



## **CALIFORNIA EMPLOYEE AND JOB APPLICANT PRIVACY NOTICE REGARDING THE COLLECTION OF PERSONAL INFORMATION**

Updated: December 19, 2024

WMBE Payrolling Inc. dba TCWGlobal and its affiliates (“TCWGlobal,” “StaffingNation,” “we,” “us” or “our”) adopt this Privacy Notice to California Employees and Job Applicants Regarding the Collection of Personal Information (the “Privacy 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. Employees and job applicants with disabilities may access this notice in an alternative format by calling the following toll-free phone number: 888-388-8873 or emailing [hello@tcwglobal.com](mailto:hello@tcwglobal.com).

TCWGlobal respects your privacy and takes your privacy seriously. We are committed to handling personal information responsibly and in compliance with applicable laws. As a Global Payrolling Provider and Employer of Record Service, in the course of our business, TCWGlobal will ask job applicants, prospective employees, and employees to provide personal information necessary relating to your employment or prospective employment. That information is obtained through StaffingNation, a TCWGlobal affiliate (Cloud Motion Technology LLC) owned proprietary Contingent Workforce Platform, which includes an onboarding and VMS and Talent Pool system and through Webcenter which is an integrated third-party software. This Privacy Notice describes how TCWGlobal collects and uses your personal information, the categories of personal information it collects, and instances where TCWGlobal may disclose your personal information to third parties. We will only collect and process your personal information in accordance with this Privacy Notice and our Privacy Policies which can be located at [www.tcwprivacy.com](http://www.tcwprivacy.com), unless otherwise required by applicable law.

If you are not an employee or job applicant, please review TCWGlobal’s Privacy Notice for California Residents.

### **Categories of Personal Information TCWGlobal Collects and How We Use It**

TCWGlobal collects and processes information from you for human resources, employment, and benefit administration purposes, and where necessary to comply with any local, state, and federal legal obligations. TCWGlobal obtains the categories of personal information listed below directly from you and the information you provide during your job application process with our clients or with our recruiters, your employee onboarding process, and during the selection of your benefits as an employee. In some cases, TCWGlobal may obtain a background check and/or consumer report from a consumer reporting agency once an offer of employment is made.

TCWGlobal will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without first providing you with additional and/or updated notice.

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>
<p>Identifiers: first and last name, your address, your email address, telephone number, date of birth, social security number, driver license number, passport number, and/or other government identification numbers, immigration and work authorization status, signature, and username and/or account name</p>	<p>7 years for employees</p>	<p>TCWGlobal collects this information to make an employment and/or job-related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment, to manage your employment relationship with us and for general employee administration and processing (including employee payroll and benefits administration), and to create, maintain, and secure your employee records and personnel file.</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>California Customer Records personal information: first and last name, your address, your email address, telephone number, date of birth, social security number, driver license number, passport number, and/or other government identification</p>	<p>7 years for employees</p>	<p>TCWGlobal collects this information to make an employment and/or job-related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment, to manage your employment relationship with us and for general employee administration and processing (including employee payroll and benefits administration), and to create, maintain, and secure your employee records and personnel file. Financial information, such as banking information, may be used for issuing payroll, processing work-related claims (for example, insurance or payment claims), and all related accounting and</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>numbers, immigration and work authorization status, signature, and username and/or account name. Financial information such as banking information for direct deposit, debit card number, credit card number, tax selections, pay rate, and payroll deduction information. Benefit selection and related information such as your benefit selection, social security number or other government identification number, date of birth, health insurance information, policy number, and selections.</p>		<p>auditing. TCWGlobal also collects this information to administer benefit related claims and for employment related HR processes.</p>	
<p>Protected classification characteristics under California or federal law: age, race, color, national origin, citizenship, marital status, physical or mental disability, sex (including gender, gender identity, gender</p>	<p>7 years for employees</p>	<p>TCWGlobal collects protected classification (ex. diversity information such as age, race, color, national origin, citizenship, marital status, physical or mental disability, sex (including gender, gender identity, gender expression), and veteran or military status) to comply with local, state, and federal laws and regulations, comply with reporting requirements as your employer, and for diversity initiatives.</p>	<p>Not Sold. May be shared with our service providers to the extent necessary for the provision of services</p>

