



CALIFORNIA APPLICANT PRIVACY NOTICE

Last Updated: January 1, 2023

This California Job Applicant Privacy Notice (“Privacy Notice” or “Notice”) explains how Planned Companies, Inc. (“company,” “we,” or “us,” or “our”) collects personal information from job applicants who are California residents, to the extent the personal information is collected and used by us solely within the context of their status as a job applicant. This Notice supplements other privacy notices you may receive in connection with your relationship with us.

Personal Information We Collect and Have Collected in the Past 12 Months – Sources and Categories

In the 12 months preceding the date of this Notice, we collected your personal information when you applied for a position with us or otherwise voluntarily provided information to us. We will continue to collect personal information from the same sources.

The categories of personal information we collected from these sources during the 12 months preceding the date of this Notice, and will continue to collect, includes the following:

- **Personal identifiers:** name, address, email address, phone numbers
- **Professional information:** records of your work and education history (including internal and external work history and references)
- **Educational information:** Education history; trade school records; certificates obtained

Purposes for Collection of Personal Information

We use your personal information to evaluate your application for employment, to conduct job interviews, and to comply with applicable law.

Disclosure of Personal Information For Business Purposes in the Past 12 Months

The following chart describes the categories of personal information that we disclosed to third parties for a business purpose in the 12 months prior to the date of this Notice:

Categories of Consumers’ Personal Information	Categories of Third Parties With Which We Shared Personal Information for a Business Purpose
Personal identifiers: name, address, email address, phone numbers	Service providers that assist in facilitating email and text communications; assist with IT-related functions.

Additional Information About How We May Disclose Personal Information



We may also share your personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also share your personal information with third parties to help detect and protect against fraud or data security vulnerabilities. And we may share or transfer your personal information to a third party in the event of an actual or potential sale, merger, reorganization of our entity or other restructuring.

No Sale of Personal Information

We do not sell the personal information of job applicants.

Rights Related to Personal Information Held by Us

Your Right To Access Information We Collect and Share About You

We are committed to ensuring that you know what personal information we collect. To that end, you can ask us for the following information from us with respect to the personal information that we've collected about you in the 12 months prior to our receipt of your request:

- Specific pieces of personal information we have collected about you;
- Categories of personal information we have collected about you;
- Categories of sources from which such personal information was collected;
- Categories of personal information that the business sold or disclosed for a business purpose about you;
- Categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- The business or commercial purpose for collecting your personal information.

Your Right To Request Deletion of Personal Information We Have Collected From You

Upon your request, we will delete the personal information we have collected about you, except for situations where the CCPA authorizes us to retain specific information, including when it is necessary for us to perform human resource functions; for other internal uses; to maintain the functionality or security of our systems; or to comply with or exercise rights provided by the law.



Our Commitment to Honoring Your Rights

If you exercise any of the rights explained in this Privacy Notice, we will continue to treat you fairly.

Exercising Your Rights and How We Will Respond

To exercise your access or deletion rights, or to ask a question about your data subject rights, contact us at askHR@plannedcompanies.com.

For requests for access or deletion, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will then provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request under certain circumstances.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations.

In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavor to provide you with an explanation as to why.

Verification of Identity – Access or Deletion Requests

We will ask you for two pieces of personal information and attempt to match those to information that we maintain about you.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial.

Authorized Agents

You may designate an agent to submit requests on your behalf. The agent can be a natural person or an entity that is registered with the California Secretary of State.

If you would like to designate an agent to act on your behalf, you and the agent will need to comply with our verification process. Specifically, if the agent submits requests to access, know or delete your personal information, the agent will need to provide us with your signed permission indicating the agent has been authorized to submit the request on your behalf. We will also require that you verify your identity directly with us or confirm with us that you provided the agent with permission to submit the request.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.



Personal Information of Minors

We do not advertise our positions to minors and do not knowingly collect or sell the personal information of minors, including minors under 16 years of age.

How We Keep Your Personal Information Secure

We implement and maintain reasonable security appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. Our reasonable security program is implemented and maintained in accordance with applicable law and relevant standards. However, there is no perfect security, and reasonable security is a process that involves risk management rather than risk elimination. While we are committed to developing, implementing, maintaining, monitoring and updating a reasonable information security program, no such program can be perfect; in other words, all risk cannot reasonably be eliminated. Data security incidents and breaches can occur due to vulnerabilities, criminal exploits or other factors that cannot reasonably be prevented. Accordingly, while our reasonable security program is designed to manage data security risks and thus help prevent data security incidents and breaches, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security.

Changes to This Notice

We will review and update this Notice as required to keep current with rules and regulations, new technologies and security standards. We will post those changes on the website or update the Privacy Notice modification date below. In certain cases and if the changes are material, you will be notified via email or a notice on our website.

Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at askHR@plannedcompanies.com.

Contact Us

If there are any questions regarding this Privacy Notice or to request a copy of this Privacy Notice in another format you may contact us at askHR@plannedcompanies.com.