



TCWGlobal Privacy Notice for California Residents

Last Modified: December 18, 2022

This Privacy Notice for California Residents supplements the information contained in WMBE Payrolling Inc. dba TCWGlobal's Privacy Policy (for www.tcwglobal.com and www.tcwprivacy.com collectively and individually referred to as our "Website") and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act ("CCPA") and California Privacy Rights Act ("CPRA"). Any terms defined in the CCPA and CPRA have the same meaning when used in this Privacy Notice.

This Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. Please visit tcwprivacy.com for more information on the privacy policy for StaffingNation or Webcenter for more details on how data collected through those systems and websites.

Information We Collect

Our Website collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, company, or device ("personal information"). We do not collect sensitive personal information on our Website. The table also list, for each category, our expected retention period, use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising. For more information on our data retention periods please visit www.tcwprivacy.com.

Personal Information Category	Expected Retention Period	Business Purpose	Sold or Shared
Identifiers: name, address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	7 years or until Individual opts out or deletion request received	TCWGlobal collects identifiers to respond to your questions or inquiries on our Website. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry.	Not Sold. May be shared to our service providers to the extent necessary for the provision of services on our behalf.
California Customer Records personal information: A name, signature, address, telephone	7 years or until Individual opts out or deletion request received	TCWGlobal collects identifiers to respond to your questions or inquiries on our Website. For example, if you share your name and contact information to	Not Sold. May be shared to our service providers to the extent necessary for the

number. Some personal information included in this category may overlap with other categories.		request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry.	provision of services on our behalf.
Protected classification characteristics under California or federal law	Not Collected	Not Collected	Not Collected
Commercial information	Not Collected	Not Collected	Not Collected
Biometric information	Not Collected	Not Collected	Not Collected
Internet or other similar network activity: Browsing history, search history, information on a consumer's interaction with a website, program, or advertisements.	7 years or until Individual opts out or deletion request received	TCWGlobal collects interaction data with the website and software in order to properly track usage, document acknowledgements or consents, and to monitor usage.	Not Sold. May be shared to our service providers to the extent necessary for the provision of services on our behalf.
Geolocation data	Not Collected	Not Collected	Not Collected
Sensory data	Not Collected	Not Collected	Not Collected
Professional or employment-related information: Current or past job history or performance evaluations.	Not Collected.	Not Collected	Not Collected
Non-public education information: Education records directly related to a student maintained by an educational institution or party acting on its behalf,	Not Collected.	Not Collected	Not Collected

such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records			
Inferences drawn from other personal information.	Not Collected	Not Collected	Not Collected

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

- Directly from you. For example, from forms you complete.
- Indirectly from you. For example, from observing your actions on our Website.

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, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to inquire about ordering a product or service, we will use that information to process your request. We may also save your information to facilitate new product advertisements or updates.
- To provide, support, personalize, and develop our Website, products, and services.
- To process your requests or questions
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- 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.

We 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.

Sharing Personal Information

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has not disclosed personal information for a business purpose.

Sales of Personal Information

In the preceding twelve (12) months, Company had not sold personal information

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- PLEASE NOTE TCWGLOBAL DOES NOT ENGAGE IN THE SALE OF PERSONAL INFORMATION)

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 888-388-8873
- Emailing us at privacy@tcwglobal.com
- Visiting www.tcwprivacy.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

PLEASE NOTE, TCWGLOBAL DOES NOT CURRENTLY SELL ANY PERSONAL INFORMATION. THERE IS NO NEED FOR CONSUMERS TO OPT-IN OR OPT-OUT AT THIS TIME.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents to request certain information regarding our disclosure of their information to third parties for the third parties for direct marketing purposes. To make such a request, please contact us by sending an email to privacy@tcwglobal.com

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which TCWGlobal collects and uses your information described here and in the TCWGlobal Website Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

WMBE Payrolling Inc. dba TCWGlobal
Attn: Privacy Office
3545 Aero Court
San Diego, Ca 92123
privacy@tcwglobal.com
(888)388-8873