expression), and veteran or military status			on our behalf
Commercial information: Products and services related to equipment purchases, food, lodging, and transportation.	7 years for employees	TCWGlobal may collect this information to provide reimbursement of expenses related to employment.	No
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 for employees	TCWGlobal collects interaction data with the website and software in order to properly track usage, stage in onboarding status, and document acknowledgements or consents.	No
Geolocation data	7 years for employees	TCWGlobal collects location information such as IP address to validate electronic signatures within websites and applications.	No
Sensory data	Not Collected	Not Collected	Not Collected
Professional or employment-related information: current or past employment history, employee status and title, job evaluations, employment status, job assignments, hours worked, training	7 years for information provided by employees or added to talent profile.  TCWGlobal has assess to prescreening results for 13 months. Our prescreening vendor retains	TCWGlobal may collect this information to make an employment and/or job related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment, to assess qualifications for a particular job or task, for education, training, and development requirements, and to gather evidence for disciplinary action or termination, for other human resource administration purposes, and to administer and process employee benefits.	No

<p>and development information, performance evaluation information, disciplinary and counseling information, background check information, drug test results, driving records, and termination information.</p>	<p>for 6 years to comply with FCRA</p>		
<p>Non-public education information: 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>TCWGlobal has assess to prescreening results for 13 months. Our prescreening vendor retains for 6 years to comply with FCRA</p>	<p>TCWGlobal may collect this information to evaluate and make an employment and/or job-related decision that involves you, to provide you with employment, to assess qualifications for an engagement.</p>	<p>No</p>
<p>Inferences drawn from other personal information</p>	<p>7 years for employees or until candidate opts out or deletes data within profile.</p>	<p>TCWGlobal may collect a person's preferences, characteristics, abilities, or other information through the individual's talent profile within StaffingNation.</p>	<p>No</p>
<p>Other Personal Information:</p>	<p>7 years for employees</p>	<ul style="list-style-type: none"> <li>Health and Safety Information such as health conditions, if relevant to your</li> </ul>	<p>Not Sold. May be</p>

<p>Profile reflecting a person's preferences, characteristics, predispositions, attitudes, and abilities.</p>		<p>employment, job restrictions, workplace accident and illness information, and health insurance policy information. TCWGlobal collects this information to maintain a safe workplace, assess your working capacity and make necessary accommodations, administer health and Worker's Compensation programs, and comply with applicable laws.</p> <ul style="list-style-type: none"> <li>• Beneficiary Information of your beneficiaries, such as name and contact information, relationship to you, birth date, social security or other government identification number, and any other information necessary to process any benefits claims. TCWGlobal collects this information to administer and process any related benefit claims.</li> <li>• Emergency Contact Information of person(s) you designate as your emergency contact(s) such as their name and contact information, and their relationship to you. TCWGlobal collects this information to maintain contact information should an emergency involving you arise during your employment.</li> </ul>	<p>shared with our service providers to the extent necessary for the provision of services on our behalf</p>
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<b>Sensitive Personal Information Category</b>	<b>Expected Retention Period</b>	<b>Business Purpose</b>	<b>Sold or Shared</b>
<p>Government identifiers (social security, driver's license, state identification card, or passport number)</p>	<p>7 years for employees</p>	<p>TCWGlobal collects this information to make an employment and/or job-related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment, to manage your employment relationship with us and for</p>	<p>Not Sold. May be shared with our service providers to the</p>

		general employee administration and processing (including employee payroll and benefits administration), and to create, maintain, and secure your employee records and personnel file.	extent necessary for the provision of services on our behalf
Complete account access credentials (usernames, account numbers, or paycard numbers)	7 years for employees	TCWGlobal collects this information to make an employment and/or job-related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment, to manage your employment relationship with us and for general employee administration and processing (including employee payroll and benefits administration), and to create, maintain, secure your employee records and personnel file, and to provide you access to our websites and applications. Financial information, such as banking information, may be used for issuing payroll, processing work-related claims (for example, insurance or payment claims), and all related accounting and auditing. TCWGlobal also collects this information to administer benefit related claims and for employment related HR processes.	
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.	Not Collected
Racial or ethnic origin	7 years for employees	TCWGlobal collects racial and ethnic origin information to comply with local, state, and federal laws and regulations, comply with required reporting as your employer, and for diversity initiatives.	Not Sold. May be shared with our service providers to the extent necessary for the

