



Privacy Notice to California Job Applicants

Effective date: January 1, 2023

1. Scope of This Notice

This notice is for California residents who apply for employment at Sentinel Offender Services, LLC (“Sentinel,” “us,” or “we”). It describes how Sentinel may collect, use and disclose your Personal Information in connection with considering you for a position of employment. It also explains related rights, and how you can exercise them, under the California Consumer Privacy Act of 2018, as amended (the “CCPA”). The CCPA broadly defines a “consumer” as a resident of California.

(You can read our general Privacy Policy [here](#). The Privacy Policy describes how we may collect, use and disclose your Personal Information if you interact with us outside of your capacity as a job applicant.)

When we say, “Personal Information,” we mean information that can reasonably be linked to a particular individual or their household. Generally speaking, your Personal Information includes your unique identifiers (full name, phone number, email address, username, etc.), and information about your characteristics, conditions or behavior that is associated with one of your identifiers or could otherwise reasonably be linked to you. “Non-Personal Information,” on the other hand, has been anonymized, aggregated or de-identified such that it cannot reasonably be linked to a particular individual or their household.

2. Personal Information We Collect and How We Collect It

Categories Collected

- **Identifiers**, such as your full name, signature, home address, phone number and email address
- **Demographic Information**, such as your age, gender, date of birth, race, ethnic origin, current and past citizenship status, marital status, disability and veteran or military status. Demographic information may include legally protected classifications.
- **Professional or Employment Information**, such as your current employment information, job title, position, hire dates, salary expectations, visa sponsorship needs, work authorization status, work history, academic and professional qualifications, references, interview notes
- **Education Information**, such as your transcripts and other educational records

- **Social Media and Online Information**, if you choose to provide it, as well as any other information about you that is publicly available on the internet
- **Internet or Network Activity**, such as data about your interactions with our online job applications
- **Background Check Information**, which is information gathered as part of a background check conducted on our behalf for safety and security purposes, and may include criminal records

Sources and Methods of Collection

We may collect Personal Information from you, including when you submit an online or paper job application and any associated documents, such as a cover letter or resume, and in the course of subsequent communications and/or interviews following submission of your application. We may also collect Personal Information via automatic means, such as Internet or Network Activity when you interact with our recruiting system, or an application portal maintained by us or by a vendor on our behalf. We may also receive Personal Information from third parties, with your consent, where required by law, such as through a background, employment, or reference check; from a recruiter; from a staffing agency; or from public sources such as LinkedIn.

3. How We Use Applicant Personal Information

We may use your Personal Information for the following purposes:

- To process your application for employment
- To communicate with you about the recruitment process and your application
- To take steps necessary to establish an employment relationship with you
- To secure our network, online applications or recruitment channels against fraud or malicious activity
- To comply with our legal obligations
- To analyze or improve our application and recruitment process
- In any other way we may describe when we collect the information; and
- For any other purpose with your consent.

We may use Non-Personal Information for any purpose.

4. Data Retention

Typically, we retain job applicants' Personal Information for the period necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes.

5. Sale, Sharing or Disclosure of Applicant Personal Information

Under the CCPA, you can request to opt-out of the “Sale” of your Personal Information—which the CCPA defines very broadly to include some transactions or arrangements that do not involve the exchange of data for money—and the “Sharing” of your personal information, which the CCPA defines as sharing with third parties for purposes of cross-site targeted advertising. We don’t Sell or Share job applicant Personal Information.

Within the past 12 months, we disclosed the categories of Personal Information collected for business purposes to service providers.

In addition to disclosing your Personal Information to service providers who support our recruitment processes, we may disclose your Personal Information in the following contexts:

Mandatory Disclosures and Legal Proceedings

We may have a legal obligation to disclose Personal Information to government authorities or other third parties pursuant to a valid regulatory request, subpoena, or court order. We may also need to disclose and otherwise process your Personal Information in accordance with applicable law to prevent physical harm or financial loss, protect the vital interests of a person, enforce our various policies or terms of use, protect our property, services, and legal rights, prevent fraud, support auditing, compliance and corporate governance functions, or comply with applicable law.

Change In Control or Merger

We may transfer your information in the event of the sale of substantially all of the assets of our business to a third-party or in the event of a corporate merger, consolidation, acquisition or reorganization. However, in such an event, any acquirer will be subject to the provisions of our commitment to you, or we will not disclose your information.

