

California Privacy Notice and Policy

Fortra, LLC (“we” or “us”) understands the importance of your privacy and takes our responsibility to protect your information seriously. To that end, this privacy policy provides information regarding the categories of information we collect from our employees residing in California, how we use and share that information, and certain rights and obligations relating to that information, as required by the California Privacy Rights Act (the “CPRA”). This Notice applies to the personal information we collect from California residents that are employed or contracted by Fortra, including applicants for job openings with the company and any of its affiliated companies.

Please note that this policy is a supplement to our Privacy Policy, which can be viewed at <https://www.fortra.com/privacy-policy>.

Personal Information We Collect and How We Collect It

As defined by the CPRA, “personal information” includes any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or device. It does not include publicly available information from government records or information that has been de-identified or aggregated.

We may collect the following categories of personal information from California employees, contractors and job applicants:

Category	Examples	Retention Period
Legally protected classification characteristics	Race, color, national origin, citizenship, religion, marital status, sex, sexual orientation, age, gender, military status, genetic information, medical condition, pregnancy, physical or mental disability	Applicants: 3 years or as legally required Employees: 10 years following termination or as legally required
Personal Information categories in California’s Consumer Records statute	Name, social security number, physical characteristics, address, telephone number, driver’s license number, state identification number, education, employment, employment history, bank account numbers, credit or debit card numbers, medical information, health insurance information, signature	Applicants: 3 years or as legally required Employees: 10 years following termination or as legally required
Identifiers	Name, alias, postal address, unique personal identifiers, IP	Applicants: 3 years or as legally required

	address, other online identifier, email address, social security number, driver's license or government identification number	Employees: 10 years following termination or as legally required
Internet or similar network activity	Information relating to your interaction with our websites or applications, browsing history, search history	Applicants: 3 years or as legally required Employees: 10 years following termination or as legally required
Geolocation information	Information regarding physical location, movement and movement patterns	Applicants: 3 years or as legally required Employees: 10 years following termination or as legally required
Professional or employment-related information	Prior employment history, performance information, resume or similar information	Applicants: 3 years or as legally required Employees: 10 years following termination or as legally required

We collect this information directly from you when you choose to provide it to us by applying for a job, accepting a job offer and joining Fortra as an employee through our HRIS system and third-party vendors we use to conduct pre-employment background checks, provide employee benefits, through IT infrastructure to establish and maintain access to Fortra systems to perform your role and when you visit external Fortra websites. We also collect certain identifiers (such as IP addresses) and internet and similar network activity (such as website usage data) from you indirectly when you visit, use, and navigate across our websites. We do so by using cookies and passive tracking technologies, as described in our Cookie Policy.

Some information such as name and other basic Fortra employment information may be kept beyond the 10 year threshold as part of Fortra's record retention in the main HR information system.

How We Use Your Personal Information

We use the personal information that you provide us, or that we collect about you, for the following purposes:

- To create and maintain an internal employment or contractor record which allows you appropriate access in Fortra systems.

- To create and maintain appropriate records with our third-party vendors that require your information to provide benefits or various services to you or Fortra throughout your candidacy and employment, including through termination.
- To consider you for current or future employment opportunities and to process your employment application.
- To present our external website and its contents to you.
- To fulfill any other purpose for which you provide it, such as subscribing you to an e-mail newsletter.
- To provide you with notices about your account and status.
- To allow you to participate in interactive features on our website, if any.
- To comply with applicable laws, regulations, and legal process.
- In any other way we may describe when you provide the information.
- To keep a record of our transactions and communications.
- As otherwise necessary or useful for us to conduct our business, provided the use is permitted by law. For example, analyzing audience and use patterns from the websites; storing information about your preferences and allowing us to direct or customize specific content to you; recognizing you when you return to our websites.
- For the protection of our operations or those of any of our affiliates, or to protect our rights, privacy, safety or property, or that of our affiliates, you, or other parties.
- For any other purposes with your consent.

Disclosure of Personal Information

Fortra only shares your personal information as set forth in this Policy or our Privacy Policy. Third parties with whom we may share your information are described in our Privacy Policy. Additional third parties not listed in the external Privacy Policy may include third party vendors engaged by Fortra to provide applicant processing, background check, payroll, benefits, other employment-related services or required legal services to Fortra.

During the past 12 months, Fortra has disclosed the categories of personal information described in the table above for a business or employment purpose. This may include sharing with third party vendors that are contracted by Fortra for business or employment purposes, such as completing background checks, offering health and other benefits, 401k savings and other accounts, or to comply with various legal reporting requirements.

Fortra has not sold any categories of personal information to third parties in the past 12 months.

Please note that we may also use, disclose, or transfer your information in connection with the sale, merger, dissolution, restructuring, divestiture, or acquisition of our company or its assets. We may also disclose your personal information in response to a court order, subpoena, search warrant, law, or regulation.

Your Rights Under the CPRA

The CPRA provides California residents with the rights discussed below. For convenience, and as required by the CPRA, we explain how you can exercise those rights, to the extent they are applicable.

- 1) **Right to Request and Access Information.** You have the right to request that we disclose certain information about our collection and use of your personal information during the past 12 months. Specifically, you may request that we disclose:
 - The categories of personal information we collected about you;
 - The categories of sources for the personal information we collected about you;
 - The business and commercial purposes for collecting your personal information;
 - The categories of third parties with whom we shared your personal information;
 - The specific pieces of personal information we collected about you; and
 - If we disclosed your personal information for a business or employment purpose, the categories of personal information received by each category of third party.

- 2) **Right to Correct.** You have the right to request that we correct personal information we collected from you, subject to any exceptions or limitations under the CPRA.

- 3) **Right to Restrict Use of Sensitive Data.** You have the right to request to limit any use of sensitive personal information, which is precise geolocation, race, ethnicity, religion, genetic data, union membership, private communications, and certain sexual orientation, health, and biometric information. Fortra does not share any of this sensitive data with third party vendors that are not using the information for legally required purposes, such as HR reporting services to meet Federal Contractor obligations and so forth.

- 4) **Right Against Retaliation.** If a California employee, contractor or job applicant exercises the rights discussed above, consistent with the CPRA, we will not discriminate or retaliate against that individual.

- 5) **Data Portability.** You have the right to request that we provide copies of the specific pieces of personal information we collected about you. If a verifiable consumer request is made, and subject to any exceptions or limitations under the CPRA, we will take steps to deliver the personal information to you either by mail or electronically. If we provide the information to you electronically, it will be in a portable and readily useable format, to the extent technically feasible.

- 6) **Right to Request Deletion.** You have the right to request that we delete personal information we collected from you, subject to any exceptions or limitations under the CPRA.

To exercise the rights described above, you—or someone authorized to act on your behalf—must submit a request to us by emailing us at hr@fortra.com with the email subject “California Privacy Request.” Your request must allow us to reasonably verify that you are the individual regarding whom we collected the personal information and must describe the request with enough detail that we can understand and respond to it. You may only submit requests for access or data portability twice within

any 12-month period. As indicated above, please be aware that the CPRA provides certain limitations and exception to the foregoing rights, which may result in us denying or limiting our response to your request.

The CPRA requires us to respond to a verifiable consumer request within 45 days but permits us to extend that period by an additional 45 days, provided we notify you of the reason for the extension in writing. We will notify you that we have received your request within 10 days of its receipt. In general, we will not charge a fee to respond to a verifiable request, unless it is excessive, repetitive, or unfounded.

Revision Date	Action	Approved By
December 2022	Policy and Notice Creation	Edwin Lemus