

About this California Applicant Privacy Notice

Version Date: June 2026

INTO North America, Inc. is a global organization that complies with various data protection regimes around the world, including the California Consumer Privacy Act (CCPA). We are providing this CCPA-specific applicant notice ("California Applicant Notice") to supplement the information and disclosures in our [Privacy Notice](#), as well as our [Supplementary Privacy Notice for California Residents](#).

This California Applicant Notices 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. If you become an employee, please see our California Employee Notice for more information about how your Personal Information is processed throughout the duration or and following your employment.

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 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 that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with 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 work for us, 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.
- Characteristics of protected classifications, such as race, sex/gender, ethnicity, disability

information (if provided voluntarily), or military and veteran status.

- 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.
- Biometric or health information, such as 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.

Information about Criminal Convictions

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

Sources of your Personal Information

We collect Personal Information about you through the application and recruitment process from the following sources:

- Directly from candidates and from recruiters;
- Staffing companies;
- References;
- Former Employers;
- Online providers, such as through LinkedIn and similar online platforms;
- Government entities;
- Background checks;
- Professional employer organizations; and
- Social networks.

We do not collect all categories of Personal Information from each source.

How we will use information about you

The purposes we may Process your Personal Information include, but are not limited to, the following:

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. Where we need to comply with a legal obligation.
15. 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.
16. Where we need to protect your interests (or someone else's interests).
17. Where it is needed in the public interest or for official purposes.

Retention and change of purpose

We retain Personal Information for as long as necessary to fulfill the purposes for which we collected it, primarily to Process your application for employment. We may also retain your Personal Information to satisfy any legal, contractual, or reporting requirements that apply to us.

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.

Disclosure of Personal Information

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated Date of this California Applicant Notice and, for each category, categories of recipients to whom we disclosed Personal Information.

Categories of Personal Information	Categories of Recipients
Identifiers: Name, alias, postal address, unique personal identifier, online identifier, internet protocol	INTO Group companies & affiliates; Human Resources Platform Providers; Recruitment

address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Agencies
Education Information: Degrees, grade point average, and references	INTO Group companies & affiliates; Human Resources Platform Providers; Recruitment Agencies
Professional or employment-related information: Resume information, past and current job history, and performance information.	INTO Group companies & affiliates; Human Resources Platform Providers; Recruitment Agencies
Characteristics of Protected Classifications Under California or Federal Law: Race, national origin, sex, age, or disability.	INTO Group companies & affiliates; Human Resources Platform Providers; Recruitment Agencies
Biometrics or Health Information: electronic, visual, thermal, olfactory, or similar information, where necessary for interviews	INTO Group companies & affiliates; Human Resources Platform Providers; Recruitment Agencies
Internet or Other Electronic Network Activity Information: Browsing history, search history, information regarding a user's interaction with an INTO website, application or advertisement.	INTO Group companies & affiliates; Human Resources Platform Providers;

We do not knowingly sell or share the Personal Information of individuals we collect about applicants for employment or share it with third parties for cross-context behavioral advertising. We do not collect or process Personal Information for the purpose of inferring characteristics.

Your Rights

As a California resident, you have the following rights with respect to your Personal Information:

1. The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which we collected Personal Information, the business or commercial purpose collecting, selling, or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;
2. The right to delete Personal Information that we collected from you, subject to certain exceptions;
3. The right to correct inaccurate Personal Information that we maintain about you;
4. If we sell or share Personal Information, the right to opt-out of the sale or sharing;
5. If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and
6. The right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by the CCPA.

How to Submit a Request to Know, Delete, and/or Correct

To exercise your Right to Know, Data Portability, and Right to Delete, you must provide us with
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sufficient information to allow us to verify your identity and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Once we receive the information you provide to us, we will review it and determine if more information is necessary to verify your identity as required by law, and we may request additional information in order to do so. We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable.

To exercise your California privacy rights described above, please submit a verifiable request to us by:

- completing our [Online Rights’ Request form](#)
- emailing us at privacy@intoglobal.com

If you do not have a profile or if you are unable to access, control, or delete your information from within your profile, you can contact us through any of the above methods.

Only you, or a person authorized by you to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for Right to Know or Data Portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. We will need to verify your identity with at least 3 pieces of information, such as your full name, date of birth, address, application/student ID, email address, and/or phone number.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We may deny your request if we are unable to verify your identity or have reason to believe that the request is fraudulent.

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 INTO’s Data Protection Team at privacy@intoglobal.com.