

VACO'S NOTICE AT COLLECTION AND PRIVACY POLICY FOR CALIFORNIA RESIDENTS

Effective Date: June 1, 2020 | **Last Revised on:** June 20, 2020 | **Last Reviewed on:** June 20, 2020

Vaco, LLC (“we,” “our,” or “Vaco”) respects your privacy and is committed to providing a transparent notice of our Notice at Collection and Privacy Policy for California Residents. This Notice and Privacy Policy for California Residents applies solely to those who reside in the State of California (“consumers” or “you”).

The purpose of this privacy notice and disclosure is to provide California residents, at or before the time we collect your personal information, with a comprehensive description of our online and offline practices regarding the collection, use, disclosure and sale of personal information and of the rights of consumers regarding your personal information:

- Notice at Collection
 - Notice at or before the point of collection, about the categories of personal information to be collected from you and the purposes for which the personal information will be used
- Your right to know about personal information collected, disclosed, used or sold including:
 - Categories of personal information we collected in the preceding 12 months
 - Categories of sources from which personal information is collected
 - Categories of personal information, if any, we disclosed or sold in the preceding 12 months
 - For each category identified as disclosed or sold, categories of third parties to whom the information was disclosed or sold
- Transparency that we do not sell your personal information
- Your right to request deletion of your personal information
- How to submit a verified consumer request for your Right to Know or Right to Delete
- How to use an authorized agent to submit a verified consumer request
- Your right to non-discrimination for the exercise of your privacy rights
- Other California privacy rights
- Changes to our privacy notice
- Our contact information

Notice at Collection and Privacy Policy for California Residents

Notice at Collection

The purpose of this Notice at Collection is to provide you with timely notice, at or before the point of collection, about the categories of personal information to be collected from you and the purposes for which the personal information will be used.

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Note that when you join our Talent Network or otherwise provide applicant information to Vaco you are directing us to disclose your personal information to our clients' organizations to match you with potential employment opportunities; by joining, you have not officially applied to a position

Do We collect?	Categories of Personal Information
<input checked="" type="checkbox"/>	<p>A. Identifiers: For example, a real 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.</p>
<input checked="" type="checkbox"/>	<p>B. Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, 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, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>
<input checked="" type="checkbox"/>	<p>C. Characteristics of CA or Federal Protected Classifications: Certain characteristics of protected classes may be collected on a voluntary basis on applications.</p>
<input type="checkbox"/>	<p>D. Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>
<input type="checkbox"/>	<p>E. Biometric Information: For example, physiological, biological or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>
<input checked="" type="checkbox"/>	<p>F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement</p>

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<input type="checkbox"/>	G. Geolocation Data: For example, information that can be used to determine a device's physical location
<input type="checkbox"/>	H. Sensory or Surveillance Data: For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household
<input checked="" type="checkbox"/>	I. Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files and current and past job history.
<input checked="" type="checkbox"/>	J. Education Information (<i>defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)</i>): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual's identity in relation to an educational institution either directly or indirectly through linkages with other information.
<input checked="" type="checkbox"/>	K. Profile Data: For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Please note that Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (CalFIPA), and the Driver's Privacy Protection Act of 1994.

We use the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided
- For our internal operation purposes
- For auditing relating to consumer transactions including ad impressions and compliance with regulations
- Fraud and security detection

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- Debugging to identify and repair errors
- Short-term data use for the current interaction that is not used to build a profile
- Servicing transactions and accounts (e.g., customer service, maintaining and servicing accounts, customer verification, payment processing) and providing services on behalf of business or service provider (e.g., financing, advertising or marketing, analytics)
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business
- To share the personal information with service providers to carry out other business purposes

We will not collect additional categories of personal information without providing you a new Notice at Collection disclosing those categories. We will not use your personal information for a purpose materially different from those disclosed in this Notice at Collection unless we directly notify you and obtain explicit consent to use it for the new purpose.

Privacy Policy

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of your rights regarding your personal information.

Your Right to Know

You have the right to request that we disclose what personal information we collect, use, disclose, and sell. You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

We collect personal information, which means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal information").

The following table includes disclosures for the preceding 12 months of: categories of personal information we have collected about consumers, the categories we have disclosed for a business purpose, and categories of third parties with whom we shared the personal information during that period.

