



California Privacy Notice

Last updated on 8.27.2024

This California Privacy Notice (the “CA Privacy Notice”) is published by Zambezi (the “Company”), in compliance with the California Consumer Privacy Act (“CCPA”), as modified by the California Privacy Rights Act (“CPRA” and together with the CCPA, collectively the “Privacy Laws”), and applies to all job applicants who are residents of the State of California (“You” or “Applicants”).

This CA Privacy Notice explains how the Company collects and processes your Personal Information (defined below) when you apply for a job with the Company. This CA Privacy Notice contains disclosures required by the Privacy Laws and applies only to “personal information” that is subject to such Privacy Laws. For example, this CA Privacy Notice does not apply to personal information that is exempted from the Privacy Laws, such as personal information covered by other privacy laws like the Health Insurance Portability and Accountability Act, the Confidentiality of Medical Information Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, or the California Financial Information Privacy Act.

Pursuant to the Privacy Laws, you have the right to know and understand the categories of Personal Information the Company collects about you, and the purposes for which the Company uses such Personal Information. The Company does not sell or otherwise disclose your Personal Information to any third parties for financial benefit or other consideration. For purposes of this CA Privacy Notice, “sold,” “sell,” or “sale” means the disclosure of personal information for monetary or other valuable consideration but does not include, for example, the transfer of personal information as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of the Company’s business.

1. Information the Company Collects.

The Company will collect certain Personal Information from Applicants in a variety of different situations, including but not limited to, from you, your computer or mobile device, through email, through the mail, and/or over the telephone. For purposes of this CA Privacy Notice, “Personal Information” has the meaning as defined in the CCPA, and includes information that is collected by the Company about you during the application process, and encompasses any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you.

More specifically, the Company may collect from Applicants the categories of Personal Information listed below, and how the Company uses that information will depend on the particular business purpose (described in “How The Company Use Personal Information”) for which the Company collects it.

Category	Examples of Personal Information that May Be Collected
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A. Personal Identifiers	Real name, alias, postal address, unique personal identifiers (such as device identifiers, cookies, beacons, pixel tags, mobile ad identifiers and similar technology), telephone number, online identifier, Internet Protocol (“IP”) address, email address, Social Security number, driver’s license number, passport number, date of birth, signature, physical characteristics or description, photographs, state identification card number, insurance policy number, education, or financial information.
B. Characteristics of Protected Classifications (pursuant to California and Federal law)	Race, color, gender (including gender identity and gender expression), sex (including perceived pregnancy, pregnancy, childbirth, or related medical conditions), breastfeeding or related conditions, reproductive health decision-making, sexual orientation, religious creed, religious dress, religious grooming, marital status, domestic partner status, age (over 40), national origin or ancestry, citizenship, physical or mental disability, medical condition (including cancer and genetic characteristics), genetic information, military or veteran status and military caregiver status. <i>The Company only collects this information if you voluntarily disclose it and as permitted by applicable law, and the Company will not use this information to make employment decisions.</i>
C. Professional or Employment-Related Information	Employment history, job application or resume, offer letter, drug testing paperwork and results, employment contract, disciplinary record, references, information about skills, abilities, accomplishments and awards.
D. Non-Public Education Information	Education history, education records (such as grades, report cards, transcripts and class lists) and other information included in your resume or cover letter.
E. Geolocation Data	Such as data that indicates your precise location (physical location and/or IP address).
F. Inferences Drawn from Other Personal Information	Such as data that the Company uses to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, preferences, behavior, attitudes, intelligence, abilities and aptitudes.
G. Sensitive Personal Information	As defined by the CPRA.

Personal Information does not include de-identified or aggregated consumer information.

The Company collects Personal Information you voluntarily provide when you contact the Company. Certain information may also be automatically collected, such as IP addresses and device identifiers.

Personal Information may also be collected from other sources including, but not limited to, professional references, pre-employment screening and background check services, credentialing and licensing organizations, publicly available sources, such as public social media profiles on LinkedIn, Twitter, Instagram or Facebook, and other sources as directed by you.

2. How The Company Uses Personal Information.

The Company may use or disclose the Personal Information it collects from you or about you for the following business purposes:

- **Recruitment and Processing and Managing Job Applications:** To process your job application, create an applicant profile, evaluate your qualifications, schedule and conduct interviews, evaluate, make and communicate with you regarding employment at the Company.
- **Conducting Pre-Employment Screening and Background Checks:** To conduct pre-employment screening and background checks.
- **General Human Resources Management:** To provide general HR management services, including management of on-boarding.
- **Compliance with Legal Requirements and Enforcement of Company Legal Rights:** To comply with applicable state and federal laws, regulations and legal processes (such as responding to subpoenas or court orders), respond to legal claims, resolve disputes, enforce the Company's legal rights contained in employment agreements or other contracts and comply with legal or regulatory recordkeeping requirements.

3. Your Rights Under The Privacy Laws

In accordance with Company policies and procedures, the Company will not discriminate or retaliate against you if you choose to exercise any of your rights under the Privacy Laws, which include the rights to: (1) know what Personal Information the Company may collect from you and why, (2) opt-out of Personal Information sharing, (3) correct inaccurate Personal Information, (4) delete Personal Information, and (5) limit the use and disclosure of Sensitive Personal Information (as defined by the CPRA).

