as employees or applicants to third parties for the purposes of displaying advertisements that are selected based on Personal Information obtained, or inferred over time from an individual's activities across businesses or distinctly-branded websites, applications, or other services (known as "targeted advertising" or cross-context behavioral advertising").

OUR RETENTION OF PERSONAL INFORMATION

To determine how long to keep Personal Information, we consider various factors, including the amount, nature, and sensitivity of the Personal Information, the potential harm from unauthorized use/disclosure of the Personal Information, and our legal and regulatory obligations.

Generally, we retain Personal Information only as long as is necessary to serve the purpose for which the Personal Information was collected. If necessary, we may retain it longer, for instance if we are required to do so by legal requirements.

Once retention is no longer necessary, we will either delete the Personal Information or, if that is not possible, then we will securely store it until deletion is possible.

YOUR PRIVACY CHOICES

If you are a California resident, you may be able to exercise the following rights, subject to certain limitations under the law:

1. **The Right to Know:** The right to confirm whether we are processing Personal Information about you and obtain certain personalized details about the Personal Information we have collected about you, including the categories of Personal Information collected, the categories of sources of the Personal Information, the purposes for which the Personal Information was collected, the categories of Personal Information disclosed to third parties and the categories of recipients to whom the Personal Information was disclosed.



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2. **The Right to Access:** The right to obtain access to the Personal Information we have collected about you and, where required by law, the right to obtain a copy of the Personal Information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity.
3. **The Right to Correction:** The right to correct inaccuracies in your Personal Information, taking into account the nature of the Personal information and the purposes of the processing of the Personal Information.
4. **The Right to Deletion:** The right to have us delete the Personal Information we collect from you, taking into account the nature of the Personal Information and our need to comply with applicable law.

You also have the right to not be retaliated against or discriminated against in connection with any request to exercise the above rights. However, if the exercise of these rights limits our ability to process Personal Information, we may no longer be able to engage with you in the same way.

SUBMITTING PRIVACY RIGHTS REQUESTS

To submit a request to exercise one of the rights identified above, please: (1) call **888-922-2843**; or (2) send an email to **HR@behaviorfrontiers.com**. Before processing your request, we will need to verify your identity and confirm that you are a resident of California. To verify your identity, we generally require the matching of sufficient information you provide to information we maintain about you. In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf where we can verify the agent's authority to act on your behalf. To verify that authority, we generally require evidence of either a valid power of attorney or a signed letter containing your name and contact information, the name and contact information of the authorized agent and a statement authorizing the request. We may still need to separately reach out to you to confirm the agent's permission to act on your behalf and verify your identity.

If you have any questions about the collection and processing of your Personal Information or about the security of your Personal Information, please contact Human Resources.