



## Notice at Collection and Privacy Policy for California Job Applicants

Last Updated: June 27, 2023

This **Notice at Collection and Privacy Policy** supplements the information contained in DCS Corporation's [Privacy Policy](#) and applies to personal information collected from applicants who reside in the state of California. DCS Corporation adopts this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 (CPRA), and any terms defined in the CCPA or CPRA have the same meanings when used in this Notice.

**DCS Corporation and its subsidiaries and affiliated companies (“DCS” or the “Company”)** take your privacy seriously. This notice advises you how we collect, use, and disclose your personal information.

**California Notice at Collection:** DCS collects the personal information identified in Section 1 below for the purposes identified in Section 3 and retains it for the period described in Section 5. We do not sell your personal information or disclose it for cross-context behavioral advertising (“sharing”). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

### **EEO Statement**

DCS is an equal employment opportunity employer (EEO) and does not consider protected characteristics when making employment decisions. To better ensure equal employment opportunity within our workforce, DCS takes active steps to recruit employees with protected characteristics and grants reasonable accommodations to employees based upon disability, religion and national origin. In compliance with Executive Order 11246, DCS maintains an Affirmative Action Program (“AAP”) to affirm our commitment to equal employment opportunity. The AAP states the steps that DCS has taken and will take to ensure the goal of EEO.

### **Assistance For The Disabled**

Alternative methods for receiving this Privacy Policy are available to individuals with a disability. Please contact [cprarequest@dcscorp.com](mailto:cprarequest@dcscorp.com) for assistance.

### **This Privacy Policy explains:**

1. The categories of personal information we collect about you
2. The categories of sources from which we collect your personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. How long we keep your personal information
6. Your rights and how to exercise them
7. Changes to this Privacy Policy

### **Scope:**

This Privacy Policy applies to the personal information of California residents in their role as job applicants to DCS. (“**Applicants**”).

“**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 a particular Applicant.

“Personal information” does not include:

- Information publicly available from government records or made publicly available by you or with your permission;
- Deidentified or aggregated information;
- Information excluded from the CPRA’s scope, such as:
  - protected health information covered by the Health Insurance Portability and Accountability Act (“HIPAA”) or the Health Information Technology for Economic and Clinical Health Act (“HITECH”) or medical information covered by the California Confidentiality of Medical Information Act (“CMIA”); or
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), or the California Financial Information Privacy Act (“FIPA”).

## 1) THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect the following categories of personal information. Not all categories may be collected about every Applicant. Some of the personal information included in a particular category may also fall within another category.

- **Identifiers**, for example: real name, nickname, telephone number, postal address, e-mail address, signature, social security number (if applicable for security clearance verification purposes), and driver’s license/state issued ID number (if applicable based on the position requirements, such as for positions that require driving Company vehicles).
- **Professional or Employment-Related Information**, for example: educational institutions attended, degrees and certifications, licenses, work experience and previous employers, security clearance level, professional memberships and affiliations, and resumes (including photographs if provided by applicant).
- **Non-public educational information**, for example: academic transcripts.
- **Commercial Information**, for example: travel expense records for an interview.
- **Internet or Other Electronic Activity Information**, for example: interactions with Company’s Internet website, job application, or job advertisement, text messages and email communications and publicly available social media activity.
- **Sensory or Surveillance Data**, for example: voicemails, audio/visual recordings of interviews for certain positions, and footage from video surveillance cameras outside certain Company offices.
- **§ 1798.80**: personal information described under Cal. Civ. Code § 1798.80 to the extent not already included in other categories in this section, such as a photograph if Applicant places photo on resume.
- **Other details**, for example, hobbies and leisure activities or membership in voluntary/charitable/public organizations, for example, as stated on the Applicant’s resume.
- **Characteristics of Protected Classifications Under California or Federal Law for Applicants**, collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations.
- **Biometric information**, for example, fingerprints for the purposes of obtaining a U.S. government security clearance as required by certain Company contracts.
- **Geolocation data**, for example, badge swipes when entering DCS facilities.

**Note on inferring characteristics:** DCS does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about the Applicant.

## 2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information from the following categories of sources. Not all categories apply to every Applicant.