The Privacy Laws provide California residents with specific rights regarding their personal information. This section describes your Privacy Law rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that the Company discloses certain information to you about its collection and use of your personal information over the past 12 months (the "right to know"). Once the Company receives your request and confirms your identity (see Exercising Your Rights to Know, Delete or Correct section below), the Company will disclose to you:

- The categories of personal information the Company collected about you.
- The categories of sources for the personal information the Company collected about you.
- The Company’s business or commercial purpose for collecting, sharing, or selling that personal information.
- The categories of third parties with whom the Company shares that personal information.
- If the Company sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information the Company collected about you (also called a data portability request).

Right to Delete

You have the right to request that the Company deletes any of your personal information that the Company collected and retained, subject to certain exceptions (the “right to delete”). Once the Company receives your request and confirms your identity (see Exercising Your Rights to Know, Delete or Correct section below), the Company will review your request to see if an exception allowing it to retain the information applies. The Company may deny your deletion request if retaining the information is necessary for the Company or the Company’s service provider(s) to:

- Complete the transaction for which the Company collected the personal information, take actions reasonably anticipated within the context of the Company’s ongoing business relationship with you, or otherwise perform the Company’s contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Exercise free speech, ensure the right of another employee to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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.
- Enable solely internal uses that are reasonably aligned with employee expectations based on your relationship with us.
- Comply with a legal obligation.

- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Upon your request, the Company will delete or de-identify personal information not subject to one of these exceptions from its records and will direct the Company's service providers to take similar action.

Right to Correct Inaccurate Personal Information

You have the right to request that the Company correct inaccurate personal information that it collected from you and retained, subject to certain exceptions (the "right to correct"). Once the Company receives your request and confirms your identity (see Exercising Your Rights to Know, Delete or Correct section below), the Company will review your request and use commercially reasonable efforts to make the requested corrections.

Exercising Your Rights to Know, Delete or Correct

To exercise your rights to know, delete or correct inaccurate personal information described above, please submit a request via the Company's toll free telephone number 888.970.1428, or by using the contact information provided below.

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may also make a request to know or delete on behalf of your child by submitting a request as described above.

You may only submit a request to know, delete, or correct twice within a 12-month period. Your request to know, correct, or delete must:

- Provide sufficient information that allows the Company to reasonably verify you are the person about whom the Company collected personal information or an authorized representative, and
- Describe your request with sufficient detail that allows the Company to properly understand, evaluate, and respond to it.

The Company cannot respond to your request or provide you with personal information if it cannot verify your identity or authority to make the request and confirm that the personal information relates to you.

Authorized Agent Disclosure. You may use an authorized agent to submit a request to opt-out of sale/sharing on your behalf if you provide the authorized agent written permission signed by you. The Company may deny a request from an authorized agent if the agent does not provide to the Company your signed permission demonstrating that they have been authorized by you to act on your behalf.

Response Timing and Format. The Company will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact the Company using the information provided below.

The Company endeavors to substantively respond to a verifiable employee request within forty-five (45) days of its receipt. If the Company requires more time (up to another 45 days), the Company will inform you of the reason and extension period in writing.

Any disclosures the Company provide will only cover the 12-month period preceding the Company's receipt of your request. The response the Company provides will also explain the reasons the Company cannot comply with a request, if applicable. For data portability requests, the Company 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.

The Company does not charge a fee to process or respond to your verifiable employee request unless it is excessive, repetitive, or manifestly unfounded. If the Company determines that the request warrants a fee, the Company will tell you why it made that decision and provide you with a cost estimate before completing your request.

4. Company Disclosure of Personal Information.

The Company may also disclose (and have disclosed in the past 12 months) your Personal Information for the business purposes described in this CA Privacy Notice with the following parties:

- **Service Providers:** The Company may share your Personal Information with service providers who assist the Company with running Company operations, and similar activities. Such service providers may include, but are not limited to, recruiters, pre-employment screening services, background check providers and others.
- **Governmental Authorities:** As required by law or legal process, the Company may share your Personal Information with federal or state regulatory agencies, law enforcement, courts and other governmental authorities.
- **Professional Advisors:** The Company may share your Personal Information with its professional advisors, such as auditors.
- **Affiliates:** The Company may share your Personal Information with Company affiliates (if applicable).

This CA Privacy Notice will be updated at least once every twelve (12) months to reflect changes in the Company's business, legal or regulatory obligations. The Company will only retain Personal Information for as long as is necessary to accomplish the particular business purpose(s) for which the Personal Information was originally collected. The Company will not collect additional categories of your Personal Information or use your Personal Information already collected for additional purposes without providing you with a notice of its intent to do so. Changes to this CA Privacy Notice will be effective from the date they are communicated to you. If the Company makes any material changes to this CA Privacy Notice, the Company will notify you before such changes are effective at the email address you have provided.

Contact Us. If you have any questions or comments about this notice, the ways in which the Company collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights, please do not hesitate to contact the Company at:

Phone: 888.970.1428

Email: privacy@zmbz.com

Postal Address:

3522 Hayden Ave., Culver City, CA 90232

Attn: Stephanie Ramos, People Department