

California Consumer Privacy Notice to California Employees and Job Applicants
LAST UPDATED: December 27, 2022

This California Employee Privacy Notice (the “California Employee Privacy Notice”) applies to the personal information of California-resident employees, interns, contractors, and job applicants collected by Fusion Education Group and its affiliates (“Fusion,” “Company”). It also applies to information provided to us about employees’ relatives or others that is used for emergency contact or benefits administration purposes.

Under the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”), collectively referred to as the “CA Privacy Law,” you have the right to know and understand the categories of personal information we collect about you, and the purposes for which we use such personal information. Certain terms used in this California Privacy Notice have the meaning given to them in the CCPA or CPRA and their implementing regulations. Fusion does not sell or otherwise disclose this personal information for monetary or other consideration to any third parties.

The following chart details which categories of personal information we collect and process, as well as which categories of Personal information we disclose to third parties for our operational business and employment purposes.

<p>Personal identifiers and information, as defined in the California safeguards law, including without limitation, name, preferred name, signature, Social Security number, date of birth, physical characteristics or description, postal address, email address, telephone number, 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, and other unique personal identifiers associated with you or your beneficiaries such as your spouse or child</p>
<p>Protected Class Information, such as characteristics of protected classifications under California or federal law, including without limitation, age, gender, medical conditions, marital status, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), race, color, religion or creed, ancestry, national origin, disability, genetic information, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, violence victim status, and requests for leave</p> <p>We only collect this information if you voluntarily disclose it and as permitted by applicable law, and we will not use this information to make hiring decisions.</p>
<p>Commercial Information, such as transaction information and purchase history, travel expenses, including information about corporate credit card purchases, and other travel-related programs and expenses</p>
<p>Biometric Information, such as face scans, fingerprints, key stroke patterns and voiceprints Note: biometric information is sensitive personal information also referenced below</p>
<p>Internet or Network Activity Information, such as username and password, account name or number, and other online or device identifiers, interactions with our websites and applications, access and usage information regarding websites, applications, and systems, information about online communications, including email communications, browsing, search history, and call/chat logs, timestamp information, IP address, and access and activity logs</p>
<p>Geolocation Data, such as precise location information, device location, approximate location derived from IP address and also badge/key card access at company locations</p>

<p>Audio, electronic, visual and similar information, such as photographs, images, call and video recordings, including voicemail and security camera footage, information about the use of electronic devices and systems, key card usage, facility entry and exit actions, photos on websites or in employee directories</p>
<p>Education Information such as student education history records (such as transcripts, grades) and directory information</p>
<p>Professional or Employment Information, such as job interview notes, responses to screening questions, work history, prior employer, information from reference checks, background screening information, employment application and resume or other information provided in the recruitment process, membership in professional organizations, licenses/certifications, personnel files, personal qualifications and training, eligibility for promotions and other career-related information, work preferences, business expenses, wage and payroll information, benefit information, information on leaves of absence or PTO, performance reviews, information on internal investigations or disciplinary actions</p>
<p>Inferences drawn from any of the Personal information listed above to create a profile or summary about, for example, an individual's preferences, characteristics, predispositions and abilities</p>
<p>Sensitive Personal Information:</p> <ul style="list-style-type: none"> • Personal information that reveals an individual's Social Security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, or union membership; the contents of mail, email, and text messages unless the company is the intended recipient of the communication; genetic data; • The processing of biometric information for the purpose of uniquely identifying an individual; • Personal information collected and analyzed concerning an individual's health or sexual orientation.

Disclosure of Personal Information: We may share your personal information with the following third parties for our operational business and employment purposes:

- Affiliates and Subsidiaries
- Service Providers providing services such as: payroll, consulting, training, expense management, medical benefits, IT, credit card processing, recruiting, pre-employment screening, background checks, and other services
- Public and Governmental Authorities: As required by law or legal process, we may share your personal information with federal or state regulatory agencies, law enforcement, courts and other governmental authorities.
- Professional Advisors such as: accountants, auditors, bankers, and lawyers
- Customers and Business Partners: Customers, other companies, and individuals with whom the company does business or is exploring a business relationship.
- Parties Involved with Business Transfers: We may share your personal information to third parties in the event we sell or transfer all or a portion of our business, assets or stock (including in the event of a financing transaction, merger, acquisition, joint venture, partnership, reorganization, divestiture, dissolution or liquidation).

