



Employee Privacy Notice

Effective January 2023

This Employee Privacy Notice (this “Notice”) details the Personal Data that CBT Nuggets, LLC (“Company” or “We”) may collect from workforce personnel including employees, interns, contractors, and applicants or candidates for the foregoing (individually an “Employee” and collectively “Employees”), how Company uses and safeguards that data, and with whom We may share it. This Notice is intended to provide notice to Employees regarding Personal Data in an effort to be compliant with the data privacy laws and regulations of the jurisdictions in which Company operates as well as compliance with its own Privacy Policy, available at www.cbtnuggets.com/privacy.

Definitions

- **Business/Controller**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. For purposes of this Notice, the Company is the Business/Controller.
- **Consumer/Data Subject**: an identified or identifiable natural person about whom Personal Data is collected. In the case of this Notice, the Data Subject is you, the Employee. For purposes of this Notice, Consumer and Data Subject may be used interchangeably.
- **Personal Information / Personal Data**: information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer/Data Subject, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, commercial information, employment information, education information, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. For purposes of this Notice, Personal Information and Personal Data may be used interchangeably.
- **Processing of Personal Data (“Process”)**: any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Sensitive Personal Data**: Personal Data that, if lost, compromised, or disclosed, could result in substantial harm, embarrassment, inconvenience, or unfairness to a Data Subject.
- **Service Provider/Processor**: a natural or legal person, public authority, agency or other body which Processes Personal Data on behalf of a Business/Controller. For purposes of this Notice, Service Provider and Processor may be used interchangeably.
- **Third Party**: a natural or legal person, public authority, agency or body other than the Employee, Company, Service Provider and parties who, under the direct authority of the Controller or Processor, are authorized to Process Personal Data.

Categories of Personal Data that We Collect

- Contact information (e.g., name, home and business addresses, telephone and mobile numbers, personal and business email addresses (including Company email address) and profile names, emergency contact information, etc.);
- Personal information (e.g., date of birth, marital status, birth place, nationality, self-identified ethnicity, gender, etc.);
- Employment, performance, compensation, and benefits (e.g., hire date, action/status codes, Company and system identification numbers, job title, position/grade, attendance, department, supervisor, worksite, projects, performance reviews, compensation rates and structure, awards, retirement, as well as family member/dependents names, dates of birth and social security numbers);
- Education and training (e.g., education level, field and institution; competency assessments; professional licenses and certifications; training courses);
- Social security number or other national identification number;
- Personal bank account information;
- Employment history and letters of recommendation;
- Online professional portfolios;
- Work restrictions and accommodations;
- Agreements that you enter into with Company;
- Computer or facilities access and authentication information;
- Grievance resolutions;
- Photographs and other visual images of you;
- In certain cases, your driver's license number, vehicle license plate number;
- In certain cases, your passport;
- In certain cases, your social security card; and,
- In certain cases, permits and visas.

The examples provided are not all-inclusive, and the Company also may collect similar or related information.

Sensitive data: (e.g., data that reveal race, ethnic origin, religious or philosophical beliefs, health, sexual orientation, political opinions, or trade union membership) are collected only where allowed or required by law and are used and disclosed only to fulfill legal requirements unless Employee provides consent for further collection or disclosure.

Certain information collected is required to establish the employment relationship. You may inquire at the time of collection as to whether certain information is required or optional to establish the employment relationship. Further, where permissible and as described in this Notice, you may inquire about correction or deletion of any information initially provided.

Categories of Sources from Which We Collect Personal Data

- Your job application materials, including your resume and portfolio;
- Information provided by references which you provide contact information for;
- Information provided by a staffing agency, as applicable;
- Information that you provide during the interview and application process;

- Information that you provide upon employment commencement, and throughout the course of your employment; and
- Information provided by third parties seeking verification of employment subject to your written authorization.

Purpose of Processing Personal Data

The collected Personal Data is Processed for Company's business purposes, including establishing, managing, or terminating your employment relationship with the Company. Such uses include:

- Determining eligibility for initial employment, including the verification of references and qualifications;
- Administering pay and benefits;
- Processing Employee work-related claims (e.g. worker compensation, insurance claims, etc.);
- Establishing training and/or development requirements;
- Conducting performance reviews and determining performance requirements;
- Assessing qualifications for a particular job or task;
- Gathering evidence for disciplinary action or termination;
- Establishing a contact point in the event of an emergency (such as next of kin);
- Complying with applicable labor or employment statutes;
- Compiling directories;
- Ensuring the security of Company-held information; and
- Such other purposes as reasonably required by the Company.

The uses provided are not all-inclusive, and Company also may collect similar or related information consistent with laws and regulations of a particular jurisdiction, and subsequent notice provided or posted as consistent with applicable legal requirements.

