Notice at Collection of Personal Information and Privacy Policy for California Personnel

Effective January 1, 2023

This Notice at Collection of Personal Information and Privacy Policy apply only to Conversica, Inc. employees, employment applicants, interns, and individual contractors who are California residents, referred to as consumers under the California Consumer Privacy Act of 2018 (“CCPA”) and referred to hereafter as “you” and “your”. Conversica, Inc. is referred to hereafter as the “Company”, “we”, “us”, and “our” and any terms defined in the CCPA, including “personal information”, have the same meaning when used in this notice.

NOTICE AT COLLECTION OF PERSONAL INFORMATION

1. Categories of Personal Information We May Collect

Below are the categories of personal information we may collect from employment, intern, and contractor applicants and employees:

- **Identifying information**, such as your full name, gender, date of birth, and signature.
- **Demographic data**, such as race, ethnic origin, marital status, disability, and veteran or military status.
- **Contact information**, such as your home address, telephone numbers, email addresses, and emergency contact information.
- **Dependent's or other individual's information**, such as their full name, address, date of birth, and Social Security numbers (SSN).
- **National identifiers**, such as SSN, passport and visa information, and immigration status and documentation.
- **Educational and professional background**, such as your work history, academic and professional qualifications, educational records, references, and interview notes.

● **Employment details**, such as your job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records. ● **Financial information**, such as banking details, tax information, payroll information, and withholdings.

- **Health and Safety information**, such as health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, and health insurance policy information.
- **Information Systems (IS) information**, such as your search history, browsing history, login information, and IP addresses on the Company's information systems and networks.
- **Biometric information:** none.
- **Geolocation data**, such as time and physical location related to use of an internet website, application, device, or physical access to a Company office location.
- **Sensory or surveillance information**, online meeting call monitoring and video surveillance at office entrances.
- **Inferences drawn from other information**, such as a profile or summary if you participate in a Meyer-Briggs or similar survey about an applicant/employee's preferences, attitudes, abilities, and aptitudes.
- **Sensitive information**, such as race and ethnic origin, your social security number, driver's license or passport number.

2. Purposes for Which Personal Information is Collected

The Company collects personal information to use or disclose as appropriate to:

- Comply with all applicable laws and regulations.
- Recruit and evaluate job applicants and candidates for employment.
- Arrange for background checks to be conducted.
- Manage your employment relationship with us, including for:
    - onboarding processes;
    - timekeeping, payroll, and expense report administration;
    - employee benefits administration;
    - employee training and development requirements;
    - the creation, maintenance, and security of your online employee accounts;
    - reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
    - workers' compensation claims management;
    - employee job performance, including goals and performance reviews, promotions, discipline, and termination.

- Manage and monitor employee access to company facilities, equipment, and systems.
- Conduct internal audits and workplace investigations.
- Investigate and enforce compliance with and potential breaches of Company policies and procedures.
- Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company.
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking. ● Administer and maintain the Company's operations, including for safety purposes.
- For marketing purposes.
- Exercise or defend the legal rights of the Company and its employees, and affiliates.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you or your agent. For example, from documents or forms that you may provide to us related to participating in our health or retirement benefit programs or the job position for which you are applying.
- Indirectly from you or your agent. For example, from evaluating your performance in your job position or a prior job position related to the job position for which you are applying.
- Directly and indirectly from your activity on our site (www.conversica.com) or your use of an online application or business system provided by Conversica. For example, browsing history on our site while on our network or use of our company email.
- From third party Service Providers that provide services to us in connection with our business operations. For example, employment applicant contact information from our applicant tracking system provider.

3. Retention of Personal Information

We retain your personal information that we collect in accordance with our records retention schedule, which is part of our Data Retention Policy. We calculate retention periods based upon and reserve the right to retain personal information for the periods that the personal information is needed to: (a) fulfill the purposes described in this Privacy Notice, (b) meet the timelines determined or recommended by regulators,

professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

PRIVACY POLICY FOR CALIFORNIA PERSONNEL

1. Overview

In this Privacy Policy we inform you about the personal information that we may collect, use, and share, the rights you have with regard to your personal information, and how you may exercise those rights. Please note that personal information as used herein does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

In general we collect and use personal information for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance. This Privacy Policy incorporates by reference the information provided in the above Notice at Collection of Personal Information where you can read about the categories of personal information we may collect, the purposes for which your personal information is collected, and applicable retention periods.

2. Sharing Personal Information

We may share your personal information for a business purpose. When we disclose personal information for a business purpose, we do so pursuant to a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except for performance, or rendering services, under the contract.

We may disclose your personal information for a business purpose to the following categories of third parties or in the following contexts:

- **Service providers**. We may contract with third party companies and individuals to administer and provide employee-related services on our behalf. ● **Professional advisors**. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

- **Government or law enforcement officials or private parties**. We will disclose your personal information as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern our agreements with you; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.
- **Business Transfers**. Conversica may sell, transfer, or otherwise share some or all of personal information in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Notice for California Personnel.

3. Your Rights

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity we will disclose to you: ● The categories of personal information we collected about you.

- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or sharing that personal information.
- The categories of third parties with whom we share that personal information.

If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- sales, identifying the personal information categories that each category of recipient purchased; and
- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

The specific pieces of personal information we collected about you (also called a

data portability request).

Please be aware that most of our response to such a request may consist of the same disclosure information provided in this Notice.

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide benefits or employment-related services or goods that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Correct

You have the right to request that we correct any of your personal information we have collected from you or otherwise processed that is incorrect.

Right to Restrict Any Disclosure and Use of Sensitive Personal Information for Purpose of Inferring Characteristics

You have the We do not believe we are using any sensitive information for the purpose of inferring characteristics.

4. How to Exercise Your Consumer Rights

To exercise a right noted above please contact privacy@conversica.com with your related request. If we cannot initially verify your identity, we may request additional information to complete the verification process, such as, for example, a copy of your driver's license and/or a recent utility or credit card bill. You can designate an agent to make a request on your behalf by either: (1) having your agent send us a letter, signed by you, certifying that the agent is acting on your behalf and showing proof that they are registered with the California Secretary of State; or (2) by you and the agent executing and sending us a notarized power of attorney stating that the agent is authorized to act on your behalf. Please note that we may still require you to verify your identity before we process a request submitted by your agent.

You also have certain rights regarding the sale of personal information. Because we do not sell your information we do not offer you the ability to opt out of the sale of your personal information.

We will not discriminate against you because you have exercised any of your privacy rights under the CCPA.

5. Changes

We reserve the right to make changes to the above Notice of Collection and Privacy Notice at our discretion and at any time. When we make material changes to this privacy notice, we will post the updated notice on the Conversica Trust site (trust.conversica.com), update the notice's Effective Date above and, if you are a current employee, notify you of the change by email.

6. Contact Information

If you have any questions or comments about this Privacy Policy for California Personnel, please send an email to Converica's privacy team at privacy@conversica.com or send a written inquiry to:

Conversica, Inc.
Attn: Privacy Team
1730 South El Camino Real, Suite 350
San Mateo, California 94402