We do not sell personal information of covered individuals, and we do not share or otherwise process personal information of covered individuals for purposes of cross-context behavioral advertising, as defined under the CA Privacy Law.

The following personal information elements, which are also identified above, may be classified as "sensitive" under the CCPA: Social Security number, work-related accounts and passwords, and financial account information. We may use this sensitive information for the purposes set forth regarding personal information.

Sources of Personal Information: We collect personal information from you and from our affiliates, your colleagues and managers, references you provide, prior employers or schools, customers, background check providers, providers of employee benefits, social networks, publicly available databases, and cooperative databases. We collect personal information about our employees' and other individuals' emergency contacts and beneficiaries from those employees or other individuals.

Purposes for the Collection, Use and Disclosure of Personal and Sensitive Personal Information: We may collect or use personal information for the purposes of operating, managing, and maintaining our business, managing our workforce and other employment purposes, and accomplishing our business purposes and objectives, including, for example, using personal information to:

- Plan and manage workforce activities and personnel generally, including for recruitment, employee onboarding, appropriate staffing, performance management, training and career development, payments and benefit administration, employee training, leaves and promotions;
- Conduct workforce assessments, including determining physical or mental fitness for work and evaluating work performance;
- Process payroll, manage wages and other awards such as stock options/grants and bonuses, reimburse expenses, and provide healthcare, retirement plans, and other benefits;
- Operate, maintain, monitor, and secure our facilities, equipment, systems, networks, applications, and infrastructure;
- Manage attendance, time keeping, leaves of absence, and vacation;
- Facilitate employee communication and workforce travel;
- Undertake quality and safety assurance measures, protect the health and safety of our workforce and others, and conduct risk and security control and monitoring;
- Conduct research, analytics, and data analysis, such as to assist in succession planning and to ensure business continuity, as well as to design and implement employee retention programs, and diversity, equity, and inclusion initiatives;
- Perform identity verification, accounting, budgeting, audit, and other internal functions, such as internal investigations, disciplinary matters, and handling grievances and terminations;
- Operate and manage IT and communications systems and facilities, allocate company assets and human resources, and undertake strategic planning and project management; and
- Comply with law, legal process, requests from governmental or regulatory authorities, internal policies, and other requirements, such as income tax deductions, recordkeeping, work permit and immigration regulations and reporting obligations, and the exercise or defense of legal claims.

Retention Period: We retain Personal information including sensitive personal information, for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- The duration of your employment;
- The length of time we have an ongoing relationship with you or your dependents/beneficiaries and the length of time thereafter during which we may have a legitimate need to reference your personal information, such as to address issues that may arise;
- Whether there is a legal obligation to which we are subject (for example, certain laws may require us to keep your employment records for a certain period of time); and
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

Individual Requests: You may, subject to applicable law, make the following requests:

- You may request we disclose to you the following information covering the 12 months preceding your request:
 - The categories of Personal information we collected about you and the categories of sources from which we collected such Personal information;

- The business or commercial purpose for collecting Personal information about you; and
- The categories of Personal information about you we otherwise disclosed and the categories of third parties to whom we disclosed such Personal information.
- You may request to correct inaccuracies in your Personal information.
- You may request to have certain Personal information you provided to us deleted.
- You may request to receive a copy of your Personal information, including a copy of the Personal information you provided to us in a portable format.

To make a request, please contact us at humanresources@fusionacademy.com. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the personal information subject to the request. We may need to request additional personal information from you in order to verify your identity and protect against fraudulent requests. If you make a request to delete, we may ask you to confirm your request before we delete your personal information.

We will not unlawfully discriminate or retaliate against you for exercising a right conferred by the CA Privacy Law.

Policy Updates: We may change or update this notice from time to time. When we do, we will post the updated notice in Fusionology and on our Careers Page. If you have questions regarding this Privacy Notice, please contact Human Resources.