GenSphire Privacy Statement

This Privacy Statement (the "Statement") describes how we collect and process your Personal Data. This Statement applies to all companies doing business as GenSphire LLC. When we refer to "GenSphire," or "we," "our," or "us" in this Statement, we are referring to GenSphire®, responsible for processing your Personal Data. This Statement supplements any other privacy notices and policies. It is not intended to override them, including, but is not limited to, any provisions in the Employee, Consultant, and Vendor Handbook.

Definitions

- **"Full Time"** means an individual who works, or is applying to work, for a client of GenSphire, and that client is a company to which GenSphire provides services.
- **"GenSphire Employee"** means an individual who works, or is applying to work, for GenSphire in the capacity of an employee internally at GenSphire.
- **"GenSphire Vendor"** means a company, independent professional, or organization that works, or is requesting to work, for GenSphire in the capacity of a vendor.
- **"Contractor"** means an individual who works, or is applying to work, for GenSphire in the capacity of a GenSphire Vendor whom GenSphire assigns to work at GenSphire's clients.
- **"Consultant"** means a GenSphire Vendor.
- **"Personal Data"** means any information that identifies, relates to, describes, or is reasonably capable of being linked directly to any individual or household.
- **"Processing"** means any operation or set of operations which is performed on Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Personal Data We Collect

The categories of Personal Data collected may include the following:

- **Identifiers**, such as your name, username or similar online identifier, password, employee/staff ID, date of birth, Social Security number or equivalent national identification number, driver's license, California or other state identification card, passport number, or other government-issued identification card.
- **Contact Information**, such as your work and home addresses, telephone numbers, email addresses, and emergency contact details.
- **Characteristics of protected classifications** under California, provincial or federal law,

such as your race, age, gender, national origin, citizenship, self-identification of disability, request for leave for family care, health condition, pregnancy, military or veteran status, and marital status.

- **Information about your job**, such as job title, category and status, work location, department, employment contract, assigned tasks and projects, weekly hours, supervisor's name, start and end date, and reason for leaving.
- **Education information**, such as your education and training background.
- **Professional or employment-related information and documents**, such as prior work experience and any other information that may be included in your resume or job application, training, confidentiality agreements, and proprietary rights agreements.
- **Internet and other electronic network activity information**, such as information about how you use our website, products and services using cookies (as discussed further below), IT systems usage information related to your use of our equipment, systems, and other resources.
- **Audio and visual information**, such as photographs and phone and video recordings.
- **Marketing and Communications Data** includes your preferences in receiving marketing from our third parties and us and your communication preferences, email content, business letter content, business documents, and chat content.
- **Data Voluntarily Submitted** including any data that you voluntarily submit through contact forms, resume, or cover letter.
- **Performance and disciplinary information**, such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances, and any outcome.
- **Information about your compensation and benefits**, such as your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that we provide to the insurer), hours and overtime, tax code, holiday entitlement, accrued salary information, and information relating to your pension.
- **Family Information**, such as the marital status, name, relationship, date of birth, and social security numbers of your family members and any other information that may be needed for the administration of benefits, and contact details to identify who to contact in the case of an emergency.
- **Financial information**, such as your bank details (for payroll, payments and travel reimbursement purposes only) and business travel and entertainment data.
- **Health information**, as required by law or as necessary to manage the employment relationship, including benefits administration, occupational health, disability accommodation, Consultants' compensation, and leaves of absence.
- **Union membership status**, as required by law to ensure benefits, terms of employment, and employment policies comply with the Union's requirements or any relevant collective agreement.

- **Termination and Post-Employment Information**, such as termination agreements, benefits notices, and unemployment compensation forms.

Sensitive Personal Information

We collect Personal Data that is defined as "Sensitive Personal Information" under applicable privacy laws, including driver's license, state identification card, passport, or other government-issued identification card, social security numbers, race or ethnic origin, citizenship, immigration status, and health information. We use and disclose Sensitive Personal Information only as necessary: (i) to process your request for employment, (ii) to provide services and benefits in connection with your employment, (iii) to comply with the law, and (iv) for business purposes reasonably expected within the scope of your employment.

Retention

For each of these categories of Personal Data, we will retain the information as long as is reasonably necessary to fulfill the purpose for which it was collected and to comply with applicable laws and regulations. We consider the following criteria when determining how long to retain Personal Data: why we collected the Personal Data, the nature of the Personal Data, the sensitivity of the Personal Data, our legal obligations related to the Personal Data, and the risks associated with retaining the Personal Data.

