

PRIVACY NOTICE TO CALIFORNIA WORKSITE EMPLOYEES

Workforce Business Services CA, LLC (“WBS” or “Company” or “we”) provide this California Privacy Notice (“Notice”) to describe our privacy practices with respect to our collection of Personal Information as required under the California Consumer Privacy Act (“CCPA”). This Notice applies only to worksite employees who are residents of the State of California and from whom we collect “Personal Information” as defined in the CCPA. If you are not a resident of California, you can disregard this notice.

Your employer (“Worksite Employer”) has entered into an agreement with WBS under which WBS provides Professional Employer Organization (“PEO”) services to the Worksite Employer. The PEO services provided by WBS typically include payroll processing, workers’ compensation coverage, and other services and/or benefits as may be selected by your Worksite Employer. As a worksite employee, you remain an employee of the Worksite Employer. WBS is not a joint employer with your Worksite Employer, and this Privacy Notice does not create an employment relationship between you and WBS.

1. Information We Collect From or About Worksite Employees

We may collect Personal Information from or about you in the course of providing services to your Worksite Employer, including information about your family members, dependents, and beneficiaries. We may at various times collect, receive, maintain, and use the following categories of Personal Information for any of the purposes listed below in this Notice and to the extent permitted under applicable law. The examples provided for each category are not intended to be an exhaustive list or an indication of all specific pieces of information we collect from or about you in each category, but rather the examples are to provide you a meaningful understanding of the types of information that may be collected within each category.

CATEGORY	EXAMPLES	RETENTION PERIOD
Personal Identifiers	Name, alias, social security number or equivalent, date of birth, worksite employee ID number, your employee ID number provided by your Worksite Employer.	Name and worksite employee ID number: Permanent. Otherwise, duration of employment with your Worksite Employer plus 6 years
Contact Information	Home, postal or mailing address, email address, home phone number, cell phone number.	Permanent
Protected Classifications	Race, ethnicity, national origin, sex, gender, sexual orientation, gender identity, religious or philosophical beliefs, age, physical or mental disability, medical condition, veteran or military status, familial status, language, or union membership.	Duration of employment with your Worksite Employer plus 6 years
Financial Information	Bank account number for direct deposit, or other financial account information.	Duration of employment with your Worksite Employer plus 6 years
Professional or Employment-Related Information	Information contained in your personnel file and in other employment documents and records, including information in onboarding records, I-9 forms, tax forms, time and attendance records, non-medical leave of absence records, workplace injury and safety records, performance evaluations, disciplinary records,	Duration of employment with your Worksite Employer plus 6 years, unless related to hazardous exposure records required

	investigatory records, training records, licensing and certification records, compensation and health benefits records, pension, retirement and 401(k) records, COBRA notifications, business expense records, and payroll records.	by OSHA to be retained for at least 30 years. We retain permanently a record of your name, last position held, and dates of worksite employment.
Family & Emergency Contact Information	Contact information for family members listed as emergency contacts and contact information for dependents and other dependent information.	Duration of employment with your Worksite Employer plus 6 years
Medical and Health Information	<p>Medical information contained in such documents as workers' comp. and injury records, doctor's reports of work restrictions, medical leave of absence records, requests for accommodation, interactive process records, ergonomic assessment and accommodation records, and correspondence with you and your medical or mental health provider(s) regarding workers' comp. claims or injuries and any request for accommodation or medical leave of absence, as well as information in post-accident drug test results received from our workers' comp. insurance carrier.</p> <p>This includes medical information and health benefits information for dependents and beneficiaries.</p>	Duration of employment with your Worksite Employer plus 6 years, unless related to hazardous exposure records required by OSHA to be retained for at least 30 years.

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information the Company may collect:

1. Personal Identifiers (social security number)
2. Protected Classifications (racial or ethnic origin, religious or philosophical beliefs, union membership, or sexual orientation)
3. Medical and Health Information

Personal information *does not* include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the worksite employee or from widely distributed media.
- Information made available by a person to whom the worksite employee has disclosed the information if the worksite employee has not restricted the information to a specific audience.
- De-identified or aggregated information.

2. How We Use Personal Information and Sensitive Personal Information

The Personal Information and Sensitive Personal Information we collect, and our use of Personal Information and Sensitive Personal Information, may vary depending on the circumstances. This Notice is intended to provide an overall description of our collection and use of Personal Information and Sensitive Personal Information. Generally, we may use or disclose Personal Information and Sensitive Personal Information we collect from you or about you for one or more of the following purposes:

1. To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to become a worksite employee, we will use that Personal Information in connection with your employment with your worksite employer or your relationship with us.
2. To assist the Company's customer (the Worksite Employer) to comply with local, state, and federal law and regulations requiring maintenance of certain records (such as wage and hour records, payroll records, accident or safety records, and tax records).
3. To comply with local, state, and federal law and regulations that apply to the Company.
4. To manage and process payroll.
5. To validate a worksite employee's identity for payroll and timekeeping purposes.
6. To maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
7. To manage workers' compensation claims.
8. To administer, manage, and maintain group health insurance benefits, 401K and/or retirement plans, and other Company benefits and perks.
9. To communicate with worksite employees regarding employment-related administrative matters such as upcoming benefits enrollment deadlines, action items, availability of W2s, and other alerts and notifications.
10. To implement, monitor, and manage electronic security measures on Company networks, software applications or systems, as well as on worksite employee devices that are used to access Company networks, software applications or systems.
11. To engage in corporate transactions requiring review or disclosure of worksite employee records subject to non-disclosure agreements, such as for evaluating potential mergers and acquisitions of the Company.
12. To assist in communications with a worksite employee's family or other contacts in case of emergency or other necessary circumstance.
13. To evaluate, assess, and manage the Company's business relationship with vendors, service providers, and contractors that provide services to the Company.
14. To detect security incidents involving potentially unauthorized access to and/or disclosure of Personal Information or other confidential information, including proprietary or trade secret information and third-party information that the Company receives under conditions of confidentiality or subject to privacy rights.
15. To protect against malicious or illegal activity and prosecute those responsible.
16. To prevent identity theft.
17. To verify and respond to consumer requests under applicable consumer privacy laws.

3. Retention of Personal Information

The Company will retain each category of Personal Information in accordance with our established data retention schedule as indicated above. Some of the retention periods in the retention schedule above are measured from a particular point in time that has not occurred yet, such as the end of worksite employment or end of a relationship (whether business, contractual, or transactional) plus a certain number of years. Where no particular event is defined in the retention schedule as the point from which the retention period is measured, we will measure the retention period from either (1) the date the record or data was collected, created, or last modified, (2) the date of the particular transaction to which the record or data pertains, or (3) another triggering event that is determined to be reasonable and appropriate based on the nature of the data and the legal/business needs for its continued use.

In deciding how long to retain each category of Personal Information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information was collected; relevant

federal, state and local recordkeeping laws; applicable statute of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

4. Sale/Sharing of Information to Third Parties

The Company does **not** and will not sell your Personal Information or Sensitive Personal Information for any monetary or other valuable consideration. The Company does **not** and will not share your Personal Information or Sensitive Personal Information for cross-context behavioral advertising.

5. Access to Privacy Policy

For more information, please review the California Worksite Employee Privacy Policy at www.gowbs.com.

By signing below, I acknowledge and confirm that I have received and read and understand this disclosure, and I hereby authorize and consent to the Company's use of the personal information and sensitive personal information it collects, receives or maintains for the business purposes identified above.

Worksite Employee's Signature

Date

Print Your Full Name