

# Privacy Notice for California Employees and Job Applicants

**Effective Date:** January 1, 2020

**Last Reviewed on:** January 1, 2020

This **Privacy Notice for California Employees and Job Applicants** applies solely to employees or job applicants who reside in the State of California (“consumers” or “you”). Invivoscribe, Inc.’s (“IVS” or “we”) adopts this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

## Information We Collect

We collect information from our employees and job applicants that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**personal information**”). In particular, Invivoscribe, Inc. (“IVS” or “we”) has collected the following categories of personal information from its employees or job applicants within the last twelve (12) months:

Category	Examples <sup>1</sup>	Collected	Sources	Purpose	Third Parties Shared
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	(a) Directly or indirectly from you (b) From third parties	(a) Performance of a contract (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Human resources information service providers (b) Financial investment service providers (c) Wellness program service providers (d) Insurance providers (e) Payroll service providers (f) Building management/security providers (g) Professional service providers, including external auditors
B. Personal information categories listed in the California Customer	A name, signature, Social Security number, physical characteristics or description, address, telephone number,	YES	(a) Directly or indirectly from you (b) From third parties	(a) Performance of a contract (b) Necessary for our legitimate	(a) Human resources information service providers (b) Financial investment service providers

<sup>1</sup> Examples listed herein are illustrative of the types of personal information included in each category and may or may not be the specific types of personal information collected on an individual employee or job applicant. Additionally, some personal information included in these categories may overlap with other categories.

Category	Examples <sup>1</sup>	Collected	Sources	Purpose	Third Parties Shared
Records statute (Cal. Civ. Code § 1798.80(e)).	passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.			interests  (c) Necessary to comply with a legal obligation	(c) Wellness program service providers (d) Insurance providers (e) Payroll service providers (f) Building management/security providers (g) Professional service providers, including external auditors
C. Protected classification characteristics under California or federal law.	Race (which includes historically associated traits, such as hair styles and protective hair styles, e.g., braids, locks, and twists), religious creed (which includes religious dress and grooming practices), color, national origin (which includes, but is not limited to, national origin groups and aspects of national origin, such as height, weight, accent, or language proficiency), ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (which includes pregnancy, childbirth, breastfeeding, and related medical conditions), gender, gender identity, gender expression, age, sexual orientation, military or veteran status (including state and federal active and reserve members as well as those ordered to duty or training), immigration/citizenship status or related protected activities (which includes undocumented individuals and human trafficking), protected medical leaves, domestic violence victim status, political affiliation, or any other category or activity protected by federal, state, or local	YES	(a) Directly from you	(a) Necessary for our legitimate interests  (b) Necessary to comply with a legal obligation	(a) Human resources information service providers (b) Financial investment service providers (c) Wellness program service providers (d) Insurance providers (e) Payroll service providers (f) Building management/security providers (g) Professional service providers, including external auditors

Category	Examples <sup>1</sup>	Collected	Sources	Purpose	Third Parties Shared
	laws, ordinances, or regulations.				
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	N/A	N/A	N/A
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	N/A	N/A	N/A
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	(a) Directly or indirectly from you	(a) Necessary for our legitimate business interests  (b) Necessary to comply with a legal obligation	(a) Analytics and business intelligence vendors  (b) Cybersecurity vendors
G. Geolocation data.	Physical location or movements.	YES	(a) Directly or indirectly from you	(a) Necessary for our legitimate interests	N/A
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	N/A	N/A	N/A
I. Professional or employment-related information.	Current or past job history.	YES	(a) Directly from you  (b) From third parties	(a) Necessary for our legitimate interests	N/A
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes,	YES	(a) Directly from you	(a) Necessary for our legitimate interests	N/A

Category	Examples <sup>1</sup>	Collected	Sources	Purpose	Third Parties Shared
Part 99)).	student financial information, or student disciplinary records.				
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	(a) Directly from you (b) From third parties	(a) Necessary for our legitimate interests	N/A

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

IVS obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or information you provide during the application process.
- Indirectly from you. For example, from observing your actions with computer systems, software or other platforms offered by IVS.
- Third Parties. For example, from vendors used for background checks or aptitude and ability testing.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, to conduct payroll and timekeeping activities, administer benefits, or offer wellness programs.
- To investigate and help prevent fraud or otherwise ensure compliance with policies and procedures.
- To provide you with support and to respond to your inquiries, including to investigate and address your workplace concerns and monitor and improve our responses.

- To help maintain the safety, security, and integrity of our systems, services, databases and other assets.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of IVS's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by IVS about employees or job applicants is among the assets transferred.

IVS will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

#### **Changes to This Privacy Notice**

IVS reserves the right to amend this privacy notice at our discretion and at any time. When we make substantive changes to this privacy notice, we will notify you of the changes via e-mail and post the updated notice on the IVS website and update the notice's effective date.

#### **Questions About This Privacy Notice**

If you have any questions or comments about this notice or the ways in which IVS collects and uses your information, please contact: Kathleen Demarest; email: [kdemarest@invivoscribe.com](mailto:kdemarest@invivoscribe.com); telephone: (858) 224-6677 direct.