Client Data Collection

This Statement is directed solely to our collection and use of your Personal Data. Clients of GenSphire may also collect the Personal Data of Full-Time and Temporary Employees, and any such collection and use by clients shall be governed by the client privacy policies.

If You Do Not Provide Personal Information

Where we need to collect Personal Data by law, to perform our services, or pursuant to a contract we have with you, and you do not provide that data when requested, we may not be able to perform the services or contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you at the time.

Information You Provide To A Third Party

Our website includes links to, and plug-ins (such as Facebook, BlueSky, and LinkedIn buttons) from, sites or applications operated by third parties ("Third-Party Sites"). GenSphire does not control any Third-Party Sites and is not responsible for any information they may collect. Its privacy Statement governs the information collection practices of a Third-Party Site. It is your

choice to enter any Third-Party Site. We recommend that you read its privacy Statement if you choose.

Children's Privacy

Our website and online services are intended for adult use only and are not directed towards children, minors, or anyone under the age of 18. If you are under the age of 16, you are not authorized to provide us with any Personal Data. If a parent or guardian believes that a child under 16 has provided us with any Personal Data, please contact us at the email address below and ask to have this Personal Data deleted from our files.

HOW WE COLLECT YOUR PERSONAL DATA

We may collect your Personal Data from a variety of sources and methods. This includes:

Information You Voluntarily Provide to Us

We collect Personal Data from you that you voluntarily provide to us, including when you: fill out a Contact Us form; subscribe to our publications; create an account; request marketing materials; request reminders to apply for an open position; fill out an employment application and during the scope of your employment; give us feedback; or attend any of our events, promotions, or other programs where we collect information about you.

Information We Collect When You Use Our Systems

We collect Personal Data when you use our systems, including computer systems, security systems, timekeeping systems, and any internal intranet or online platforms.

Information We Collect When You Use Our Website

- **Automated technologies or interactions.** If you use one of our websites, we receive and store internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our website from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address, and device type.
- **Cookies.** Our websites may also place cookies on the device that you use to access the websites. Cookies are small files that our service providers or we transfer to your device through your web browser that enable us or our service providers' systems to recognize your browser and capture and remember certain information. We use cookies to help us understand how users use the website.

- **Google Analytics.** We use Google Analytics to help us better understand our website visitors. Google Analytics uses a first-party cookie, identifiers for mobile devices, or similar technology to collect usage data. Based on this information, Google Analytics compiles data about website traffic and interactions, which we use to offer better user experiences, perform analytics, analyze traffic, personalize content, and offer ads that match your interests.

HOW WE USE YOUR PERSONAL DATA

GenSphire uses Personal Data for all purposes related to the creation, administration, and termination of GenSphire Employees' and contractors' employment relationships with GenSphire and for all purposes related to vetting full-time employees to work at GenSphire's clients. These purposes include, but are not limited to, the following:

- To respond to requests for information, evaluate feedback and complaints.
- To communicate with users, e.g., applicants applying for jobs.
- To evaluate applicants for internal jobs and consulting assignments with GenSphire's clients.
- To improve our products and services and continuously evaluate and improve the online experience.
- To administer employee compensation, benefits, performance appraisals, safety, and travel arrangements.
- To administer leaves of absence as required by law or company Statement.
- To monitor and enforce compliance with internal policies.
- To comply with mandatory government reporting requirements and conduct audits as required by law.
- If you are a Temporary Employee: to place you with clients by matching your qualifications against the client's staffing needs.
- For recruitment purposes, and to assess applicants' qualifications and eligibility to work in the US or Canada.
- To exercise GenSphire's rights under applicable law and to support any claim, defense, or declaration in a case.

HOW WE DISCLOSE PERSONAL DATA

Information You Direct Us to Disclose

You may be presented with an option on our service to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties. Additionally, when you apply for a position,

we disclose Personal Data for contractors and full-time employees to clients for evaluation, hiring, placement, and to comply with legal obligations but only to the extent required to meet these purposes.
*Please note: we will not share your phone number or SMS consent information with any third parties for marketing purposes. If you have consented to receive text messages from GenSphire, you may receive text messages related to information about your application status, onboarding materials, other employment-related updates, or client assignments.

