

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last updated on January 1, 2023

This **Privacy Notice for California Residents** supplements the information contained in Zenith's Privacy Statement (<https://www.thezenith.com/zenith/privacy-center/privacy-statement>), Zenith's Privacy Policy for California Residents (<https://www.thezenith.com/zenith/privacy-center/privacy-policy-for-california-residents>), and any other privacy notices previously provided to you. This policy applies solely to natural persons who are residents in the State of California ("consumers" or "you"). We adopt this policy to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020, and any implementing regulations (collectively the "Act"). Any terms defined in the Act have the same meaning when used in this notice.

When you apply for employment or an internship with Zenith or receive a job offer, we may collect the following information: 1) your name; 2) your physical and mailing address; 3) your email address; 4) your telephone number; 5) your signature; 6) your Social Security number, federal employer identification number or other federal or state identification number; 7) your driver's license number and driving records (if needed); 8) your date of birth; 9) your gender or ethnicity (if provided); 10) your marital status; 11) your professional license number; 12) your professional employment information; 13) your nonpublic educational records; 14) your criminal activity (if applicable); 15) your passport number (if needed); 16) your citizenship status; and 17) your financial information (if applicable).

The chart below identifies, in general, the categories of personal information collected and the corresponding business purpose.

	Category	Examples	Business Purpose
A	Identifiers	A real name, alias, postal address, online identifier, IP address, email address, account name, Social Security Number, driver's license number, passport number or other similar identifiers.	<ul style="list-style-type: none"> • Communicating with you • Complying with law • Due diligence for employment purposes • Security Purposes
B	Personal Information categories described in CA Customer Records Statute (Cal. Civ. Code Section 1798.80(e))	A name, signature, Social Security Number, physical characteristics or description, 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.	<ul style="list-style-type: none"> • Communicating with you • Complying with law • Due diligence for employment purposes • Security Purposes
C	Characteristics of protected classifications under CA or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<ul style="list-style-type: none"> • Complying with law • Due diligence for employment purposes
D	Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Complying with law • Due diligence for employment purposes
F	Internet or other electronic network activity information	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<ul style="list-style-type: none"> • Complying with law • Due diligence for employment purposes
I	Professional or employment related information	Current or past job history or performance evaluations, income and salary details, credentialing information.	<ul style="list-style-type: none"> • Complying with law • Due diligence for employment purposes

J	Nonpublic and personally identifiable education information as defined in Family and Educational Rights and Privacy Act (20 U.S.C. §1232g)	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, student financial information, or student disciplinary records.	<ul style="list-style-type: none"> • Complying with law • Due diligence for employment purposes
L	Sensitive personal information	<p>1) Personal information that is not publicly available and that reveals:</p> <p>(A) a consumer's Social Security, driver's license, state identification card, or passport number;</p> <p>(B) a consumer's 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;</p> <p>(C) a consumer's precise geolocation;</p> <p>(D) a consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership;</p> <p>(E) the contents of a consumer's mail, email and text messages, unless the business is the intended recipient of the communication;</p> <p>(F) a consumer's genetic data,</p> <p>(2)</p> <p>(A) the processing of biometric information for the purpose of uniquely identifying a consumer;</p> <p>(B) personal information collected and analyzed concerning a consumer's health;</p> <p>(C) personal information collected and analyzed concerning a consumer's sex life or sexual orientation.</p> <p>Sensitive personal information that is "publicly available" pursuant to paragraph 2 of subdivision (v) of Section 1798.140 shall not be considered sensitive personal information or personal information.</p>	<ul style="list-style-type: none"> • Complying with law • Due diligence for employment purposes • Security Purposes

Personal information does not include:

- Publicly available information from federal, state, or local government records.
- Deidentified or aggregated consumer information.
- Information to the extent it is subject to the Fair Credit Reporting Act.
- Information excluded from the Act's scope such as personal information collected, processed, sold or disclosed pursuant to the Gramm-Leach-Bliley Act and implementing regulations, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

When information is subject to an exclusion, your rights under the Act are limited.

Retention Period

All information collected is retained for the length of time required by our record retention policies or as required by law, whichever is longer.

Use of Personal Information

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

- To fulfill or meet the reason you provided the information. For example, we may review your education records as part of your employment application.
- To comply with our regulatory obligations as an employer.
- To provide you with support and respond to your inquiries, including investigating and addressing your concerns and monitoring and improving our responses.
- To create, maintain, customize, and secure your account with us, including detecting security incidents and debugging to identify and repair errors that impair existing functionality.
- To process your requests and other payments to and from you and prevent transactional fraud.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests, regulatory agency requests and as required or allowed by applicable laws, court order, rules, or regulations.
- As described to you when collecting your personal information or as otherwise set forth in the Act or as otherwise set forth in this Privacy Policy and any other Privacy Notice (for example, the business purposes set forth in the chart above).
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Zenith's assets in which personal information held by Zenith is among the assets transferred.
- To conduct fraud investigations and report fraud pursuant to applicable laws, court order, rules, or regulations.

Zenith 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. The business purposes listed above may also apply to the categories of personal information in the chart above.

We do not sell or share your personal information. We do not use your sensitive personal information for any purposes other than those which are permitted under the Act. We do not control the collection of your personal information by third parties.

Your Rights and Choices

Effective January 1, 2020, the Act provides consumers (California residents) with specific rights regarding their personal information. You have the right to know about personal information collected, disclosed, sold or shared. In addition, you have the right to request correction of inaccurate personal information and the right, subject to certain exceptions, to request deletion of personal information. You can learn more about your rights and how to exercise them by visiting our **Privacy Policy for California Residents** at <https://www.thezenith.com/zenith/privacy-center/privacy-policy-for-california-residents>.