

# Privacy Notice

## USA DeBusk LLC

### 1. Introduction

USA DeBusk LLC and its affiliates (“we”, “us”, or “our”) respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. Pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”), we are required to provide California job applicants with a privacy policy that contains a comprehensive description of our online and offline practices regarding our collection, use, sale, sharing, and retention of their Personal Information (defined below) as well as a description of the rights they have regarding their Personal Information.

This California Job Applicant Privacy Notice (“Notice” or “Privacy Notice”) provides the information the CCPA requires as well as other useful information regarding our collection and use of Personal Information. This Notice applies to any California resident who applies for a job role, or who otherwise seeks to carry out work with or for us whether on a permanent or non-permanent basis (“applicant/s”, “you”, or “your”).

This Privacy Notice does not apply to individuals who are not California residents. This Privacy Notice also does not apply to our collection and use of your Personal Information in a consumer or business-to-business capacity. For more information on our collection and use of your Personal Information in that non-employment capacity, please see our general Privacy Notice at [www.usadebusk/privacy\\_notice](http://www.usadebusk/privacy_notice) . Finally, this Notice does not form part of any contract of employment or other contract to provide services.

We may update this Notice from time to time in response to changing legal, technical or business developments. When we update this Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. You can see when this Notice was last updated by checking the “last updated” date displayed at the top of this Notice.

### 2. Notice at Collection of Personal Information

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal Information does not include publicly available, deidentified, or aggregated information or lawfully obtained, truthful information that is a matter of public concern. For purposes of this Privacy Notice, we will refer to this information as “Personal Information.”

Personal Information Collected from You

Below are the categories of Personal Information we currently collect for purposes of providing employment opportunities and, in the 12 months prior to the latest version of this Privacy Notice, have collected from past and current applicants. Please note that the Personal Information we collect depends on the position for which you apply, what information you choose to provide, and what information we are required to collect. Not all Personal Information listed below is collected from all past and current applicants.

Identifiers and personal details: your name, email address, postal address, and telephone number;

Recruitment and selection information: your education information, professional or employment-related information (including employment history and previous applications to or employment with USA DeBusk);

Characteristics of protected classifications under California or federal law: your racial/ethnic origin; sex/gender; disability; citizenship or immigration status; and military or veteran status;

Sensitive Personal Information: Personal Information that reveals an individual's Social Security, racial/ethnic origin, gender and disabilities;

#### Sources of Personal Information

We collect Personal Information directly from you (California residents) and from background checks; recruiters; staffing companies; references; former employers; educational institutions; online providers (such as through LinkedIn and similar providers); government entities; employees; business partners; and social networks. We do not collect all categories of Personal Information from each source.

### 3. Purposes for Collection

We collect and use this Personal Information primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference checks or background checks (where applicable) and to generally manage the hiring process and communicate with you about it.

If you are accepted for a role at USA DeBusk, the information collected during the recruitment process will form part of your ongoing staff member record and will be processed in accordance with our California Employee Privacy Notice, which will be provided to you at the relevant time.

If you are not successful, we may still keep your application to allow us to consider you for other suitable openings within USA DeBusk in the future unless you request that we delete your application.

#### 4. Disclosure of Personal Information

We take care to allow access to Personal Information only to those who require such access to perform their tasks and duties, and to service providers who have a legitimate purpose for accessing it. Whenever we permit a trusted service provider to access Personal Information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the latest version of this Privacy Notice and, for each category, categories of recipients to whom we disclosed Personal Information.

Categories of Personal Information	Categories of Recipients
<b>Identifiers and personal details:</b> your name, email address, postal address, and telephone number	Applicant and recruiter software; background check service providers; employment agencies and employee training management services; government or law enforcement entities; human resource information systems; operating systems and platforms; data analytics providers; legal service providers; consultants and other professional advisors
<b>Recruitment and selection information:</b> your education information, professional or employment-related information (including employment history and previous applications to or employment with USA DeBusk LLC)	
<b>Characteristics of protected classifications under California or federal law:</b> your race or ethnic origin; sex/gender; disability; citizenship or immigration status; and military or veteran status	

We do not knowingly collect, sell, or share the Personal Information of individuals under 16 years of age.

Personal Information Retention

We will keep your Personal Information for as long as is needed to carry out the purposes we've described above, and as otherwise required by applicable law. Generally, this means where you become our employee, we will keep your Personal Information in accordance with the retention periods set out in our Employee Privacy Notice. Otherwise, after confirmation that your application was unsuccessful, for a period of 3 years unless you request that we delete your application.

## 5. Applicant Rights

If you are a California applicant, you have the following rights with respect to your Personal Information:

**The 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 we collected Personal Information, the business or commercial purpose for collecting, selling, or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;

**The Right to Delete:** You have the right to delete Personal Information that we collected from you, subject to certain exceptions;

**The Right to Correct:** You have the right to correct inaccurate Personal Information that we maintain about you;

**The Right to Opt-out of Selling or Sharing:** If we sell or share Personal Information, you have the right to opt-out of the sale or sharing;

**The Right to Limit Use of Sensitive Personal Information:** If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, you have the right to limit our use or disclosure; and

**The Right Against Discrimination:** You have the right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by the CCPA.

## 6. How to Exercise Your Rights/Update Personal Information

We will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California applicant on whose behalf you are making such request. We will verify your identity either to a "reasonable degree of certainty" or a "reasonably high degree of certainty" depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable. To do so, we will ask you to verify data points based on information we have in our records concerning you.

## 7. Our Process for Verifying a Request to Know, Delete, and/or Correct

We will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California applicant on whose behalf you are making such request. We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable. To do so, we will ask you to verify data points based on information we have in our records concerning you.

#### 8. Accessibility

We are committed to ensuring this Privacy Notice is accessible to individuals with disabilities. If you wish to access this Privacy Notice in an alternative format, please contact us as described below.

#### 9. Contact Us

If you have questions or concerns about this Notice or our privacy practices, please contact the USA DeBusk Privacy Policy team at [HRCorporate@usadebusk.com](mailto:HRCorporate@usadebusk.com).