



# CCPA Privacy Notice for California Employees and Applicants

Effective 1/10/23

This CCPA Privacy Notice ("Notice") applies solely to all job applicants, employees, owners, directors, officers and contractors who reside in the State of California. Drake Software, LLC ("Drake") adopts this notice to comply with the California Consumer Privacy Act and California Consumer Rights Act, as amended ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Notice.

Drake collects and uses Personal Information and Sensitive Personal Information for human resources, employment, benefits administration, health and safety, and business-related purposes such as security, and to comply with applicable laws and regulations.

We are committed to protecting the privacy and security of the information we collect and to being transparent about the purposes for which we use your information. Below are the categories of Personal Information and Sensitive Personal Information we collect and the purposes for which we intend to use this information:

- **Identifying information**, such as your full name, gender, date of birth, and signature.
- **Government identifiers**, such as Social Security number (SSN), driver's license, state identification card or passport.
- **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.
- **Information of dependents or other individuals**, such as their full name, address, date of birth, and 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.
- **Biometric information**, such as digital photographs used for identification.
- **Information Systems (IS) information**, such as your search history, browsing history, login information, and IP addresses on Drake's information systems and networks.
- **Geolocation data on Drake-connected devices**, such as time and physical location related to use of an internet website, application, device, or physical access to a Drake office location.
- **Sensory or surveillance information**, such as COVID-19 related temperature checks, call monitoring, and video surveillance in Drake's physical facilities.
- **Profile or summary information** about an applicant or employee's preferences, characteristics, attitudes, intelligence, abilities, and aptitudes.

Drake collects Personal Information and Sensitive Personal Information to comply with applicable laws and regulations and to use or disclose as appropriate to:

## Prior to Employment

- Recruit and evaluate job applicants and candidates for employment.
- Conduct background and reference checks in accordance with law.

## During Employment

- **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; and
  - employee job performance, including goals and performance reviews, promotions, discipline, and termination
- **Maintain data security and privacy posture, including to:**
  - manage and monitor employee access to Drake facilities, equipment, and systems;
  - conduct internal audits and workplace investigations; and
  - investigate and enforce compliance with and potential breaches of Drake policies and procedures.
- **Maintain business operations, including to:**
  - engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Drake;
  - maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance;
  - perform workforce analytics, data analytics, and benchmarking;
  - administer and maintain Drake's operations, including for safety purposes; and
  - exercise or defend the legal rights of Drake and its employees.

## Post Employment

- Manage unemployment insurance disputes.
- Analyze employee retention including exit interviews.
- Respond to subpoenas, orders, and liens/levies.
- Maintain employment records pursuant to applicable state and federal regulations.

Drake will not sell your personal information, including any sensitive personal information we collect about our employees or applicants for employment, or share it with third parties for cross-context behavioral advertising.

## Data Retention

Drake retains employee data for as long as it is needed for employment, operational, or legal purposes. Our retention periods are based on the type of employee data collected, the applicable regulations to such data, any contractual obligations such as those defined in benefits contracts, or any other government requirements such as those found in garnishments. When we no longer need to retain data, we destroy the data by making it unreadable or indecipherable.

We may update this Notice from time to time, in which case the revised Notice will be posted to our intranet or provided to you in writing, by email. If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact the Drake HR Department at [hr\\_email@drakesoftware.com](mailto:hr_email@drakesoftware.com).