

About this California Applicant Privacy Notice

This privacy notice reflects the requirements of the California Consumer Privacy Act (CCPA) and is issued by the following companies which are referred to in this document as the “Companies” or “we”:

- INTO North America, Inc.

Each of the Companies and INTO as a global organization is committed to protecting the privacy and security of your Personal Information.

This privacy notice describes how we collect and use Personal Information about you when you apply to work with us, in accordance with the provisions of the CCPA, as well as other applicable privacy and/or data protection laws (Applicable Law). It applies to all applicants who are California residents.

This notice does not form part of any offer or contract of employment or other contract to provide services, nor does it imply or create any employment relationship, contract of employment, relationship to provide services, or contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using such information and what your rights are under the Applicable Law.

Definitions

- “Individual” means any identified or identifiable natural person.
- “Personal Information” means any information relating to an identified or identifiable Individual.
- “Process,” “Processed,” or “Processing” means any operation or operations performed on Personal Information or on sets of Personal Information, whether or not by automated means, including but not limited to use, collection, storage, alteration, disclosure, erasure, or destruction.

The kind of information we hold about you

As part of your applying to the Companies, we will collect, store and use the following categories of Personal Information about you:

- Personal Identifiers, such as your name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
- Internet or other electronic network activity information browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement.
- Audio, electronic, visual, thermal, olfactory, or similar information, such as body temperature.
- Professional or employment-related information, such as employment history and information regarding your work performance provided by references; education information, such as schools attended, degrees, GPA; and references.

How your Personal Information is collected

We collect Personal Information about you through the application and recruitment process, either directly from candidates or sometimes from a recruitment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or background check agencies.

How we will use information about you

We will only use your Personal Information when the law allows us to. Most commonly, we will use your information (the categories of data are listed above) in the following circumstances:

1. Where we need to comply with a legal obligation and in some cases
2. Where it is necessary for our business purposes or legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.

We may also use your Personal Information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

The situations in which we will process your Personal Information are listed below:

1. Making a decision about your recruitment or appointment.
2. Determining the terms on which you work for us.
3. Business management and planning, including accounting and auditing.
4. Assessing qualifications for a particular job or task.
5. Education, training and development requirements.
6. Dealing with legal disputes involving you.
7. Ascertaining your fitness to work.
8. Managing your requests for reasonable accommodations, including leaves of absence, such as FMLA leave or paid sick/parental leave.
9. Complying with health and safety obligations.
10. Responding to governmental inquiries or investigations, or other requests as required by law.
11. To prevent fraud.
12. To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
13. Equal opportunities monitoring.
14. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your Personal Information.

Change of purpose

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Information about Criminal Convictions

We will only Process information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations. We will do so in compliance with all legal obligations.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your Personal Information.

Questions

If you have any questions about this privacy notice or how we handle your Personal Information, please contact the Data Protection Officer, Veronica Morrison, at privacy@intoglobal.com.

Version Date: June 2020