			provision of services on our behalf
Religious or philosophical beliefs	Not Collected	Not Collected	Not Collected
Union membership	Not Collected	Not Collected	Not Collected
Genetic data	Not Collected. If provided by employee directly, will be retained as part of personnel file for 7 years.	Not generally collected by TCWGlobal. However, if employee provides genetic data which is health related, if relevant to your employment, job restrictions, workplace accident and illness information, and health insurance policy information, TCWGlobal will only retain and use this information if necessary to maintain a safe workplace, assess your working capacity and make necessary accommodations, administer health and Worker's Compensation programs, and comply with applicable laws.	Not Sold. May be shared with our service providers to the extent necessary for the provision of services on our behalf.
Mail, email, or text messages contents not directed to us	Not Collected	Not Collected	No
Unique identifying biometric information	Not Collected	Not Collected	No
Health or sexual orientation information	7 years for employees	Health and Safety Information such as health conditions, if relevant to your employment, job restrictions, workplace accident and illness information, and health insurance policy information. TCWGlobal collects this information to maintain a safe workplace, assess your working capacity and make necessary accommodations, administer health and Worker's Compensation programs, and comply with applicable laws.  Sexual orientation information is not directly requested or collected. However,	Not Sold. May be shared with our service providers to the extent necessary for the provision of



		TCWGlobal may obtain information regarding marital status or domestic partner in order to provide and administer benefits to employees.	services on our behalf
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**TCWGlobal’s Disclosure of Personal Information to Third Parties**

TCWGlobal does not sell or otherwise disclose your personal information to any third parties for any monetary consideration.

We may disclose your personal data to the following categories of recipients:

(i) TCWGlobal affiliates: The Company may disclose your personal data to other TCWGlobal entities to fulfill the purposes described in this Notice. Within TCWGlobal entities, access to, use of and other processing of personal data will generally be limited to individuals who have a need to know the information for the purposes described in this Notice, which may include personnel from: Human Resources, IT, Compliance, Legal, Information Security, Finance and Accounting and Internal Audit. Most personnel within TCWGlobal will have access to your business contact information such as name, position, telephone number, work address and email address.

(ii) External service providers, such as (1) payroll and tax administrators, pensions and benefits providers and administrators, human resources administrators, IT systems and support providers, account monitoring services, financial institutions, telecommunications providers, insurance companies; (2) accountants, auditors, lawyers and other outside professional advisors; and (3) other third parties engaged to assist us in carrying out business, recruiting, or human resources activities. (4) data verification services to ensure your data is accurate and to reduce errors. We do not allow third party service providers to use or disclose your personal information except as necessary to perform services on our behalf or to comply with legal requirements.

(iii) Local authorities: TCWGlobal may share your personal data with local governmental, regulatory, supervisory and/or judicial agencies or other public or official bodies, as permitted or required under applicable law.

(iv) Business investors: Your personal data may be disclosed to potential investors and their advisors, auditors and legal counsel in connection with a corporate restructuring, sale or assignment of assets, merger, divestiture or other changes of control or financial status of the Company (including a reorganization, dissolution, or liquidation).

(v) Other third parties: Your personal data may be disclosed to third parties in circumstances where we are required to do so by law, regulation, or legal process (such as a court order or subpoena), or when we believe disclosure is necessary in order to achieve any purpose disclosed under this Notice.

**Changes to This Privacy Notice**

TCWGlobal reserves the right to update this Privacy Notice at any time and will provide you with a new Privacy Notice when and if any updates are made. If TCWGlobal would like to use your previously collected personal data for different purposes than those it notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal



data for a new or unrelated purpose. TCWGlobal may process your personal data without your knowledge or consent only where required by applicable law or regulation.

If you have any questions about this Privacy Notice, our privacy policies which can be located at [www.tcwprivacy.com](http://www.tcwprivacy.com), our practices, or the security of the StaffingNation Software, please contact us at [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com) or by calling (858)810-3000 or toll free (888)388-8873.

Or:

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