- **You**, for example, in your job application, forms you fill out for us, online information requests you make, assessments you complete, surveys you may submit, and any information you provide us during the course of your application and interview process.
- **Vendors and service providers**, for example, external recruiting and staffing agencies used for some positions.
- **Third parties**, for example, job references, affiliated companies, professional employer organizations or staffing agencies.
- **Automated technologies** on the Company's electronic resources, for example, to track logins and activity on the Company's careers page on its website.
- **Surveillance/recording technologies installed by the Company**, for example, video surveillance outside certain Company offices, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law.
- **Government or administrative agencies**, for example, law enforcement or public health authorities.
- **Acquired company**, if DCS acquired your employer, DCS might collect personal information from that employer.

## 3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

We may use the personal information we collect for one or more of the following purposes:

### A. Generally Applicable Purposes

Unless stated otherwise in section 3.B, below, we may use Applicants' personal information for the following purposes:

#### **Recruiting, including:**

- For recruitment of new employees and to evaluate Applicants' qualifications or suitability for employment with DCS
- To communicate with Applicants
- To conduct pre-employment or criminal history background checks
- For identification purposes
- To demonstrate Applicants' agreement to, or acceptance of, documents presented to them, *e.g.*, acknowledgment of employment application or offer letter
- For analysis of the hiring and recruiting process
- To arrange and manage Company sponsored events
- To create a talent pool for future job openings

#### **Monitoring, Security, and Compliance, including:**

- To monitor and protect DCS facilities and information systems
- To ensure compliance with applicable laws and Company policies
- To manage DCS's Ethics Helpline
- To conduct internal investigations into complaints or concerns reported by Applicants to DCS
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise DCS's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

#### **Conducting Our Business, including:**

- For training purposes or quality assurance with respect to DCS employees conducting the interviews or otherwise assisting with the recruiting and hiring process

- For travel and to manage travel expense reimbursements

**Other Purposes:**

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning
- To manage litigation involving DCS, and other legal disputes and inquiries and to meet legal and regulatory requirements
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or the financial status of DCS or any of its subsidiaries or affiliates
- To protect the rights, property, or safety of DCS, Applicants, customers or others

**B. Purposes Specific To Certain Categories Of Personal Information**

We may use the categories of Applicants' personal information listed in this Section 3.B for the purposes stated below:

**Purposes For Using Applicant Health Information:**

- To the extent necessary to comply with DCS's legal obligations, such as to accommodate disabilities
- To protect the health and safety of DCS's employees and facilities, including actions necessary to comply with applicable National or Public Health Emergencies.
- For occupational health and safety compliance and record-keeping
- To respond to an Applicant's medical emergency

**Purposes For Using Applicants' Protected Categories Of Information:**

DCS collects information about race, age, national origin, citizenship, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity (EEO) Act, the Office of Federal Contract Compliance Programs (applicable to government contractors), and California's Fair Employment and Housing Act, and for purposes of diversity analytics. Resumes provided by Applicants may also include photographs and LGBTQ organizations/associations.

DCS also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary to comply with federal and California law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

DCS collects protected categories of personal information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

**C. Deidentified Information**

At times, DCS converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual ("Deidentified Information"). DCS maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that DCS may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual.

**4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION**

DCS generally maintains personal information related to Applicants as confidential. However, from time to time, DCS may have a legitimate business need to disclose Applicants' personal information. In that event, DCS discloses your personal information listed in Section 1, above, only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by the CPRA and other applicable laws.

## A. Disclosures for Business Purposes

DCS may disclose each of the categories of personal information listed in Section 1, above, to the third parties listed below for the following “business purposes” as that term is defined under the CPRA.

- **Service providers:** DCS may disclose to service providers any of the categories of personal information listed in Section 1, above, for the business purpose of performing services on the Company’s behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by DCS:** DCS may disclose the categories of personal information listed in Section 1, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on DCS’s behalf.
- **Affiliated companies:** DCS may disclose any of the categories of personal information listed in Section 1, above, to other companies within the DCS family of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) recruiting and hiring, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

## B. No Sales or Sharing

DCS does not sell or “share” (disclose for cross-context behavioral advertising) your personal information in connection with the application process. In particular, DCS has not sold or shared your personal information in the preceding 12 months. Furthermore, we have no actual knowledge that we sell or share the personal information of individuals of any age in connection with the application process, including the personal information of children under 16.

