

## **CALIFORNIA CONSUMER PRIVACY ACT EMPLOYEE AND JOB APPLICANT PRIVACY NOTICE**

LAST REVISED DATE: APRIL 30, 2024

FASHIONPHILE Group, LLC (the “Company”) is committed to protecting the privacy and security of the personal information you provide to us. Please read this Employee and Job Applicant Privacy Notice (the “Privacy Notice”) to learn how we collect and process your personal information when you provide it to us or apply for a job or other role with us. As an employee or job applicant, you have the right to know and understand the categories of personal information we collect about you, and the purposes for which we use such personal information, pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (the “CCPA”). **This Privacy Notice only applies to job applicants and employees who are residents of the State of California.** The Company does not sell or otherwise disclose this personal information for monetary or other consideration to any third parties or share it with third parties for cross-context behavioral advertising.

To view our full privacy policy, visit <https://help.fashionphile.com/s/privacy-policy>

### **CATEGORIES OF PERSONAL INFORMATION COLLECTED**

In each case as permitted by applicable law, we collect the following categories of personal information for the purposes described below. We retain each category of personal information below in accordance with applicable legal regulations and our document retention policies and as long as we need to process your candidacy and/or perform human resources functions.

<b>Personal Information Category</b>	<b>Business Purpose</b>	<b>Sold or Shared</b>
<b>Identifiers</b> , such as your full name, contact information, gender, date of birth, signature, Social Security number, driver's license or state identification numbers, and similar information for	<ul style="list-style-type: none"><li>Recruit and process employment applications, including verifying eligibility for employment and conducting background and related checks</li></ul>	No

<p>your dependents and beneficiaries.</p>	<ul style="list-style-type: none"><li>• Conduct employee onboarding</li><li>• Maintain and administer payroll and employee benefit plans, including enrollment and claims handling</li><li>• Maintain personnel records and complying with record retention requirements</li><li>• Provide employees with human resources management services and employee data maintenance and support services</li><li>• Communicate with employees and their emergency contacts and plan beneficiaries</li><li>• Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws</li><li>• Prevent unauthorized access to or use of the Company property, including information systems, electronic devices, network, and data</li><li>• Ensure employee productivity and adherence to Company policies</li><li>• Conduct internal audits and investigate</li></ul>	
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	<p>complaints, grievances, and suspected violations of Firm policy</p> <ul style="list-style-type: none"> <li>• Respond to law enforcement requests and as required by applicable law or court order</li> <li>• Exercise or defend the legal rights of the Company and its employees</li> </ul>	
<p><b>California Customer Records employment and personal information</b>, such as your name, signature, Social Security number, physical characteristics or description, photograph, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, current employment, employment history, membership in professional organizations, licenses and certifications, bank account number, credit card number, debit card number, or any other financial, medical or health insurance information.</p>	<ul style="list-style-type: none"> <li>• Same purposes as for identifiers category</li> </ul>	<p>No</p>
<p><b>Protected classification characteristics under California or federal law</b>, 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</p>	<ul style="list-style-type: none"> <li>• Comply with federal and state equal employment opportunity laws</li> <li>• Design, implement, and promote the Company's diversity and inclusion programs</li> <li>• Perform workforce analytics, data analytics, and benchmarking</li> </ul>	<p>No</p>

<p>related medical conditions), sexual orientation, reproductive health decisionmaking, military and veteran status, or genetic information (including familial genetic information).</p>	<ul style="list-style-type: none"> <li>• Conduct internal audits, grievances, and suspected violations of Company policy</li> <li>• Exercise or defend the legal rights of the Company and its employees</li> </ul>	
<p><b>Commercial information,</b> such as transaction information, purchase history, and financial details.</p>	<ul style="list-style-type: none"> <li>• Respond to law enforcement requests and as required by applicable law or court order]</li> <li>• To fulfill orders and administer employee discount programs</li> </ul>	<p>Yes</p>
<p><b>Internet or other similar network activity information,</b> including all activity on the Company's information systems (such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames, and passwords) and all activity on communications systems (such as phone calls, call logs, voicemails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee's use of company-issued devices).</p>	<ul style="list-style-type: none"> <li>• Facilitate the efficient and secure use of Company information systems</li> <li>• Ensure compliance with Company information systems policies and procedures.</li> <li>• Comply with applicable state and federal laws</li> <li>• Prevent unauthorized access to, use, or disclosure or removal of the Company's property, records, data, and information</li> <li>• Enhance employee productivity</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Firm policy</li> <li>• Exercise or defend the legal rights of the</li> </ul>	<p>No</p>