Personal Data We Disclose for a Business Purpose

Service Providers. We may use third-party service providers to perform certain business services on behalf of us or the services. We may disclose Personal Data to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose, or retain the Personal Data to provide these services and are prohibited from selling Personal Data.
Internal Third Parties. We may disclose Personal Data to our parent company, subsidiaries, and other related companies owned by, controlled by, or under common ownership, who may use the Personal Data for the purposes described above.
Personal Data Sold or Shared. We do not sell any Personal Data. In the United States, we have shared information about your interaction with our website in the past twelve months with Google by allowing Google to place cookies and a Remarketing Code on our website for data analytics and to serve ads to you about our products and services as you browse the Internet. We do not have any actual knowledge of selling or sharing Personal Data of minors under 16 years of age.
Business Transactions. We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.
Legal Process. Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation or legal process; (ii) in response to requests by government entities; (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

HOW WE PROTECT THE PERSONAL DATA WE COLLECT

We have technical, administrative, and physical security measures in place designed to protect your Personal Data from unauthorized access, disclosure, or improper use. For example, we use Transport Layer Security (TLS) encryption to protect the data collection forms on our

website. In addition, we restrict access to your Personal Data to employees who need it to perform a specific job.

REGION-SPECIFIC INFORMATION

1. a) California Privacy Rights

The California Consumer Privacy Act as amended ("CCPA") provides California residents with specific rights regarding their Personal Data. This section describes your CCPA rights and explains how to exercise those rights.

- **Right to Know:** You have the right to know what Personal Data we have collected about you, including the categories of Personal Data, the categories of sources from which the Personal Data is collected, the business or commercial purpose for collecting, selling, or sharing Personal Data, the categories of third parties to whom we have disclosed Personal Data, and the specific pieces of Personal Data we have collected. You may exercise this right no more than twice in any 12 months.
- **Right to Delete:** You have the right to request that we delete Personal Data that we collected from you and retained, subject to certain exceptions.
- **Right to Correct:** You have the right to correct inaccurate Personal Data that we maintain about you.
- **Right to Opt-Out of the Sale/Sharing:** You have the right to opt-out of the sale or sharing of your Personal Data by the business. We do not sell your Personal Data.
- **Right to Limit the Use or Disclosure of Sensitive Personal Information:** You have the right to request that we limit the use and disclosure of sensitive Personal Information to specific business purposes approved by the CCPA. Our use of Sensitive Personal Information is already limited to the approved business purposes identified above.
- **Right to Opt-Out of Automated Decision-Making Technology (ADMT):** If we utilize ADMT to make significant decisions regarding your employment or placement, you have the right to receive a pre-use notice explaining the technology in plain language. You also have the right to opt out of the use of ADMT and access information about how these automated decisions are made. To exercise your right to opt-out of ADMT processing, please submit a request to jobs@GenSphire.com.
- **Right to Non-Discrimination:** Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under CCPA or applicable law.

Exercising Your Rights

Requests can be submitted by contacting jobs@GenSphire.com. You can also opt out of sharing (having Personal Data transmitted through third-party cookies and pixels) by declining

cookies when you first visit our website. Additionally, if your browser supports it, you can turn on the Global Privacy Control (GPC) to opt out of the 'sharing' of your Personal Data. When our systems detect a valid GPC signal, we will honor it as a valid request to opt out and provide a visible confirmation on your screen that the request has been processed.
Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Data.

Verifying Your Request

The verifiable consumer request initiated by you or your authorized agent must include your full legal name and email, which we will need to contact you to verify that you are the person about whom we collected Personal Data or an authorized representative, and describe your request with sufficient detail that allows us to understand, evaluate, and respond to it properly.
We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you.

Response Timing and Format

We endeavor to respond to a verifiable request within 45 days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing. If we determine that the request warrants a fee, we will provide you with a cost estimate before completing your request.

1. b) Canada

The Company makes commercially reasonable efforts to keep your personal information complete, up-to-date and accurate. Should you wish to access, update, correct or delete your personal information or express any concerns regarding our use of your personal information, please contact our Privacy Officer at admin@GenSphire.com.

2. c) Quebec Residents

If you are a resident of Quebec, you have certain additional rights under applicable data protection laws. These may include the rights (i) to restrict dissemination of your personal information or to have your personal information de-indexed from search results (the right to be forgotten); (ii) to be informed when your personal information was used to render a decision based exclusively on automated processing and to request further information about the automated decision-making; and (iii) to data portability.

Changes to this boilerplate Statement

We may modify or update this Statement from time to time. We encourage you to revisit this page often to remain fully informed of our Statement, or you can contact us anytime to obtain the latest copy.

Questions about this boilerplate Statement

If you have any questions or concerns about this Statement, you can contact GenSphire® Founder Jennie Jackson by emailing Jennie@GenSphire.com.

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