## C. Disclosures to Others

DCS may disclose personal information to the following additional categories of third parties although these disclosures may be for purposes in Section 3, above, other than a business or commercial purpose as defined by the CPRA:

- **Your direction:** We may disclose your personal information to third parties at your direction.
- **Current and Prospective customers:** This may include, for example, disclosing your contact information, resume, work experience, or certifications to customers and notifying our government customers of vaccination status or COVID test results when required.
- **Business partners (including joint ventures, prime contractors and subcontractors):** For example, DCS might disclose your business contact information to personnel of another company, firm or organization with which you may be working.
- **Affiliated companies:** Other companies within the DCS family of companies, for example, to evaluate an applicant for a cross-enterprise team.
- **Government or administrative agencies:** These may include, for example, the Equal Employment Opportunity Commission (EEOC) as required for reporting.
- **Required Disclosures:** We may be required to disclose personal information (a) in a court proceeding, (b) in response to a court order, subpoena, civil discovery request, other legal process such as a garnishment order, or (c) as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of DCS, our employees, or others.

## 5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

If DCS hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. DCS will retain this application information for the entire duration of your employment relationship with DCS and for as long thereafter as permitted or required by applicable law.

DCS will retain information of applicants who are not hired for a minimum of four (4) years after the record is collected. These records will be retained for our internal recordkeeping and reporting purposes in compliance with California Government Code § 12946. During that time, we may use your information to consider you for positions in addition to the position(s) for which you initially applied.

We will retain your Personal Information for as long as required for the purposes for which it was collected. How long we retain it depends on a number of factors, including the purpose for which it was obtained and/or our legal or regulatory obligations. For example, we may store your Personal Information for longer periods of time where we are required to do so to meet legal, regulatory, tax, or accounting requirements. We may also store it for longer periods of time to have an accurate record of your interactions with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation.

## 6) YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM

### A. Your California Privacy Rights

Subject to applicable law, Applicants have the following rights:

- **Right to Know:** You have the right to submit a verifiable request up to twice in a 12-month period for specific pieces of your personal information obtained from you and for information about DCS's collection, use, and disclosure of your personal information.

Please note that the CPRA's right to obtain "specific pieces" does not grant a right to the whole of any document that contains personal information, but only to discrete items of personal information. Moreover, Applicants have a right to know categories of sources of personal information and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients.

- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to DCS, provided however, requests for deletion shall not apply to personal information that DCS is required to retain by applicable law or regulation or in order to operate its business.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by DCS.

### B. How to Exercise Your Rights

DCS will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- By phone (toll-free): (877) 412-0133
- By email: [cprarequest@dcscorp.com](mailto:cprarequest@dcscorp.com)

### **C. How We Will Verify Your Request**

If you submit a request to the phone number or email address identified immediately above in section 6B, you will be asked to identify your relationship to DCS and the right(s) you would like to exercise. We will match personal information that you provide us against personal information we maintain in our files. We may also provide you a [California Privacy Act Request Form](#) to complete to facilitate your request. The more risk entailed by the request (e.g., a request for specific pieces of personal information), the more items of personal information we may request to verify you.

If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

### **D. Authorized Agents**

If an authorized agent submits a request on your behalf, the authorized agent must submit with the request another document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity.

Alternatively, you can provide a power of attorney compliant with the California Probate Code.

### **E. DCS's Non-Discrimination and Non-Retaliation Policy**

DCS will not unlawfully discriminate or retaliate against you for exercising your rights under the California Privacy Rights Act.

## **7) CHANGES TO THIS PRIVACY POLICY**

If we change this Privacy Policy, we will post the changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will post a prominent notice of such changes and the effective date of the changes before making them.

### **For More Information**

For questions or concerns about DCS's privacy policies and practices, please contact us at [cprarequest@dcscorp.com](mailto:cprarequest@dcscorp.com).