

## CPRA NOTICE AT COLLECTION AND PRIVACY POLICY

Lighthouse Living Services, LLC ("Company Name," "us," "we," and "our") provides this Notice at Collection and Privacy Policy for job applicants and employees (the "Job Applicant and Employee Privacy Policy") who reside in the state of California. The Job Applicant and Employee Privacy Policy is provided in accordance with California Privacy Rights Act (CPRA).

### Collection of Personal Information

We may collect the personal information [and sensitive personal information] categories listed in the table[s] below. [We do not collect sensitive personal information.] The table[s] also list[s], for each category, our expected retention period, how we obtain the personal information, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

<b>Personal Information Category (per the CPRA)</b>	<b>Retention Period</b>	<b>Source</b>	<b>Sold or Shared</b>
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers.	For as long as necessary to fulfil our legitimate business purposes.	Directly from you.	We do not sell or share this information.
Categories of personal information described in Cal. Civ. Code § 1798.80(e), such as name, signature, physical characteristics or description, address, telephone number, bank account number, credit card number, debit card number, or any other financial information.	For as long as necessary to fulfil our legitimate business purposes.	Directly from you.	We do not sell or share this information.
Characteristics of protected classifications under state or federal law, such as age, citizenship, and sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions).	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Commercial information, such as records of products or services	For as long as necessary to fulfil our		We do not sell or share this information.

purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	legitimate business purposes.		
Biometric information	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Geolocation data	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Audio, electronic, visual, thermal, olfactory, or similar information,	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Internet or other electronic network activity information, such as browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.	For as long as necessary to fulfil our legitimate business purposes.	Indirectly from you. For example, from observing your actions on our Site.	We do not sell or share this information.
Inferences drawn from other personal information to create a profile about a consumer reflecting a consumer's preferences, characteristics, and trends.	For as long as necessary to fulfil our legitimate business purposes.	Indirectly from you. For example, we may combine various piece of personal information to develop inferences.	We do not sell or share this information.

<b>Sensitive Personal Information Category</b>	<b>[Retention Period]</b>	<b>Source</b>	<b>[Sold or Shared]</b>
[Government identifiers (social security, driver's	For as long as necessary to fulfil our		We do not sell or share this information.

license, state identification card, or passport number)]	legitimate business purposes.		
[Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
[Precise geolocation]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
[Racial or ethnic origin]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
[Religious or philosophical beliefs]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
[Union membership]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
[Genetic data]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
[Mail, email, or text messages contents not directed to us]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.

[Unique identifying biometric information]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
[Health, sex life, or sexual orientation information]	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.

Personal information does not include: publicly available information lawfully made available from government records, deidentified or aggregated consumer information, or information excluded from the CPRA.

**Use of Personal Information**

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

- To comply with all applicable laws and regulations.
- To recruit and evaluate job applicants and candidates for employment.
- To manage your employment relationship with us, including for:
  - Onboarding processes;
  - Timekeeping, payroll, and expense report administration;
  - Employee benefits administration;
  - Employee training and development requirements;
  - The creation, maintenance, and security of your online employee accounts;
  - Reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
  - Workers’ compensation claims management; and
  - Employee job performance, including goals and performance reviews, promotions, discipline, and termination.
- To manage and monitor employee access to company facilities, equipment, and systems.
- To conduct internal audits and workplace investigations.
- To investigate and enforce compliance with potential breaches of our policies and procedures.
- To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Lighthouse Living Services, LLC
- Maintain commercial insurance policies and coverages, including for workers’ compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking.
- Administer and maintain our operations, including for safety purposes.

- As necessary or appropriate to protect the rights, property, or safety of us, our employees, our customers, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- As described to you when collecting your personal information.

We will not collect additional categories of personal information or use the personal information we collect for material different, unrelated, or incompatible purposes without providing you with notice.

## **Your Rights**

California residents have certain rights. Please note that the below rights are not absolute, and we may be entitled to refuse requests, wholly or in part, where exceptions under applicable law apply.

### *Right to Access*

You have the right to access personal information that we may collect or retain about you. If requested, we shall provide you with a copy of your personal information which we collected as permitted by the CPRA.

You also have the right to receive your personal information in a structured and commonly used format so that it can be transferred to another entity (“data portability”).

### *Right to Know*

You have the right to request that we disclose the following about your personal information, as defined by the CPRA:

- The specific personal information we have collected;
- The categories of personal information we have collected;
- The categories of sources from which we have collected your personal information;
- The business purpose(s) for collecting or sharing your personal information;
- The categories of personal information we disclosed for business purposes; and
- The categories of third parties to whom we disclosed your personal information.

### *Right to Opt-Out/Do Not Sell My Personal Information*

You have the right to opt-out of sharing your personal information with third parties for some purposes, including sharing that may be defined as a sale under applicable laws.

You also may have a right to opt-out of the use of curtailed automated decision-making technology.

### *Do Not Share or Disclose My Sensitive Personal Information*

You have the right to limit how your sensitive personal information is disclosed or share with third parties, as defined in the CPRA.

### *Right to Deletion*

In certain circumstances, you have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (instructions and description below), we will delete, and, as applicable, direct our service providers to delete, your personal information from our records, unless an exception applies.

We may deny your request to delete your personal information if retaining the information is necessary for us or our service providers, subject to certain exemptions.

#### *Right to Correct/Right to Rectification*

In certain circumstances, you have the right to request correction of any inaccurate personal information. Upon verifying the validity of a valid consumer correction request, we will use commercially reasonable efforts to correct your personal information as directed, taking into account the nature of the personal information and the purposes of maintaining your personal information.

#### *Right to Non-Discrimination*

We will not discriminate against you for exercising any of your rights under the CPRA.

**Last Updated:** July 1, 2023