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Category	In the preceding 12 months this category was:		Categories of third parties to whom the information was disclosed
	Collected	Disclosed	
A. Identifiers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers • Web hosting service providers • Financial and accounting service providers • Applicant Tracking System providers
B. Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers • Web hosting service providers • Financial and accounting service providers • Applicant Tracking System providers
C. Characteristics of CA or Federal Protected Classifications	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers
D. Commercial Information	<input type="checkbox"/>	<input type="checkbox"/>	
E. Biometric Information	<input type="checkbox"/>	<input type="checkbox"/>	
F. Internet or Other Similar Network Activity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers • Web hosting service providers
G. Geolocation Data	<input type="checkbox"/>	<input type="checkbox"/>	
H. Sensory or Surveillance Data	<input type="checkbox"/>	<input type="checkbox"/>	
I. Professional or Employment-Related Information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers • Web hosting service providers • Applicant Tracking System providers
J. Education Information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers • Web hosting service providers • Applicant Tracking System providers
K. Profile Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Cloud storage providers • Web analytics providers

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			<ul style="list-style-type: none">• Web hosting service providers• Financial and accounting service providers• Applicant Tracking System Providers
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The categories identified as collected in the table above were collected from the following categories of sources:

- You directly
- Job boards
- Internet service providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers

Vaco Does Not Sell Your Personal Information

We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

Your Right to Request Deletion of Your Personal Information

You have the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).

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- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information or for deletion. The request to know can be for any or all of the following:

- (1) Specific pieces of personal information that we have collected about you;
- (2) Categories of personal information we have collected about you;
- (3) Categories of sources from which the personal information was collected;
- (4) Categories of personal information that we sold or disclosed for a business purpose about you;
- (5) Categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- (6) The business or commercial purpose for collecting or selling personal information.

The response to a request for any of the categories above will cover the preceding 12 months. Please note that we are not required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You can submit requests using by calling 844-880-8226 or by e-mail to privacy@vaco.com. When submitting an e-mail provide your name, telephone number and e-mail address to allow us to verify your request. For a request to know, please include which request(s) you are making from options (1)-(6) above. We will verify your request by matching the information you provide to information that we have collected.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will either treat it as if it had been submitted in

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accordance with our designated methods or provide you with information on how to submit the request or remedy any deficiencies

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

If requests from you are manifestly unfounded or excessive in particular because of their repetitive character, we may either charge a reasonable fee or refuse to act on the request, notifying you of our reason for refusing to act. If we determine that the request warrants a fee, we will notify you of the reason for that determination and provide you with a cost estimate before completing your request.

Please note that, in responding to your request, we are not permitted to disclose or provide you with your Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. However, we will inform you with sufficient particularity that we have collected the type of information without disclosing the actual data.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

Using an Authorized Agent to Submit a Request

Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to provide the authorized agent signed permission to submit a request, verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

An authorized agent request can be submitted to privacy@vaco.com with the required documentation along with your name, telephone number, and e-mail address for verification.

Requests to Access or Delete Household Information

We will not comply with a request to know specific pieces of information or a request to delete household person information unless all consumer of the household jointly request access to

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specific pieces of information or deletion, we can individual verify all members of the household and we can verify each is currently a member of the household. If a member of a household is a minor under 13, we must obtain verifiable consent before complying with a request for specific pieces of information for the household or deletion of household personal information.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

You have a right not to receive discriminatory treatment by the business for the exercise of the privacy rights conferred by the CCPA. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other California Privacy Rights

Vaco does not respond to Web browser “do not track” signals or other mechanisms.

Other parties may collect personally identifiable information about your activities over time and across different Web sites when a consumer uses our Web site or service.

Changes to Our Privacy Notice

We reserve 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 the Website and update the notice’s effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

Contact for More Information

If you have any questions or comments about this notice, the ways in which we collect and use your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 844-880-8226

Website: <https://www.vaco.com/contact-us/>

Email: privacy@vaco.com

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Postal Address:

Vaco Global Headquarters
5501 Virginia Way #120
Brentwood, TN 37027

Attn: Vladimir Svidesskis, Director, Head of Security, Compliance & Risk, Vaco
