



**California Consumer Privacy Act – Notice for California Applicants, Employees and Contractors**

**Effective Date: January 1, 2024**

This notice (“Notice”) describes the categories of personal information that Unitek Learning Education Group Corp. and its subsidiaries (“Unitek”) collects from and about California residents who are applicants, employees, and contractors, the purposes for which Unitek collects and uses such information, how long we retain this information, and the rights you may have under the California Consumer Privacy Act (“CCPA”), as amended.

This Notice does not create or form part of any contract for employment or otherwise. For additional information about Unitek’s data privacy practices, please review our Privacy Policy.

**Categories of Personal Information Collected**

We may collect or have collected in the preceding 12 months the following categories of personal information:

**Identifiers.** For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, e-mail address, account name, Social Security number, driver’s license number, passport number or other similar identifiers.

**Personal information described in subdivision (e) of CA Civ Code Section 1798.80.** This category includes any information that identifies, relates to, or is capable of being associated with, a particular individual, including but not limited to names, physical characteristics or description, addresses, insurance policy number, Social Security numbers, driver’s license or state identification numbers, passport numbers, education, employment, employment history, signatures, bank account information, credit card numbers, debit card numbers, or any other financial information, medical information, or health insurance information. This does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

**Protected Classification Information.** This category includes characteristics of protected classifications under California or federal law.

**Internet or other Electronic Network Activity Information.** This category includes, without limitation,

- All activity on Unitek's information systems, such as internet browsing history, search history, intranet activity, e-mail communication, social media postings, stored documents and e-mails, usernames and passwords.
- All activity on Unitek's communication systems, including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile e-mail communications, and other information regarding an employee's use of Unitek issued devices.

**Geolocation Data.** This category includes GPS location from Unitek-owned or Unitek-issued devices, applications.

**Audio, Electronic, Visual, or Similar Information.** This category includes, for example, information collected from cameras and similar devices.

**Professional and Employment-Related Information.** This category includes, without limitation:

- Biological information, such as name, gender, date of birth, professional history, references, language proficiencies, education details, and information you make publicly available through job search or career networking sites.
- Data submitted with employment applications including job application, resume or CV, cover letter, writing samples, references, employment history, employment recommendations, whether you are subject to prior employer obligations, and information that referrers provide about you.
- Job preferences, such as desired position and compensation, location preferences and willingness to relocate.
- Information from the application process, such as any phone-screens, interviews, evaluations and outcomes of recruiting exercises
- Role/function information, such as a description of current role/function and services, campus/unit/department, location, terms of engagement as an independent contractor or through a staffing agency or other third party that employs you, contract start and termination date(s) and reason.
- Background check and criminal history to the extent permitted by applicable law.

- General employment information, such as department, work location, job title, dates of employment, work status (e.g., full-time/part-time), any terms or conditions of employment, work history (current, past, or prospective), timekeeping information, personnel and disciplinary records, training and learning program participation, information necessary to complete background checks, drug and/or alcohol tests, and other screens permitted by law, and other information reasonably necessary to administer the employment relationship with you
- Compensation, benefits and payroll information, such as salary and bonus details, benefits information (including information regarding health insurance, retirement savings), equity award information, bank account information and working time records (e.g., vacation and absence records, sick leave, leave status, and hours worked).
- Performance information, such as management metrics, performance evaluations and feedback, and promotion history
- Information about related persons, such as your spouse, domestic/civil partner, dependents, beneficiaries and emergency contacts
- Credentials, access and system information, such as your Unitek email address, usernames, passwords, and keycard number; information about your use of, as well as content and communications you send and receive through, devices, Unitek communications, IT systems and applications (e.g., time of use, files accessed, search history, web pages viewed, IP address, device ID, device location); and information about your access to offices and facilities (e.g., keycard scans and security camera footage).
- Expenses and travel information, such as information about your business travel and other business expenses
- Work authorization.
- Professional licenses such as licenses, permits, memberships, and certifications.
- Educational degrees
- Fitness for duty data and reports including information needed to understand and assess accommodation requests regarding potential disabilities or other health conditions.
- Benefit plan enrollment, participation, and claims information.
- Leave of absence information, including religious and family obligations, and physical and mental health data, concerning employees and their family members



**Education Information.** This category includes information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act. (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).

**Sensitive Personal Information.** This category includes:

- Social Security, driver's license, state identification card, or passport number
- Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- Precise geolocation
- Racial or ethnic origin
- Religious or philosophical beliefs
- Contents of your mail, e-mail, and text messages (unless Unitek is the intended recipient of the communication)
- Genetic information
- Biometric information for the purpose of uniquely identifying a consumer.
- Health information
- Information related to sex life or sexual orientation.

Unitek may add to the categories of personal information it collects and the purposes for which it uses that information. We will inform you in the event we do so.

Providing personal information to us is voluntary. However, if you do not provide sufficient information, we may be unable to consider your application, or if you are hired, we may be unable to consider your subsequent promotion, transfer, or relocation.