With Your Direction or Consent

We will share your Personal Information with other third parties as you may direct or otherwise consent.

6. Your Rights as a Californian

Consumers (California residents) have the right to make the following requests to covered businesses. The requests may be made by a consumer, by a consumer on behalf of the consumer’s minor child, or by a person authorized by the consumer to act on the consumer’s behalf. Sentinel may decline to honor any request if doing so would conflict with its rights or

obligations under applicable law, including but not limited to California or federal employment law or regulations.

Right To Request Information About Collection, Disclosure, Sale or Sharing

You have the right to request that a business disclose to you: (i) the categories and specific pieces of Personal Information the business has collected about you within the past 12 months, (ii) the categories of sources from which the Personal Information is collected, (iii) the business or commercial purposes for collecting, Selling or Sharing Personal Information, and (iv) the categories of third parties to whom the business discloses Personal Information.

If a business Sells or Shares Personal Information, or discloses it for a business purpose, you also have the right to request that the business disclose the following with respect to the 12-month period preceding your request: (i) the categories of Personal Information that the business Sold or Shared about you and the categories of third parties to whom the Personal Information was Sold or Shared, and (ii) the categories of Personal Information that the business disclosed about you for a business purpose.

This type of request may be referred to as a “Request to Know.” Before we can honor a Request to Know, we need to verify that the person making it is the consumer whose Personal Information we have. Our method for verifying any particular request weighs information we receive as part of the request, the sensitivity of the consumer information at issue, and the risk of harm to the consumer from unauthorized disclosure.

Right to Request Deletion

You have the right to request that a business delete any Personal Information that the business has collected from you. This type of request may be referred to as a “Request to Delete.”

Before we can honor a Request to Delete, we need to verify that the person making the request is the consumer whose Personal Information we have. Our method for verifying any particular request weighs information we receive as part of the request, the sensitivity of the consumer information at issue, and the risk of harm to the consumer from unauthorized deletion.

We are not required to delete Personal Information if we still need it in order to perform a contract with you, comply with a legal obligation, enable internal uses that are consistent with the context in which you provided the information, or accomplish any other objective recognized as an exception to the right to deletion under applicable law.

Right to Request Correction

You have the right to request that a business correct inaccurate Personal Information about you. This type of request may be referred to as a “Request to Correct.”

Right to Opt-Out of Sale or Sharing

You have the right to direct a business that Sells or Shares Personal Information about you to third parties not to Sell or Share your Personal Information. This type of request may be referred to as a “Request to Opt-Out.”

Right to Limit Use and Disclosure of Sensitive Personal Information

If a business collects Sensitive Personal Information* for the purpose of inferring characteristics about you, you have the right to request that the business limit its use and disclosure of your Sensitive Personal Information to that use and disclosure which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such goods and services. (Sentinel does not collect Sensitive Personal Information for the purpose of inferring characteristics about you within the meaning of the CCPA.)

*Sensitive Personal Information includes social security number; driver’s license or state identification number; complete account log-in credentials; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a consumer’s mail, email and text messages (unless the business is the intended recipient of the communication); genetic data; biometric information; health information; and information concerning sex life or sexual orientation.

Right to Non-Discrimination

You have the right not to receive discriminatory treatment by a business for the exercise of your privacy rights under the CCPA.

7. How To Exercise Your Rights with Sentinel

How to Submit a Request To “Know,” “Delete” or “Correct”

You can submit a Request to Know, Delete or Correct to privacy@sentineladvantage.com. The request must state “CCPA Request” and include:

- your first and last name.
- an email address at which you can be reached for the purposes of the request.
- the date and manner in which you applied for a position.
- the California county in which you reside.
- for a Request to Know, the disclosure(s) you are requesting.
- for a Request to Delete, a clear statement that you want us to delete your Personal Information; and
- the reason(s) you believe we have collected, disclosed, or sold your Personal Information, specifically, within the past 12 months (for example, you purchased a product or received a communication from us)

If you are submitting a request on behalf of a job applicant as their authorized representative, you must include the foregoing information about the consumer and provide proof of permission from the consumer to make the request.

After confirming receipt of your request, we'll contact you if we need more information in order to verify it. If we can't verify a request, we may deny it.

8. Changes To This Notice

We reserve the right to update or change this Notice or our Privacy Policy at any time and you should check them periodically. If we make any material changes, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

9. Contact Us

If you have any questions or concerns about this Policy, please contact us via privacy@sentineladvantage.com.