

This is the Systems Planning and Analysis, Inc. (SPA) Privacy Notice for California employees (Notice). This Notice sets forth our privacy practices as required by the California Consumer Privacy Act of 2018 (CCPA). The Notice applies only to individuals residing in the State of California who are considered “Consumers” under the CCPA and from whom we collect “Personal Information” as described in the CCPA (“Consumers”). We provide you this notice because under the CCPA, California Residents who are job applicants, employees, or contractors of a Business qualify as Consumers. For purposes of this CCPA Employee Privacy Notice, when we refer to Consumers, we mean you to the extent you are a California employee, employee applicant, or contractor.

## Information We Collect

We may collect Personal Information from you in a variety of different situations, including, but not limited to on our website, your mobile device, through email, in physical locations, through the mail, and/or over the telephone. More specifically, SPA may collect the following categories of Personal Information from California job applicants, employees, or contractors, which will depend on the particular Business Purpose (described in the How We Use Personal Information below) for which we collect it:

Category	Examples of Personal Information that May Be Collected
A. Identifiers	A real name, alias, postal address, Internet Protocol address, email address, account name, Social Security number, driver’s license number, or passport number.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, medical information, or health insurance information.
C. Protected classification characteristics under California or federal law.	Age, race, color, 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 for same sex benefits, veteran or military status.
D. Commercial information	None.
E. Biometric information	None.
F. Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application.

G. Geolocation data	None.
H. Sensory data	None.
I. Professional or employment-related information	Current or past job history or performance evaluations.
J. Education information, as defined by the Family Educational Rights and Privacy Act	None.

Personal information does not include de-identified or aggregated consumer information.

SPA obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or services we provide you.
- Indirectly from you. For example, from observing your actions on our website or from information your computer or mobile device transmits when interacting with our website or mobile applications, among other things.
  - Third parties, including recruiters who submit your information to us for an employment position that may interest you and consumer reporting agencies for employment background checks.

## How We Use Personal Information

We may use or disclose the Personal Information we collect from you or about you to do one or more of the following:

- To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job or become an employee, we will use that personal information in connection with your employment or potential employment.
- To contact you and to inform you about benefits or information relating to your employment or potential employment.
- To provide, support, personalize, and develop our website and services relating to your employment or potential employment.
- To create, maintain, customize, and secure your information or account with us. To process your requests or transactions and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our systems, or Website, services, databases and other technology assets, and business.
- For research, analysis, and business development, including to develop and improve our business processes, Website and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA or subsequently agreed to by you.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SPA assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by SPA about our Consumers is among the assets transferred.

### **How We Share Personal Information**

SPA may disclose your Personal Information to a third party for a business purpose, including to our service providers.

We disclose and share your personal information with the following categories of third parties:

- Service providers
- Third parties with whom you direct us to share your personal information
- Third parties as part of our employment process such as consumer reporting agencies for employment background checks.

### **Disclosures of Personal Information for a Business Purpose**

In the preceding twelve (12) months, SPA has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category I: Professional or employment-related information.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. We do not disclose your Personal Information to third parties for their direct marketing purposes.

### **Changes to our CCPA Employee Privacy Notice**

SPA reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which SPA collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at Human Resources.