

PRIVACY NOTICE TO CALIFORNIA JOB APPLICANTS
REGARDING THE COLLECTION OF PERSONAL INFORMATION

Effective Date: December 31, 2020

Constella Intelligence, Inc. and its operating groups, subsidiaries and affiliates (the “Company,” “us” or “we”) are committed to protecting the privacy and security of the personal information you provide to us. Please read this Job Applicant Privacy Notice (the “Privacy Notice”) to learn how we collect and process your personal information when you apply for a job or other role with us. As a job applicant, you have the right to know and understand the categories of personal information we collect about you, and the purposes for which we use such personal information, pursuant to the California Consumer Privacy Act of 2018 (the “CCPA”). This Privacy Notice only applies to job applicants who are residents of the State of California. The Company does not sell or otherwise disclose this personal information for monetary or other consideration to any third parties.

Categories of Personal Information Collected

In each case as permitted by applicable law, we collect the following categories of personal information for the purposes described below:

- **Personal identifiers**, such as your name, preferred name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, date of birth, and other similar identifiers.
- **Personal Records**, such as your signature, Social Security number, address, telephone number, education, employment or employment history.
- **Protected characteristics**, such as minority, veteran and disability status, through voluntary self-disclosure. Such information will only be collected as permitted by applicable law and will not be used to make hiring decisions.
- **Internet or other similar network activity information**, such as your IP address, log-in information or information regarding your interaction with a website, application or advertisement.
- **Geolocation Data**, such as IP addresses from which we can determine your general location.
- **Sensory data**, such as audio and visual information, for example if you use video interviewing as part of the application process. If you visit our facilities, your entry and exit may be monitored by CCTV.
- **Professional or employment-related information**, such as your work history, references, information about skills and abilities, accomplishments and awards, training and development information, performance evaluation information, and employment termination information.
- **Education information**, such as your education history, education records (such as grades, transcripts and class lists), and other information included in your resume or cover letter.
- **Inferences drawn from other personal information**, such as a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.
- **Other**: Job interview notes, responses to screening questions, assessment results, and any other information you provide in connection with the recruitment process. We also collect legal and contractual information, such as information necessary to respond to law enforcement and governmental agency requests, comply with legal and contractual obligations, exercise legal and

contractual rights, and initiate or respond to, or establish, exercise and defend, legal and contractual rights claims.

Sources of Personal Information

We collect personal information you voluntarily provide to us when you apply for a job or otherwise contact us in the recruitment context. If you are visiting our website or online job application, we may also automatically collect device information such as IP addresses and device identifiers.

We may also combine personal information collected from other sources with the personal information that you provide to us. For example, we may collect information from:

- Recruiters
- Prior employers (e.g., for references)
- Professional references you provide to us
- Educational institutions
- Pre-employment screening services
- Credentialing and licensing organizations
- Publicly available sources such as your social media profile (e.g., LinkedIn, Twitter and Facebook)
- Other sources as directed by you

Use of Personal Information

We use the categories of personal information listed above for the following purposes:

- **Process and manage your application:** We use your personal information to process your job application, establish a job applicant profile for the recruitment process, assess your qualifications for a specific role with us, schedule and conduct interviews, communicate with you, and carry out background and reference checks (see the following bullet point for additional information). We may collect audio and visual information of job applicants through photographs used for identification purposes. With your consent, we may record video of you in connection with the application process, for example through a third party screening service. Additionally, if you are offered a position with us, we may use your personal information in the employee on-boarding process.
- **Conduct reference and background checks (as permitted by applicable law):** We use personal information we collect to conduct reference checks and to evaluate your qualifications and experience. We may also conduct background checks (as authorized by you and permitted by applicable law).
- **Provide immigration support:** If applicable and as permitted by applicable law, we may collect your personal information to assist with immigration support, such as applying for visas or work permits.
- **Analyze and improve our recruitment process and tools:** For example, we analyze trends in our applicant pool, and use personal information to understand and improve our recruitment process and tools (including improving diversity and inclusion). If you use our online job application process, we may collect personal information during the online application process.
- **Record-keeping:** We keep records of your personal information as required by law and in accordance with our record retention policies.

- **Meeting legal requirements and enforcing legal terms:** We collect and process your personal information for purposes of: fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities; protecting the rights, property or safety of you, us or another party; enforcing any agreements with you; responding to claims; and resolving disputes. Additionally, we may use information about protected characteristics to analyze and monitor the diversity of our job applicants in accordance with applicable laws.

Disclosure of Personal Information

We may share your personal information as necessary for the purposes described in this Privacy Notice, including internally with our personnel involved in the hiring process. For example, we share your personal information with the following parties:

- **Affiliates:** We may share your personal information with our affiliates.
- **Service Providers:** We use service providers to operate, host and facilitate our hiring and recruitment process. These include hosting, technology and communication providers; security and fraud prevention consultants; analytics providers; background and reference check screening services; and hiring process management tools.
- **Government authorities and law enforcement:** In certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- **Business transfers:** Your personal information may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).
- **Professional advisors:** We may share your personal information with our professional advisors.
- **Other:** We may also share your personal information with third parties in conjunction with any of the activities set forth under “Meeting legal requirements and enforcing legal terms” in the “Use of Personal Information” section above.

Contact for Questions

If you have any questions or concerns regarding this Privacy Notice or the collection of your personal information, please contact Rachel Fink, Head of Human Resources. Job applicants with disabilities may access this notice in an alternative format by contacting rachel.fink@constellaintelligence.com.