#### **Purposes Personal Information, Including Sensitive Personal Information, Is Used**

Unitek collects and uses personal information for the job application process, onboarding and managing the employment relationship, business-related purposes, and legal compliance. For example, we use your personal information for:

- Collecting and processing employment applications, including confirming eligibility for employment, background and related checks, onboarding and related recruiting efforts.
- Communicating with applicants about a current job application or future job opportunities.



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- Creating anonymous, aggregated or de-identified data that we use and share to analyze our application and recruitment activities, business and for other lawful business purposes.
- Processing payroll, other forms of compensation, and employee benefit plan and program design and administration including enrollment and claims handling and leave of absence administration.
- Maintaining occupational health programs.
- Maintaining personnel records and record retention requirements.
- Communicating with employees/contractors and/or their emergency contacts and plan beneficiaries.
- Complying with applicable state and federal health, labor, employment, benefits, workers' compensation, disability, equal employment opportunity, workplace safety and related laws, and guidance, or recommendations.
- Preventing unauthorized access, use, or disclosure/removal of Unitek's property, including Unitek's information systems, electronic devices, network, and data.
- Ensuring and enhancing employees/contractors' productivity and adherence to the Unitek's policies.
- Sharing your company biography to current and prospective students and other business contacts as part of our marketing activities.
- Providing training and development opportunities.
- Investigating complaints, grievances, and suspected violations of Unitek's policies.
- Complying with applicable state and federal Equal Employment Opportunity laws.
- Designing, implementing, and promoting Unitek's diversity and inclusion programs.
- Facilitating the efficient and secure use of Unitek's information systems.
- Ensuring compliance with Unitek's information systems policies and procedures.
- Improving safety of employees, students, and the public with regard to use of Unitek's property and equipment.
- Improving efficiency and logistics.
- Improving accuracy of time management systems and attendance, including vacation, sick leave, and other leave of absence monitoring.
- Evaluating an individual's appropriateness for a particular position at Unitek, or promotion to a new position.
- Conducting workplace investigations; establishing, responding to and managing legal claims against Unitek and/or its personnel, including civil discovery in litigation.

- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, merger and acquisition activities, and maintenance of licenses, permits and authorization applicable to Unitek's operations.
- Surveying employees/contractors to assist the organization with making benefit and employee engagement decisions.
- As required by applicable law.

**Sources of Personal Information.** We may collect your personal information from the following sources:

- **You.** We may collect personal information directly from you or your device, such as through your use of our website, facilities or systems, when you send us an email, contact us by phone, or otherwise communicate or interact with us as an applicant or during your employment.
- **Related Entities and Affiliates.** We may collect information about you from our related parties and affiliates.
- **Third parties.** We may collect information about you from third parties such as your references, educational institutions, background check vendors, staffing agencies, customers, or other third-party sources that are lawfully entitled to share your data with us. This may include service providers or contractors who collect or process your PI on our behalf.

**Disclosures.** To carry out the purposes outlined above, we may disclose your personal information to our affiliates, service providers and contractors (e.g., background check vendors, third-party staffing vendors, payroll processors, and information technology vendors), professional services providers and government entities.

We may also disclose your personal information to third parties, if necessary, to: (1) comply with federal, state, or local laws; (2) comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; (3) cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local laws; or (4) exercise or defend legal claims.

Lastly, we may transfer personal information to a third party as part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control or acquires all or part of the assets of our business.

We may disclose or have disclosed in the preceding 12 months the following categories of personal information to these categories of third parties:

<b>Categories of Personal Information</b>	<b>Categories of Third Parties to Whom Disclosed</b>
<p>Identifiers and personal information described in subdivision (e) of CA Civ Code Section 1798.80– such as your 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> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: Social Security number, driver’s license number, state identification card number, and/or passport number.</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Our business partners.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, payroll and benefits managers, background check vendors, training, expense management, medical/health, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p> <p>Governmental entities such as regulatory authorities and law enforcement.</p>





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	Professional services providers (e.g., attorneys, accountants, auditors, consultants).
<p>Protected status – such as citizenship, ethnic background, gender, or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial, ethnic, or national origin.</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, payroll and benefits managers, background check vendors, training, expense management, medical/health, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities such as regulatory authorities and law enforcement.</p> <p>Professional services providers (e.g., attorneys, accountants, auditors, consultants)</p>
<p>Internet or other electronic network activity – such as browsing history, search history, a consumer’s interaction with an internet website, application, or advertisement.</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: the contents of mail, email, or text messages,</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, training, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p>



<p>to which Unitek was not the intended recipient.</p>	<p>Governmental entities, legal service providers. We may disclose personal information to comply with the law. We may also disclose information if a government agency or investigatory body submits a request.</p>
<p>Geolocation data</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: precise geolocation.</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, shipping and fulfillment vendors, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities such as regulatory authorities and law enforcement.</p> <p>Professional services providers (e.g., attorneys, accountants, auditors, consultants).</p>
<p>Audio, electronic, visual or similar information.</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, payroll and benefits managers, expense management, shipping and fulfillment</p>