	Company and its employees, customers and contractors	
<b>Geolocation data</b> , such as the time and physical location related to use of an internet website, application, or device	<ul style="list-style-type: none"> <li>• Improve safety of employees, customers, and the public regarding use of the Company property and equipment</li> <li>• Prevent unauthorized access, use, or loss of the Company property</li> <li>• Improve efficiency, logistics, and supply chain management</li> <li>• Ensure employee productivity and adherence to the Company's policies</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company's policy</li> </ul>	No
<b>Surveillance data</b> , call monitoring and video surveillance.	<ul style="list-style-type: none"> <li>• Comply with applicable state and federal laws, including on workplace health and safety</li> <li>• Prevent unauthorized access, use, or loss of the Company property</li> <li>• Improve customer service</li> <li>• Exercise or defend the legal rights of the Company and its employees, customers</li> </ul>	The Company may use and share call recordings for quality assurance and to improve customer service

<p><b>Professional or employment-related information</b>, such as employment application information (work history, academic and professional qualifications, educational records, references, and interview notes, background check, drug testing results, work authorization, performance and disciplinary records, salary, bonus, commission, and other similar compensation data, benefit plan enrollment, participation, and claims information, leave of absence information including religious, military and family obligations, health data concerning employee and their family members.</p>	<ul style="list-style-type: none"> <li>• Recruit and process employment applications, including verifying eligibility for employment, background checks, and onboarding</li> <li>• Design and administer employee benefit plans and programs, including for leaves of absence.</li> <li>• Maintain personnel records and comply with record retention requirements.</li> <li>• Communicate with employees and their emergency contacts and plan beneficiaries.</li> <li>• Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws.</li> <li>• Prevent unauthorized access to or use of the Company's property, including its information systems, electronic devices, network, and data.</li> <li>• Ensure employee productivity and adherence to the Company policies.</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company policy.</li> </ul>	<p>No</p>
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	<ul style="list-style-type: none"> <li>Evaluate and provide useful feedback about job performance, facilitate better working relationships, and for employee professional development</li> <li>Exercise or defend the legal rights of the Company and its employees, customers and contractors</li> </ul>	
<p><b>Non-public education information</b>, such as education records, degrees and vocational certifications obtained, report cards, and transcripts.</p>	<ul style="list-style-type: none"> <li>Evaluate an individual's appropriateness for hire, or promotion or transfer to a new position at the Company.</li> </ul>	No
<p><b>Inferences drawn from other personal information to create a profile or summary</b>, for example, an individual's preferences, abilities, aptitudes, and characteristics.</p>	<ul style="list-style-type: none"> <li>Engage in human capital analytics, including to identify correlations about individuals and job success, analyze data to improve retention and productivity, and analyze employee preferences to inform human resources policies and procedures</li> <li>Conduct applicant reference checks to assist in hiring decisions</li> </ul>	No
<p>OTHER - Job interview notes, responses to screening questions, assessment results, and any other information you provide in connection with the recruitment process</p>	<p>Same purposes as for identifiers category</p>	No

Sensitive personal information is a subtype of personal information consisting of specific information categories. We may collect or use information that falls with the sensitive personal information categories listed in the table below to infer characteristics about a person. We retain each category of sensitive personal information below in accordance with applicable legal regulations and our document retention policies and as long as we need to process your candidacy and/or perform human resources functions discussed further below.

