

CALIFORNIA CONSUMER PRIVACY ACT NOTICE

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS applies to employees, applicants for employment, and independent contractors who reside in the State of California (“consumers” or “you”). The purpose of this Notice is to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category of Personal Information	Examples	Collected
A. Identifiers	Name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers	Yes
B. Customer Records	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	Yes
C. Protected classification characteristics under California or federal law	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex, gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions, sexual orientation, veteran or military status, genetic information	Yes
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	No

Category of Personal Information	Examples	Collected
E. Biometric information	Physiological, biological, or behavioral characteristics, including DNA, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information	No
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	Yes
G. Geolocation data	Data about physical location or movements	No
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	No
I. Professional or employment-related information	Information related to current or past job history or performance	Yes
J. Educational information	Non-public educational records maintained by or on behalf of an educational institution that is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty	No
K. Consumer Profile	Inferences drawn from personal information collected to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	No

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

- Information excluded from the CCPA's scope, such as:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data.

We obtain the categories of personal information listed above from the following categories of sources:

- Through our online portal from job applicants and employees. For example, when individuals apply for job positions directly through our online portal, when we collect data from new hires for our files and in connection with benefits applications, and as required by various federal laws, such as for EEO reporting.
- Through our online portal and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically. Indirectly from you when you visit and interact with our website.
- Indirectly from third party recruiters and background check providers.
- Indirectly from information internal human resource processes, such as employee performance evaluations.

Use of Personal Information

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

- For the administration of employee hiring, performance reviews, administration of employee payroll, processing of employment benefit claims, and for the purposes of complying with all applicable tax reporting, labor and employment laws.
- To administer employee benefits.
- To be able to contact you for purposes related to your employment, potential employment, or other business relationship with us.
- To help maintain the safety, security, and integrity of our systems, App or Website, services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

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.

Disclosure of Personal Information

We may disclose your personal information to a third party for a business purpose. 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.

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

- Category A: Identifiers
- Category B: Customer Records
- Category C: Protected Classifications

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

- Service providers
- Third parties with whom you direct us to share your personal information
- Other third parties such as consumer reporting agencies when we perform employee background screenings
- Governmental agencies, such as tax agencies

Sale of Personal Information

In the preceding twelve (12) months, we have not sold any personal information.

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 notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (818) 676-2300

Website: www.spirent.com

Email: Spirent.HRCommunication@spirent.com