

CenTrak, Inc.
Privacy Notice – California Employees

This Notice was last updated on November 17, 2022.

This **Privacy Notice** (“Notice”) is provided by **CenTrak, Inc.** (referred to herein as “CenTrak”, “we”, “us” or “our”).

Pursuant to California law, if you are a California resident and an employee, owner, director, officer, or contractor of CenTrak (“Personnel”, “you” or “your”), then you have a right to know what categories of personal information will be collected about you and the purposes for which the categories of personal information will be used.

The left column of the table below outlines the categories of information collected and used by CenTrak. The right column lists the purpose for which the information is collected or used; click on each purpose for more information. For any questions or comments about this Notice, please contact CenTrak Human Resources, HR@centrak.com. Note that some personal information included in a category may overlap with other categories.

Categories of Personal Information CenTrak Collects or Uses	Business or Commercial Purpose
A. Sensitive Identifiers (such as date of birth, driver’s license number or state identification number, passport number, Social Security number, medical information, bank account number, insurance policy number)	HR and Personnel Functions
B. Identifiers (such as name, title, telephone number, age, mailing address, email address, internet protocol address, or a unique number assigned to identify the device used to access information, systems, or a website)	HR and Personnel Functions Employee Health and Safety Security, Compliance, and Business Continuity Corporate and Legal Activities
B. Categories of personal information outlined in Section 1798.80(e) (such as 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)	HR and Personnel Functions Employee Health and Safety
C. Characteristics of protected classifications under California or federal law (such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information))	HR and Personnel Functions Employee Health and Safety Benchmarking and Analytics
F. Internet or other electronic network activity on CenTrak owned devices (such as browsing history, browser type and version, search	Security, Compliance, and Business Continuity

Categories of Personal Information CenTrak Collects or Uses	Business or Commercial Purpose
<p>history, applications installed, software updates installed, email content, file and document content, and other information regarding Personnel's interaction with an internet website, CenTrak network, systems, or information)</p>	<p>Benchmarking and Analytics</p> <p>Corporate and Legal Activities</p> <p>HR and Personnel Functions</p>
<p>G. Electronic activity on Personnel's device, such as computer, tablet or other mobile device (such as device type used to access CenTrak network, systems or information, device identifier including device name, model, serial number, storage amount total and free, IMEI, MAC address, and operating system, CenTrak-managed applications installed on Personnel's device and the information and activities therein. <i>Please note that we never collect your browsing history, calling history, text messages, contacts, passwords to personal accounts, personal calendar events, or photos from a personal device belonging to you. Refer to the T011 Acceptable Use Policy for more information.</i></p>	<p>Security, Compliance, and Business Continuity</p>
<p>H. Geolocation data (such as physical location or movements collected when accessing CenTrak networks, information, or systems)</p>	<p>Security, Compliance, and Business Continuity</p> <p>HR and Personnel Functions</p>
<p>H. Sensory or audio-visual data (such as audio, electronic, visual, thermal, olfactory or similar information, such as video recordings from CenTrak meetings)</p>	<p>HR and Personnel Functions</p>
<p>I. Professional or employment-related information (such as list examples like education history and employment information including your employment history, language skills and professional qualifications, other information included on your resume or CV)</p>	<p>HR and Personnel Functions</p>
<p>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</p>	<p>HR and Personnel Functions</p>
<p>K. Inferences drawn from other personal information (such as profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, such as applicant screening)</p>	<p>HR and Personnel Functions</p>
<p>L. Security Data (such as facility access data and on-premise video monitoring, photo IDs used for identity verification and security purposes)</p>	<p>Employee Health and Safety</p>
<p>M. Referral Information (such as whether you were referred to a CenTrak position by LinkedIn or through a recruiter)</p>	<p>HR and Personnel Functions</p> <p>Benchmarking and Analytics</p>

The business or commercial purpose for which CenTrak may use or disclose the above data types include:

HR and Personnel Functions

- To conduct background checks and other employment screening
- To manage your relationship with CenTrak, such as for:
 - o Onboarding
 - o Communication
 - o Timekeeping, payroll, bonus, taxation, business reimbursements, and expense report administration
 - o Business travel
 - o Managing and administering employee equity programs
 - o Employee benefits
 - o Training and development
 - o Performance evaluations
 - o Managing sick or disability leaves
 - o Managing personal time off
 - o Providing employment references
 - o Creating, maintaining and servicing online employee accounts
 - o Verification purposes
 - o Workers' compensation claims
 - o Career planning
 - o Personnel surveys
- Coordinating internal events and facilitating Personnel appreciation
- Reaching your emergency contacts in the event of an emergency
- Provide Personnel with, or obtain for Personnel, medical care in the event Personnel is injured or become ill while on-site at one of CenTrak's facilities or at a CenTrak event
- Workforce administration and planning, including capacity utilization planning, staffing and resource allocation
- Maintaining a corporate directory
- Prevent, detect, and prosecute fraud and other unlawful activity

Employee Health and Safety

- For public health reporting and disease preventing
- Health screening
- Covid and other serious communicable disease exposure notifications
- COVID-19 diagnosis and vaccination related information (and any diagnosis or vaccination related information for any other serious communicable disease). For more information

regarding the Company's practices regarding COVID-19 and other communicable diseases, please see our COVID-19 Vaccination Policy (effective September 8, 2021).

Security, Compliance, and Business Continuity

- To manage and monitor employee access to CenTrak facilities, equipment, systems, and information to ensure compliance with applicable laws, regulatory requirements, and applicable CenTrak policies and procedures
- To conduct internal audits and workplace investigations
- To investigate potential breaches of and enforce compliance with CenTrak policies and procedures
- To detect security incidents
- To protect against malicious, deceptive, fraudulent or illegal activity and to prosecute those responsible for that activity
- Promoting safe, secure and efficient use of messaging (e.g., email and other messaging platforms) and the Internet using CenTrak resources or in the scope of work for CenTrak, including ensuring that business-critical information and assets of CenTrak are protected and secure
- Ensuring business continuity including, for example, providing access to business email accounts to other CenTrak employees during a leave of absence or after the termination of employment

Benchmarking and Analytics

- To perform workplace analytics, data analytics and benchmarking
- In connection with equality opportunity and diversity initiatives and obligations
- To manage requirements by state or federal government laws or government contracting requirements

Corporate and Legal Activities

- To comply with applicable laws and regulations
- To maintain commercial insurance policies and coverages
- To engage in a potential corporate transaction (e.g., merger, acquisition, joint venture) requiring review of employee records
- To administer and maintain CenTrak's operations (e.g., for safety purposes)
- To exercise or defend the legal rights of CenTrak and its employees, contractors and agents
- Complying with government contracting reporting requirements
- Marketing CenTrak to customers and potential customers in the ordinary course of business
- To discover and automate processes

Changes to this Privacy Notice.

This Privacy Notice may be amended consistent with the requirements of applicable law. When CenTrak updates this Privacy Notice, it will also revise the "Last Updated" date at the top of this document. Check back periodically as we will make updates to this Privacy Notice and revise the date updated to indicate the date last updated. The Privacy Notice will be posted on CenTrak's intranet.

Contact Information.

Questions, comments, or complaints regarding this Privacy Notice or CenTrak processing practices can be emailed or mailed to any of these two places:

CenTrak, Attn: Human Resources
HR@centrak.com

or

CenTrak, Attn: Legal Department
Legal@centrak.com