

## **DISCLOSURE TO JOB APPLICANTS PURSUANT TO THE CALIFORNIA CONSUMER PRIVACY ACT (CCPA)**

*Last Updated August 2023*

This Job Applicant Notice describes how Challenged Athletes Inc. (“CAF,” “we,” “us,” or “our”) processes personal information (“PI”) of California job applicants in our recruiting process. This Job Applicant Notice is designed to meet obligations under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, the “CCPA”). In the event of a conflict between any other organizational policy, statement, or notice and this Job Applicant Notice, this Job Applicant Notice will prevail as to California job applicants, unless stated otherwise.

As part of your job application and the CAF’s evaluation of your candidacy, the organization may collect, receive, maintain, and use the following types of Personal Information about you:

- Name, alias, postal or mailing address, email address, telephone number
- Application, resume, job interview notes, candidate evaluation records, professional and other work-related licenses, permits, and certifications, any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, and desired salary)
- Information regarding prior job experience, position held, names of prior supervisors
- Transcripts or records of degrees and vocational certifications obtained, background check results, social security number, driver’s license or state identification card number, passport number

Under the California Privacy Rights Act (“CPRA”), the following information are also defined as sensitive personal information: precise geolocation, social security number; driver’s license number, state identification card number, passport number, account log-in/financial account/debit card/credit card number in combination with any required security or access code, password, or credentials allowing access to an account, and the contents of a consumer’s mail, email and text messages, unless the business is the intended recipient of the communication.

We collect information directly from you when you choose to provide it to us by filling out forms or surveys, participating in an interview or other components of the applicant process, or otherwise directly providing the information to us. Depending on the stage of an application, in addition to the information you provide to us, we may obtain information about you from other third parties, such as platforms used to collect application information, recruiters, references, former employers, and law enforcement agencies.

We collect and use your personal information for the following business or commercial purposes, consistent with and only as permitted by applicable law:

- Considering job applicants for current and potential future employment opportunities and assess their skills, qualifications, and interests against our career opportunities.
- Evaluating a job applicant’s employment application, corroborating the information contained in the application and any supporting documents, and (where applicable) conducting employment related screening and background checks. (Please note, we only use background information as permitted by applicable law.)

- Scheduling job applicants for interviews and communicate with them about their application and employment opportunities.
- Aggregating data for CAF's diversity, equity, and inclusion objectives.
- Complying with state and federal laws and regulations governing the employment process and maintaining records pursuant to such laws and regulations.
- Communicating with job applicants about their candidacy.
- Keeping records of our interactions and communications with job applicants.
- Protecting our operations, rights, privacy, safety or property, or that of our affiliates, job applicants, or other parties.
- For any other purposes that we disclose to you at the time of collection.

#### Disclosure of Personal Information

As indicated above, we may disclose some of the personal information with third-party vendors as necessary for our business purposes. For example, such vendors could include the agencies we use to conduct pre-employment screening (such as background checks). From time to time, CAF may also be required to disclose your information to governmental authorities for the purpose of complying with applicable laws and regulations or in response to legal process.

CAF uses Paylocity recruiting platform to collect candidate applications. Please review their privacy policy here: [Paylocity Applicant Privacy Policy](#)

#### Sale or Sharing of Personal Information

In the past 12 months, CAF has not “sold” any categories of personal information, or “shared” any such information for the purposes of cross-context behavioral advertising and does not plan on doing so.

#### Applicable Retention Periods

For each category of personal information identified above, CAF will only retain such information only for as long as necessary to fulfill your requests or the purposes for which it was obtained, as set forth in this Notice. The criteria used to determine our retention periods include (i) for as long as we have an ongoing relationship with you, (ii) as required by a legal obligation to which we are subject, and (iii) as necessary to resolve any disputes or enforce our legal agreements with you.

#### Your Rights Under the CCPA

The CCPA provides California residents with the rights discussed below. For convenience, and as required by the CCPA, we explain how you can exercise those rights, to the extent they are applicable.

1. Right to Request Information. You have the right to request that we disclose certain information about our collection and use of your personal information during the past twelve (12) months. Specifically, you may request that we disclose:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- The business and commercial purposes for collecting your personal information;
- The categories of third parties to whom we disclose your personal information;

- The specific pieces of personal information we collected about you; and
- If we disclosed your personal information for a business purpose, the categories of personal information received by each category of third party.

2. Right to Data Portability. You have the right to request that we provide copies of the specific pieces of personal information we collected about you. If a verifiable consumer request is made, and subject to any exceptions or limitations under the CCPA, we will take steps to deliver the personal information to you either by mail or electronically. If we provide the information to you electronically, it will be in a portable and readily useable format, to the extent technically feasible. Consistent with the CCPA and our interest in the security of your personal information, we will describe but may not provide copies of certain personal information we may receive from you (e.g., driver’s license number, other government-issued identification number, financial account number, health or medical identification number, account password, or security questions or answers) in response to a CCPA request, to the extent any of those items are in our possession.

3. Right to Request Deletion. You have the right to request that we delete personal information we collected from you, subject to any exceptions or limitations under the CCPA.

4. Right to Correct Inaccurate Information. If we maintain inaccurate personal information about you, you have the right to request that we correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

5. Right to Opt-Out. Consumers in California have the right to opt-out of (a) the sale of personal information, or (b) the sharing of their personal information for the purposes of cross-context behavioral advertising (as defined in the CCPA). Because CAF does not “sell” or “share” personal information, these rights are not available.

#### Exercising Your Rights

To exercise the rights described above, you—or someone authorized to act on your behalf—must submit a verifiable consumer request to us by sending an e-mail to [hr@challengedathletes.org](mailto:hr@challengedathletes.org) with the subject line: “CCPA Request” or calling us at 858.866.0959. Your request must include your name, e-mail address, mailing address, phone number, and the specific requests you are making. If you are an agent submitting a request on behalf of a consumer, we may request that you submit a signed permission from the consumer authorizing you to make the request. In order to protect the privacy and data security of consumers, the verifiable consumer request must:

Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative of such consumer; and

Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

As indicated above, please be aware that the CCPA provides certain limitations and exceptions to the foregoing rights, which may result in us denying or limiting our response to your request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request. We may also request that you provide additional

information if needed to verify your identity or authority to make the request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you or the consumer on whose behalf you are making the request.

#### Response Timing and Format

The CCPA requires us to respond to a verifiable consumer request within forty-five (45) days of its receipt; however, we may extend that period by an additional 45 days. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response via e-mail. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request, provided that you may request disclosure beyond the 12-month period as permitted by the CCPA. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select the format of our response; the format will be readily useable and should allow you to transmit the information from one entity to another. We will not charge a fee to process or respond to a verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing the request.

#### Our Commitment Not to Discriminate

We will not discriminate or retaliate against a job applicant for exercising their rights under the CCPA, including by denying you benefits or services that we make available, charging you different prices or rates for services or benefits, providing a different level or quality of services or benefits, or suggesting that you may receive a different price or level of quality of services or benefits.

#### Changes to this Notice

We reserve the right to amend this Notice at our discretion and at any time. If there are changes to this Notice, we will post them here and update the “Last Updated” date at the top of this document. Continued use of this website after any changes is deemed to be acceptance of those changes. Please check this page periodically for updates.

#### Contact Information

Questions regarding this privacy Notice, our use and disclosure your information, or the employment process should be directed to:

Phone: 858.866.0959

Email: [hr@challengedathletes.org](mailto:hr@challengedathletes.org)

Postal Address: 9591 Waples St. San Diego, CA 92121