

PRIVACY RIGHTS NOTICE FOR CALIFORNIA JOB APPLICANTS, EMPLOYEES AND CONTRACTORS

Effective Date: January 1, 2023

Hibu Inc. (“Hibu”, “we”, “us” or “our”) is providing this **Privacy Notice for California Job Applicants, Employees and Contractors**, to notify you of our privacy practices as required by the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”). This notice contains disclosures required by the CCPA and CPRA and applies only to Personal Information that we collect from individuals applying for employment with Hibu or working as employees or contractors for Hibu. “Personal Information” means information that identifies, relates to, describes, references, is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular person or household. For purposes of this Notice, when we refer to “you” or “your”, we mean a California resident who is a job applicant of Hibu or a current or former employee or independent contractor of Hibu.

Hibu is committed to the responsible management, use and protection of your Personal Information. For more information about our privacy practices, see our [Privacy Policy](#) on our website, hibu.com.

CATEGORIES OF PERSONAL INFORMATION WE COLLECT

We may collect the following categories of Personal Information about our applicants, employees and contractors. We have provided examples of Personal Information that may be included within each category.

Category	Examples of Personal Information We Collect
Identifiers.	Name, alias, postal address, telephone number, mobile device ID, Internet Protocol address, email address, Social Security number, driver's license number, passport number
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, signature, Social Security number, 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
Protected classification characteristics under California or federal law.	Age, race, citizenship, marital status, medical condition, physical or mental disability, sex, veteran or military status, genetic information
Internet or other similar network activity.	Browsing history, search history, information on interaction with our websites and applications
Professional or employment-related information.	Current and past job history and performance evaluations, resumes, employee background checks

*Personal Information does not include deidentified or aggregated consumer information.

Sensitive Personal Information. Certain information we collect from applicants and/or employees is considered “Sensitive Personal Information” under the CCPA / CPRA, including government identifiers, such as Social Security Numbers and driver’s license numbers and information regarding racial or ethnic origin.

HOW WE USE PERSONAL INFORMATION

The Personal Information we collect from you or about you may be used for one or more of the following purposes:

- To respond to your inquiries and communicate with you about your application;
- To process your application;

- To assess your capabilities and qualifications for a job;
- To conduct reference checks;
- To conduct background checks if we offer you a position;
- To conduct drug screenings if we offer you a position;
- In connection with your employment or work as an independent contractor;
- To confirm your eligibility to work for Hibu under applicable law;
- To administer your compensation;
- To contact you and to inform you about benefits or information relating to your employment;
- To process your benefits elections and administer your benefits;
- To process claims made by you arising out of your employment;
- To facilitate travel for business purposes and to reimburse you for work-related expenses;
- To provide, support, personalize, and develop our services relating to your employment;
- 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 track hours worked, vacation and personal time and process leave of absence requests;
- To provide information to applicable Federal, State and local authorities as necessary;
- To respond to law enforcement requests and as required to comply with applicable laws, court orders, rules or governmental regulations;
- As required to ensure compliance with internal company rules and regulations;
- To preserve other legitimate interests, for example, for our administrative purposes, aggregate management reporting, internal training, to improve our business and as generally required to conduct our business;
- As described to you when collecting your personal information or subsequently agreed to by you.

Sale of Personal Information

Under the CCPA / CPRA, the transfer or sharing of Personal Information may constitute “selling” when such Personal Information is disclosed to a third party for monetary or other valuable consideration. Hibu does not “sell” any Personal Information of employees or contractors.

Sharing of Personal Information

Under the CCPA / CPRA, the transfer or disclosure of Personal Information may constitute “sharing” when such Personal Information is transferred or disclosed for purposes of targeted, or cross-contextual, advertising. Hibu does not share the Personal Information of applicants, employees or contractors for purposes of targeted advertising. Personal Information of applicants, employees or contractors is shared or made available only to our service providers or other third parties who need to access such information in order for us to process your application. When we disclose Personal Information to a service providers, we require the service provider not to use such Personal Information other than for the stated business purpose.

YOUR CALIFORNIA PRIVACY RIGHTS

The CCPA / CPRA provides California Consumers with specific rights regarding their Personal Information. This section describes such rights.

RIGHT TO ACCESS

Subject to certain exceptions, you have the right to request a copy of the Personal Information we collected about you during the 12-month period preceding your request. You also have the right to receive your Personal Information in a structured and commonly used format so that it can be transferred to another entity (“data portability”).

RIGHT TO KNOW

You have the right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or

commercial purposes for collecting Personal Information and the categories of third parties to whom we share or disclose it.

RIGHT TO DELETION

Subject to certain exceptions, you have the right to request that we delete your Personal Information. Upon verifying the validity of a deletion request, we will delete your Personal Information from our records, and instruct any service providers or third parties to delete your information, when applicable.

RIGHT TO CORRECT

In certain circumstances, you have the right to request correction of any inaccurate Personal Information. Upon verifying the validity of a verifiable consumer correction request, we will use commercially reasonable efforts to correct your Personal Information as directed, taking into account the nature of the Personal Information and the purposes of maintaining your Personal Information.

RIGHT TO OPT-OUT / DO NOT SELL OR SHARE MY PERSONAL INFORMATION

You have the right to opt out of the “sale” of your Personal Information, i.e., the transfer or sharing for monetary or valuable consideration. We do not “sell” the Personal Information of applicants, employees or contractors.

You also have the right to opt out from the sharing of your Personal Information for purposes of targeted advertising. We do not share the Personal Information of applicants, employees or contractors for such purposes.

RIGHT TO LIMIT USE AND DISCLOSURE OF MY SENSITIVE PERSONAL INFORMATION

You have the right to limit the use and disclosure of your Sensitive Personal Information to the purpose of providing you with services. We only collect, use and disclose Sensitive Personal Information of applicants, employees and contractors for purpose of processing your application or providing the employment related services noted above. Therefore, we are not required to provide you with the right to limit use of Sensitive Personal Information.

Non-Discrimination Rights

We will not discriminate against you for exercising any of your rights under the CCPA/CPRA.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

EXERCISING YOUR CALIFORNIA PRIVACY RIGHTS

To exercise the rights described above, please submit a verifiable request to us by either of the following methods:

- **Call us at 1-855-700-7303;** or
- **Click here to submit a request through our [Privacy Rights Request Form](#)**

Only you or a person authorized to act on your behalf may make a verifiable request related to your Personal Information. You may also make a verifiable request on behalf of your minor child.

You may make a verifiable request for information access not more than twice within any 12-month period. The verifiable 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 of such person; and
- include sufficient detail that allows us to properly understand, evaluate and respond to the request.

We cannot 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 related to you.

Making a verifiable request does not require you to create an account with us. However, if you have an account with us, we may require you to log-in to your account in order to verify your identity or authority to request access to or deletion of your Personal Information.

We will only use Personal Information provided in a verifiable request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable request within forty-five (45) days of our receipt of the request. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the date our receipt of your verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For requests to access your Personal Information, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity.

Retention of Your Personal Data

We store your Personal Information as reasonably necessary and proportionate to accomplish the purposes identified in this Notice and to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Contact Us. For any questions or concerns about Hibu's privacy practices, please contact us at Privacy.OfficerUS@hibu.com.