Categories of Third Parties the Company Discloses Employee Personal Data to

Company may disclose certain Personal Data with our Employees, Service Providers, state or federal agencies, consultants, and other parties on an as needed basis who require such information to assist us with establishing, managing, or terminating our employment relationship with you, including parties that (a) provide products or services to us or on our behalf or (b) collaborate with us in the provision of products or services to you. In some instances, such parties may also provide certain information technology and data Processing services to us so that We may operate our business. We may share Personal Data with such parties both in and outside of your home country, and, as a result, your Personal Data may be collected, used, Processed, stored, or disclosed in jurisdictions outside of your home state or country.

When Company shares Personal Data with such parties, our policy is to require that they only use or disclose such Personal Data in a manner consistent with the use and disclosure provisions of this Notice and consistent with the laws and regulations of the state and country where you live, as applicable to Company.

In addition, Personal Data may be disclosed or transferred to another party (including Third Parties) in the event of a change in ownership of, or a grant of a security interest in, all or a part of Company through,

for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Notice, unless you consent otherwise.

Further, your Personal Data may be disclosed:

- As permitted or required by applicable law or regulatory requirements. In such a case, We will endeavor to not disclose more Personal Data than is required under the circumstances;
- To comply with valid legal processes such as search warrants, subpoenas, or court orders;
- As part of Company's regular reporting activities to other parts of Company's enterprise to protect the rights and property of Company;
- During emergency situations or where necessary to protect the safety of a person or group of persons;
- Where the Personal Data is publicly available; or
- With your consent where such consent is required by law.

To a limited extent Company may need to collect Sensitive Personal Data, Company will ensure that the Employee is informed of such collection and Processing through notice provided at the outset of the Employee's employment with Company and at other times where required by law. Where required by law, the Data Subject's explicit consent to the Processing and particularly to the transfer of such Sensitive Personal Data to Third Parties will be obtained. Appropriate security and protection measures will be provided depending on the nature of the information and the risks associated with the intended uses.

Security and Data Integrity

Company will take commercially reasonable precautions to protect Personal Data in its possession secure against the risk of loss, misuse, unauthorized access, disclosure, alteration and destruction. Company periodically reviews its security measures in an effort to ensure the privacy of Personal Data.

Company will take reasonable precautions to ensure Personal Data is used only in ways that are compatible with the purposes for which the data was collected or subsequently authorized by the individual. While Company will take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete, and current, Company also relies upon you to assist in providing accurate updates of your Personal Data.

Consequences of Not Providing Your Data

You are not obligated to provide your Personal Data to Company, however, as this information is required for Company to employ you, We will not be able to offer employment or otherwise offer certain benefits without certain personal information.

How Long We Keep Your Data

Company only ever retains Personal Data for as long as is necessary and We have strict review and retention policies in place to meet these obligations. Specifically, Company retains Personal Data covered by this Notice for a period of 5 years following employment termination or rejection of job application, except as otherwise retained to comply with applicable laws.

Changes to this Notice

Company reserves the right to modify this Notice from time to time in order to accurately reflect the regulatory environment and our data collection principles. When material changes are made to this Notice, Company will provide Employees with subsequent notice where consistent with local laws or regulations.

Your Rights

You have the following rights regarding any of your Personal Data that Company Processes:

- Right to Access:
 - Where applicable, you have the right to data portability or to otherwise request a copy of your Personal Data in Company's possession.
- Right to Know¹:
 - What Personal Data We hold about you;
 - The purposes of the Processing;
 - The categories of Personal Data collected;
 - The categories of sources from which we collect Personal Data;
 - The recipients to whom the Personal Data has/will be disclosed; and
 - How long We intend to retain your Personal Data.
- Right to Correct:
 - If you believe that We hold any incomplete or inaccurate data about you, you have the right to ask Company to correct and/or complete the information and We will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.
- Right to Delete:
 - You have the right to request that Company deletes your Personal Data following the termination of employment or withdrawal or rejection of your job application, subject to Company's obligation to comply with applicable law.
- Right to Limit Use of Sensitive Personal Data:
 - You have the right to limit how, where and to whom Company discloses Sensitive Personal Data to the extent necessary for the Company's applicable business purposes, subject to Company's obligation to comply with applicable law.
- Right to No Retaliation:
 - The Company will not retaliate or discriminate against you for exercising any of their rights detailed in this Notice or provided by applicable law.
- Any other lawful request concerning the Processing of Personal Data as may otherwise be lawfully granted.

If We receive a request from you to exercise any of the above rights, We may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

¹ As disclosed in this Notice

Notice to California Employees

Company does not Sell or Share your Personal Information, as defined and detailed in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020, and any binding regulations promulgated after (“CPRA”).

Making a Request or Exercising a Right

Company only Processes your Personal Data in compliance with this Notice and in accordance with the relevant data protection laws. If, however you wish to make a request or exercise a right regarding the Processing of your Personal Data please contact:

General Counsel
CBT Nuggets, LLC
2850 Crescent Ave.
Eugene, OR 97401
United States
(541) 284-5522
legalteam@cbtnuggets.com

Nothing in this Notice should be construed to limit a Data Subject’s right of redress with the appropriate supervisory authority, ombudsman, or other relevant agency, authority, or public body.