



TALENTBURST EMPLOYEE AND JOB APPLICANT PRIVACY NOTICE REGARDING THE COLLECTION OF PERSONAL INFORMATION

Last modified: December 21, 2022

1. INTRODUCTION

TalentBurst, Inc. and its affiliates (“TalentBurst”, “we”, “us”, or “our”) adopts this Employee and Job Applicant Privacy Notice Regarding the Collection of Personal Information (“the “Privacy Notice”) to comply with the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”). Any terms defined in the CCPA or the CPRA have the same meaning when used in this Privacy Notice. Employees and job applicants with disabilities may access this Privacy Notice in an alternative format by calling TalentBurst at (508) 628-7500 or emailing privacy@talentburst.com. This Privacy Notice supplements the information contained in TalentBurst’s Global Privacy Policy, found at www.talentburst.com/privacy-policy.

TalentBurst is total workforce solutions provider, and as a global payrolling provider and employer of record, we collect and use personal information, including sensitive personal information, from employees, prospective employees, and job applicants for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance. TalentBurst respects your privacy and we are committed to handling and protecting your personal information responsibly and in compliance with applicable laws.

If you are not a TalentBurst employee, prospective employee, or job applicant, please review TalentBurst’s Privacy Notice for California residents. If you are an independent contractor based in California, please review TalentBurst’s Privacy Notice for California Independent Contractors.

2. CATEGORIES OF PERSONAL INFORMATION TALENTBURST COLLECTS AND HOW WE USE IT

TalentBurst collects and processes information, including what may be considered sensitive personal information, from employees, prospective employees, and job applicants for human resources, employment, benefits administration, health and safety, and business-related purposes, and where necessary to comply with local, state, and federal legal obligations. TalentBurst obtains the categories of personal information listed below directly from you and the





information you provide to us through the Website or the App. TalentBurst will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without first providing you with additional and/or updated notice.

Sensitive personal information is a subtype of personal information consisting of specific information categories. While we collect information that may be considered sensitive personal information under the CCPA, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a person.

TalentBurst does not sell the personal information we collect from our employees, prospective employees, and job applicants or share it with third parties for cross-context behavioral advertising.

Our Website and App collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, company, or device (collectively, "Personal Information"). We do not collect sensitive Personal Information on our Website or through our App. The table below also lists, for each category, our expected retention period, use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

Personal Information Category	Expected Retention Period	Business Purpose	Sold or Shared
Identifiers Examples: Name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, SSN, driver's license number, passport number, or other similar identifiers	7 years or until the individual opts out or deletion request received	TalentBurst collects identifies to respond to your questions or inquiries on our Website or through our App. For example, if you email us about an open position, we	Not sold. May be shared to our service providers to the extent necessary for the provision of





		will use your name and email address to respond to your question.	services on our behalf.
<p>California Customer Records personal information</p> <p>Examples: Name, signature, SSN, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	7 years or until the individual opts out or deletion request received	TalentBurst collects identifies to respond to your questions or inquiries on our Website or through our App. For example, if you email us about an open position, we will use your name and email address to respond to your question.	<p>Not sold.</p> <p>May be shared to our service providers to the extent necessary for the provision of services on our behalf.</p>
<p>Protected classification characteristics under California or federal law.</p> <p>Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, 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, genetic information (including familial genetic information).</p>	Not collected	Not collected	Not collected





<p>Commercial information</p> <p>Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	Not collected	Not collected	Not collected
<p>Biometric information</p> <p>Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	Not collected	Not collected	Not collected
<p>Internet or other similar network activity</p> <p>Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	7 years or until the individual opts out or deletion request received	TalentBurst collects interaction data with the Website / App and software to properly track usage, document acknowledgements or consents, and monitor usage.	Not sold. May be shared to our service providers to the extent necessary for the provision of services on our behalf.
<p>Geolocation data</p> <p>Examples:</p>	Not collected	Not collected	Not collected





Physical location or movement			
<p>Sensory data</p> <p>Examples: Audio, electronic, visual, thermal, olfactory, or similar information.</p>	Not collected	Not collected	Not collected
<p>Professional or employment-related information</p> <p>Examples: Current or past job history or performance evaluations.</p>	Not collected	Not collected	Not collected
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).</p> <p>Examples: 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</p>	Not collected	Not collected	Not collected
<p>Inferences drawn from other personal information</p> <p>Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>	Not collected	Not collected	Not collected





3. TALENTBURST'S DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

TalentBurst does not sell or otherwise disclose your Personal Information to any third parties for any monetary consideration.

We may, however, disclose your Personal Information to the following categories of recipients:

- TalentBurst Affiliates. TalentBurst may disclose your Personal Information to other TalentBurst entities to fulfill the purposes described in this Privacy Notice. Within TalentBurst entities, access to, use of, and other processing of Personal Information will generally be limited to individuals who have a need to know the information for the purposes described in this Privacy Notice, which may include personnel from: Human Resources, IT, Compliance, Legal, Information Security, and Finance and Accounting. Most personnel within TalentBurst will have access to your business contact information, such as name, position, telephone number, work address, and email address.
- External Service Providers. External Service Providers include but may not be limited to: (a) IT systems and support providers, account monitoring services, financial institutions, telecommunications providers, and insurance companies; (b) accountants, auditors, lawyers, and other outside professional advisors; (c) other third parties engaged to assist us in carrying out business, recruiting, or human resource activities; and (d) data verification services to ensure your data is accurate and to reduce errors. TalentBurst does not allow all third party service providers to use or disclose your Personal Information except as necessary to perform services on our behalf or to comply with legal requirements.
- Local Authorities. TalentBurst may share your Personal Information with local governmental, regulatory, supervisory, and/or judicial agencies or other public or official bodies, as permitted or required under applicable law.
- Business Investors. Your Personal Information may be disclosed to potential investors and their advisors, auditors, and legal counsel in connection with a corporate restructuring, sale or assignment of assets, merger, divestiture, or other changes of control or financial status of TalentBurst.
- Other Third Parties. Your Personal Information may be disclosed to third parties in circumstances where we are required to do so by law, regulation, or legal process (such as a court order or subpoena), or when we believe disclosure is necessary to achieve any purpose disclosed within this Privacy Notice.





4. CHANGES TO THIS PRIVACY NOTICE

TalentBurst reserves the right to update this Privacy Notice at any time and will provide you with a new Privacy Notice when and if any updates are made. If TalentBurst would like to use your previously collected Personal Information for different purposes than those it notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your Personal Information for a new or unrelated purpose. TalentBurst may process your Personal Information without your knowledge or consent only where required by applicable law or regulation.

5. CONTACT INFORMATION

If you have any questions or comments about this Privacy Notice or the TalentBurst Global Privacy Policy, please do not hesitate to contact us at

TalentBurst, Inc.
Attention: General Counsel
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