<b>Sensitive Personal Information Category</b>	<b>Business Purpose</b>	<b>Sold or Shared</b>
<p><b>Government identifiers</b>, such as your Social Security number, driver's license, state identification card, and passport and visa information, and immigration status and documentation.</p>	<ul style="list-style-type: none"> <li>• Recruit and process employment applications, including verify eligibility for employment and conducting background and related checks</li> <li>• Process and administer payroll and employee benefit plans, including enrollment and claims handling</li> <li>• Maintain personnel records and comply with record retention requirements</li> <li>• Provide employees with human resources management services and employee data maintenance and support services</li> <li>• Communicate with employees and their emergency contacts and plan beneficiaries</li> <li>• Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws</li> <li>• Prevent unauthorized access to or use of the Company property, including information systems, electronic devices, network, and data</li> <li>• Respond to law enforcement requests and as required by applicable law or court order</li> </ul>	<p>No</p>



<p><b>Precise geolocation</b>, such as physical access to a Company office location, or the location of a delivery, sales, or other employee in the field.</p>	<ul style="list-style-type: none"> <li>• Improve safety of employees, customers, and the public regarding use of the Company property and equipment</li> <li>• Prevent unauthorized access, use, or loss of the Company property</li> <li>• Improve efficiency, logistics, and supply chain management</li> <li>• Ensure employee productivity and adherence to the Company's policies</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company's policy</li> <li>• Exercise or defend the legal rights of the Company and its employees, customer and contractors</li> </ul>	<p>No</p>
<p><b>Racial or ethnic origin.</b></p>	<ul style="list-style-type: none"> <li>• Comply with federal and state equal employment opportunity laws</li> <li>• Design, implement, and promote the Company's diversity and inclusion programs</li> <li>• Perform workforce analytics, data analytics, and benchmarking</li> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of Company policy</li> </ul>	<p>No</p>
<p><b>Citizenship or immigration information.</b></p>	<ul style="list-style-type: none"> <li>• Comply with federal and state equal employment opportunity and immigration laws</li> <li>• Verify employment eligibility (Form I-9)</li> </ul>	<p>No</p>
<p><b>Religious or philosophical beliefs.</b></p>	<ul style="list-style-type: none"> <li>• Review and process religious reasonable accommodation requests</li> <li>• Exercise or defend the legal rights of the Company and its employees,</li> </ul>	<p>No</p>

	customers and contractors, and agents	
<b>Mail, email, or text messages contents not directed to the Company.</b>	<ul style="list-style-type: none"> <li>• Conduct internal audits and investigate complaints, grievances, and suspected violations of the Company policy</li> <li>• Exercise or defend the legal rights of the Company and its employees, customers and contractors</li> </ul>	No
<b>Health information</b> , including job restrictions and workplace illness and injury information.	<ul style="list-style-type: none"> <li>• Investigate and process workers' compensation claims</li> <li>• Process health insurance claims</li> <li>• Conduct and process employment testing</li> <li>• Ensure equal access to retirement programs and fertility planning by same-sex spouses</li> <li>• Ensure equal family leave policies and insurance for transgender surgeries</li> </ul>	No
<b>Sex life or sexual orientation information.</b>	<ul style="list-style-type: none"> <li>• Process health insurance claims</li> <li>• Ensure equal access to retirement programs and fertility planning by same-sex spouses</li> <li>• Ensure equal family leave policies and insurance for transgender surgeries</li> </ul>	No

**SOURCES OF PERSONAL INFORMATION**

We collect personal information you voluntarily provide to us when you apply for a job or otherwise provide it to us in the recruitment or employment or human resources context. If you are visiting our website or online job application, we may also automatically collect device information such as IP addresses and device identifiers.

We may also combine personal information collected from other sources with the personal information that you provide to us. For example, we may collect information from:

- Recruiters
- Prior employers (e.g., for references)
- Professional references you provide to us
- Educational institutions
- Pre-employment screening services
- Credentialing and licensing organizations
- Other sources as directed by you

## **DISCLOSURE OF PERSONAL INFORMATION**

We may share your personal information as necessary for the purposes described in this Privacy Notice, including internally with our personnel involved in the hiring process. For example, we share your personal information with the following parties:

- **Service Providers:** We use service providers to operate, host and facilitate our hiring and recruitment process. These include hosting, technology and communication providers; security and fraud prevention consultants; analytics providers; background and reference check screening services; and hiring process management tools.
- **Government authorities and law enforcement:** In certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- **Business transfers:** Your personal information may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).
- **Professional advisors:** We may share your personal information with our professional advisors.
- **Other:** We may also share your personal information with third parties in conjunction with exercising or defending the legal rights of the Company and its employees.

## **CONTACT FOR QUESTIONS**

If you have any questions or concerns regarding this Privacy Notice or the collection of your personal information, please contact [hr@fashionphile.com](mailto:hr@fashionphile.com).