



CALIFORNIA JOB APPLICANT PRIVACY NOTICE

Effective Date: June 1, 2025

This California Job Applicant Privacy Notice ("**Applicant Notice**") describes the types of personal information WTS Paradigm, LLC along with our subsidiaries and affiliates (collectively, "**Paradigm**," "**we**," "**our**," or "**us**") may obtain about California job applicants ("**Applicants**") during our recruitment process, including through our careers website [https:// https://myparadigm.com/careers/](https://myparadigm.com/careers/) (the "**Site**"). This Applicant Notice explains how we process Applicant Personal Information and Applicants' rights relating to personal information under the California Consumer Privacy Act (the "**CCPA**").

As used in this Applicant Notice, the term "**personal information**" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

PERSONAL INFORMATION WE OBTAIN

We may obtain the following types of personal information through various means, including directly from you; automatically through our Site's interaction with your browser and devices; from our service providers or third parties; or from publicly available resources, such as professional websites, depending on how you interact with us:

- **Identifiers**, such as name, email address, phone number, fax number, pager number, driver's license number, postal address, IP address, Site login credentials, and online identifiers.
- **Personal Records**, such as education, employment, and employment history.
- **Characteristics of Protected Classifications**, such as gender and race.
- **Internet or other electronic network activity information**, such as browser type, operating system type or mobile device model; viewed webpages, links that are clicked, and movement of the mouse or pointer; websites or apps visited before coming to our Site; the amount of time you spend viewing or using the Site and the pages visited, the number of times you return, or other click-stream or Site usage data; and emails we send that you open, forward, or click through to our Site; type of device (such as laptop or smart phone); and device cookie settings and other device details (such as MAC address).
- **Professional or Employment Information**, such as your skills, qualifications, work experience, references, recommendations, and other information included in a resume, CV, application form, or cover letter, and information relating to professional licenses, training, disciplinary actions, and membership in professional organizations.
- **Geolocation data**, such as location data inferred from your device IP address.
- **Sensory data**, including closed-circuit images, video, and audio recordings as may relate to your application.
- **Inferences** used to create a profile reflecting preferences, characteristics, behavior, and attitudes.

If you provide us with personal information about other individuals (such as your references or the principals of your company), you represent that you have notified and obtained consent from the relevant individuals to provide us with their information for the applicable purpose. Please do not provide us with information about third parties unless you have notified them.

HOW WE USE PERSONAL INFORMATION

We may use personal information for:

- **Managing the Recruitment Process**, such as opening and maintaining your application records, assessing your eligibility for employment, and reimbursing you for expenses incurred when you travel for an interview.
- **Communications**, such as corresponding with you regarding your application and our recruitment initiatives.
- **Operating our Careers Website**, such as making sure our Site technology functions, setting default options, providing you with a better application experience, improving our Site, diagnosing technical and service problems, administering our Site, identifying users of our Site, and developing statistics on engagement with our Site.
- **Security and Integrity**, such as protecting the security or integrity of the Site and our business; protecting against, identifying, and preventing fraud and other unlawful activity; complying with and enforcing applicable legal requirements, relevant industry standards and our policies, including our Terms of Use; performing investigations; managing risk exposure, including by identifying potential hackers and other unauthorized users; complying with requests by law enforcement or government authorities; and for other legal and compliance reasons.
- We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

HOW WE DISCLOSE PERSONAL INFORMATION

We may disclose personal information to the following parties:

- **Our Family of Brands**, including our affiliates, subsidiaries, and other related entities that may process your personal information as described in this Applicant Notice.
- **Service Providers, Vendors, and Suppliers** that we engage to provide services on our behalf, such as support for our Site operations, application process, electronic mail, conducting analysis to improve our Site, research, and responding to questions.
- **Corporate Transaction Partners**, including to prospective or actual purchasers, investors, or successor entities in connection with a contemplated reorganization or an actual reorganization of our business, in connection with financing, a sale, reorganization, dissolution, liquidation, or other transactions involving the disposal of all or part of our business or assets, including for the purpose of permitting the due diligence required to decide whether to proceed with a transaction.
- **Law Enforcement, Government or Regulatory Bodies, or Other Authorized Parties** in order to comply with laws, regulations, subpoenas, court orders, or other legal obligations; assist in investigations; protect and defend our rights and property or the rights or safety of other parties; enforce our Terms of Use, this Applicant Notice, or agreements with third parties; or prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity.
- **Parties with Your Notice or Consent** when we have provided specific notice to you or asked for your consent, as applicable.

We may combine your personal information with data we obtain from our Site, our services, other users, or other parties. We reserve the right to convert, or permit others to convert, your personal information into deidentified, anonymized, or aggregated data, as permitted by law.

HOW WE PROTECT PERSONAL INFORMATION

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

RECORD RETENTION

We may retain your personal information for as long as necessary to fulfil the purpose for which it was collected or a disclosed purpose that is reasonably compatible with the context in which the personal information was collected, to manage our operations, as reasonably required to protect or defend our rights or property, to comply

with legal or regulatory requirements, or as otherwise permitted by law.

We strive to retain your personal information no longer than is reasonably necessary to carry out the purposes listed in this Applicant Notice or as required by law. Where personal information is used for more than one purpose, we will retain it until the purpose with the latest retention period expires. We retain your personal information in accordance with applicable law and internal document retention practices. For more information about our retention policies, please contact us using the contact details in the How To Contact Us section.

SELLING AND SHARING PERSONAL INFORMATION

We do not sell Applicant personal information or share it for cross-context behavioral advertising.

CALIFORNIA PRIVACY RIGHTS

California Applicants have the following rights under the CCPA:

Right to Know. You have the right to know what personal information we have collected about you, which includes:

- (1) The categories of personal information we have collected about you, including:
 - a. The categories of sources from which the personal information was collected;
 - b. Our business purposes for collecting or disclosing personal information;
 - c. The categories of recipients to which we disclose personal information;
 - d. The categories of personal information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of personal information; and
- (2) The specific pieces of personal information we have collected about you

Right to Delete Your Personal Information. You have the right to request that we delete personal information we collected from you, subject to certain exceptions.

Right to Correct Inaccurate Personal Information. If you believe that personal information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt Out of Sales and Sharing of Personal Information. We do not sell or share Applicant personal information. For this reason, this right is not applicable.

Right to Limit Use and Disclosure of Sensitive Personal Information. We do not use or disclose sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA. For this reason, this right is not applicable.

Submitting Rights Requests

Applicants have the right to submit certain requests related to your privacy rights. We will not discriminate against you for exercising any of your privacy rights.

To submit requests to delete, correct, and/or to know personal information we have collected about you, please contact us by email at contactus@myparadigm.com.

You may designate an authorized agent to make a request on your behalf. An authorized agent may submit a request on your behalf using the webforms or toll-free number listed above.

We will respond to your request in compliance with the requirements of the CCPA or other applicable law.

Verification of Your Identity

When you exercise these rights and submit a request to us, we or our partners will verify your identity via standard authentication procedures. For example, we may ask you to log in to your account if you have one with us. If you do not have an account with us, we may ask for your email address, application number, or the date you submitted your application. We also may use a third party verification provider to verify your identity.

Automated Decision-Making

We generally do not use automated decision-making technology. If we make use of automated decision-making technology, you will be informed through a separate privacy notice.

UPDATES TO THIS APPLICANT NOTICE

This Applicant Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will notify you of any material changes to this Applicant Notice by updating the Effective Date at the top of this Applicant Notice.

HOW TO CONTACT US

If you would like to contact us regarding the disclosures or rights in this Applicant Notice, please contact us by email at contactus@myparadigm.com.