



## StaffingNation Privacy Notice for California Residents

**Last Modified:** December 1, 2023

This Privacy Notice for California Residents supplements the information contained in StaffingNation's Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). WMBE Payrolling Inc. dba TCWGlobal and its affiliates ("TCWGlobal," "StaffingNation," "we," "us" or "our") 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](http://tcwprivacy.com) for more information our proprietary software, StaffingNation, and review the "California Employee and Job Applicant Privacy Notice Regarding The Collection of Personal Information" which details how that data collected.

### Information We Collect

StaffingNation 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 may collect the personal information and sensitive information categories listed in the tables below. The tables 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](http://www.tcwprivacy.com).

<b>Personal Information Category</b>	<b>Expected Retention Period</b>	<b>Business Purpose</b>	<b>Sold or Shared</b>
Identifiers: name, address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	Throughout contract period. Will be maintained after contract period for up to 7 years if included in TCWGlobal employee personnel file or part of accounting records.	TCWGlobal collects identifiers to allow you access to StaffingNation and provide services related to your contingent workforce. This information may also be used to provide you updates regarding service offerings and periodic notices. This information may also be incorporated into your contingent worker's records and personnel file.	Not Sold. May be shared with our service providers to the extent necessary for the provision of services on our behalf.
California Customer Records personal	Throughout contract period.	TCWGlobal collects to allow you access to StaffingNation	Not Sold. May be shared with

<p>information: A name, signature, address, telephone number, passport number, insurance policy number, any financial information. Some personal information included in this category may overlap with other categories.</p>	<p>Will be maintained after contract period for up to 7 years if included in TCWGlobal employee personnel file or part of accounting records.</p>	<p>and provide services related to your contingent workforce. This information may also be used to provide you updates regarding service offerings and periodic notices. This information may also be incorporated into your contingent worker's records and personnel file.</p>	<p>our service providers to the extent necessary for the provision of services on our behalf.</p>
<p>Protected classification characteristics under California or federal law</p>	<p>Not Collected</p>	<p>Not Collected</p>	<p>Not Collected</p>
<p>Commercial information</p>	<p>Not Collected</p>	<p>Not Collected</p>	<p>Not Collected</p>
<p>Biometric information</p>	<p>Not Collected</p>	<p>Not Collected</p>	<p>Not Collected</p>
<p>Internet or other similar network activity: Browsing history, search history, information on a consumer's interaction with a website, program, or advertisements.</p>	<p>Throughout contract period. Will be maintained after contract period for up to 7 years if included in TCWGlobal employee personnel file.</p>	<p>TCWGlobal collects interaction data with the website and software in order to properly track usage, document acknowledgements or consents, and to monitor usage.</p>	<p>Not Sold. May be shared with our service providers to the extent necessary for the provision of services on our behalf.</p>
<p>Geolocation data</p>	<p>7 years</p>	<p>TCWGlobal collects location information such as IP address to validate system usage within websites and programs.</p>	<p>No</p>
<p>Sensory data</p>	<p>Not Collected</p>	<p>Not Collected</p>	<p>No</p>
<p>Professional or employment-related information: Current or past job history or performance evaluations.</p>	<p>Throughout contract period. Will be maintained after contract period for up to 7 years if included in TCWGlobal</p>	<p>TCWGlobal may store or collect to provide services related to your contingent workforce. This information may also be incorporated into your contingent worker's records and personnel file.</p>	<p>No</p>

	employee personnel file.		
<p>Non-public education information:</p> <p>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</p>	<p>Throughout contract period. Will be maintained after contract period for up to 7 years if included in TCWGlobal employee personnel file.</p>	<p>TCWGlobal may store or collect to provide services related to your contingent workforce. This information may also be incorporated into your contingent worker's records and personnel file.</p>	No
<p>Inferences drawn from other personal information:</p> <p>Profile reflecting a person's preferences, characteristics, predispositions, attitudes, and abilities.</p>	<p>Throughout contract period. Will be maintained after contract period for up to 7 years if included in TCWGlobal employee personnel file.</p>	<p>TCWGlobal may collect a person's preferences, characteristics, abilities, or other information the system user provided through their profile within StaffingNation.</p>	No

<b>Sensitive Personal Information Category</b>	<b>Expected Retention Period</b>	<b>Business Purpose</b>	<b>Sold or Shared</b>
Government identifiers (social security, driver's license, state identification card, or passport number)	Not Collected	Not Collected	Not Collected
Complete account access credentials (usernames, passwords, and account numbers)	Throughout contract period. Financial information may be maintained	TCWGlobal collects account credential information to allow you access to StaffingNation and provide services related to your contingent workforce.	Not Sold. May be shared with our service providers to the extent necessary

	after contract period for up to 7 years if included in accounting records.	Financial information, such as banking information, may be used to process ACH transactions, accounting, and for auditing purposes.	for the provision of services on our behalf.
Precise geolocation	Not Collected	Not collected by TCWGlobal. Please note some of our clients will use alternative timekeeping tools that may use geolocation. Please review the timekeeping tools privacy policy and collection notices for more information.	No
Racial or ethnic origin	Not Collected	Not Collected	No
Religious or philosophical beliefs	Not Collected	Not Collected	Not Collected
Union membership	Not Collected	Not Collected	Not collected
Genetic data	Not Collected	Not Collected	Not Collected
Mail, email, or text messages contents not directed to us	Not Collected	Not Collected	Not Collected
Unique identifying biometric information	Not Collected	Not Collected	Not Collected
Health, sex life, or sexual orientation information	Not Collected	Not Collected	Not Collected

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

- Directly from you. For example, from forms you complete.
- Directly from our Clients or Vendors within our VMS platform

**Use of Personal Information**

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

- We use the Information you share and data we collect about you primarily for the legitimate interest of administering our business; (i) for registration and to manage your profile and listings, including to facilitate your access to and use of StaffingNation; (ii) to enable us to publish your submitted content; (iii) to respond to your questions and requests regarding customization or use of StaffingNation; (iv) to improve our product and service; (v) to resolve disputes and troubleshoot problems; (vii) to prevent prohibited



activities or breach of agreements; (viii) to enforce our policies; and as otherwise described to you at the point of collection or as part of our separate service agreements.

- 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 purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop StaffingNation, 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 StaffingNation, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve StaffingNation, 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.

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**

We may disclose your personal information to a third party for a business. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

#### ***Disclosures of Personal Information for a Business Purpose***

In the preceding twelve (12) months, StaffingNation has disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Professional or employment-related information.
- Non-public education information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.

### ***Sales of Personal Information***

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

### **Your Rights and Choices**

#### ***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.
10. Or if Employment Related Records within retention period.

### ***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](mailto:privacy@tcwglobal.com)
- Visiting [www.tcwprivacy.com](http://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](mailto: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 StaffingNation following the posting of changes constitutes your acceptance of such changes.**

### **Contact Information**

If you have any questions or comments about this Privacy Notice, the ways in which TCWGlobal collects and uses your information described here and in the StaffingNation 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:





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