	<p>vendors, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities such as regulatory authorities and law enforcement.</p> <p>Professional services providers (e.g., attorneys, accountants, auditors, consultants).</p>
<p>Biometric Information</p> <p>NOTE: Biometric information is considered an element of Sensitive Personal Information.</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, payroll and benefits managers, background check vendors, expense management, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p>
<p>Education or professional and employment information, including veteran status or other similar identifiers.</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, payroll and benefits managers, background check vendors, expense management, shipping and fulfillment vendors, and data storage companies. We might also authorize our</p>

	<p>service providers to collect personal information on our behalf.</p> <p>Governmental entities such as regulatory authorities and law enforcement.</p> <p>Professional services providers (e.g., attorneys, accountants, auditors, consultants).</p>
<p>Sensitive information</p>	<p>Third parties as directed by you.</p> <p>Affiliates.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, information technology providers, payroll and benefits managers, background check vendors, expense management, shipping and fulfillment vendors, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities such as regulatory authorities and law enforcement.</p> <p>Professional services providers (e.g., attorneys, accountants, auditors, consultants).</p>



Unitek does not sell or share, as those terms are defined under applicable law, the above categories of personal information.

Unitek does not use or disclose your sensitive personal information for purposes that, with limited exceptions, are not necessary for the application or employment related purpose for which we collect it or as reasonably expected by an average individual in this context or for other permitted purposes under the CCPA or as authorized by regulation.

**Retention.** We retain your personal information for as long as is necessary in accordance with Unitek's data retention schedule. We may retain your personal information for longer if it is necessary to comply with legal or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law.

We may also retain your personal information in a deidentified or aggregated form so it can no longer be associated with you.

To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal information does not include certain categories of information, such as publicly available information from government records, and deidentified or aggregated consumer information.

**Children.** The Careers Site is not intended for minors under the age of 18.

**Third Parties.** This Notice does not address, and we are not responsible for, the practices of any third parties, which have their own rules for how they collect and use your personal information. Our links to third party websites or services are not endorsements.

**Your Obligations.** Among other obligations, including without limitation the obligation to provide complete and accurate information in recruiting documents and processes, it is your responsibility to ensure that information you submit does not violate any third party's rights. You should keep your personal information on file with Unitek up to date and inform us of any significant changes.

**California Resident Individual Rights Requests.** Individuals who are residents of the State of California have the following rights, subject to certain limitations.



**Right To Know About Personal Information Collected or Disclosed.** As a California resident, you have the right to request additional information beyond that disclosed above regarding the following, to the extent applicable:

- the categories of personal information Unitek collected about you.
- the categories of sources from which that personal information was collected.
- the business or commercial purposes for which that information was collected, sold, or shared.
- the categories of third parties to whom the information was disclosed.
- the specific pieces of personal information collected.

Upon receipt of a verifiable Request to Know (see below), and as required by applicable law, we will provide a response to such request.

**Right To Request Deletion of Your Personal Information.** You have the right to request that we delete the personal information we collected or maintain about you. Once we receive your request, we will let you know what, if any, personal information we can delete from our records and will direct any service providers and contractors to whom we disclosed your personal information to also delete your personal information from their records.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, without limitation, when the information at issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with Unitek and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

Upon receipt of a verifiable Request to Delete (see below), and as required by applicable law, we will provide a response to such requests.

**Right to Request Correction.** You have the right to request that Unitek correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it. Upon receipt of a verifiable Request to Correct (see below), and as required by the CCPA, we will provide a response to such requests.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** We will not discriminate or retaliate against you for exercising any of the rights described above.



**Submitting CCPA Rights Requests.** To submit a CCPA Rights request, please contact HR at [HR@unitek.com](mailto:HR@unitek.com).

We reserve the right to only respond to verifiable Requests to Know, Delete, or Correct that are submitted as instructed. A verifiable consumer request is one made by any individual who is:

- the individual who is the subject of the request,
- an individual on behalf of the individual's minor child, or
- the authorized agent of the individual.

**What to submit.** If we request, you must provide us with sufficient information to verify your identity and/or authority to act on behalf of the individual. In general, we may ask you to provide identifying information that we already maintain about you, or we may use a third-party verification service. In either event, we will try to avoid asking you for sensitive personal information to verify your identity. We may not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. We will not use the personal information we collect from an individual to determine a verifiable request for any other purpose, except as required or permitted by law.

**Our response.** We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request. We will endeavor to respond to a verifiable request within forty-five (45) calendar days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension.

**Authorized Agent.** You may authorize a natural person or a business (the "Agent") to act on your behalf. When you submit a Request to Know, Correct, or Delete, the Agent must provide proof that you gave the Agent signed permission to submit the request, and you either must (i) verify you own identity with Unitek or (ii) directly confirm with us that you provide permission to the Agent. However, these steps are not required when you have provided the authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.



**Spouses, Dependents, and Associates.** If you have knowledge that Unitek collected personal information related to your spouse, dependent, or associate, please share a copy of this notice with all such individuals.

**Changes to this Notice.** We reserve the right to amend this Notice at any time without advance notice. Any changes will become effective when we post the revised notice on our Careers Site. Please direct questions about this Notice by emailing [HR@unitek.com](mailto:HR@unitek.com).