

## **Lifelong Learner Holdings**

### **CCPA Privacy Notice for California Residents**

**Effective Date:** January 1, 2023

This **Privacy Notice for California Residents** supplements the information contained in LLH's Privacy Policy and informs all visitors, users, and others who reside in the State of California ("consumers" or "you") at or before the time of collection of personal information (defined below). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 effective January 1, 2023 ("CPRA"). Any terms defined in the CCPA and CPRA have the same meaning when used in this Policy.

#### **Information We Collect and Purposes for Collection**

We collect 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 consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we collect the following categories of personal information, and have collected such personal information from consumers within the last twelve (12) months, for the purposes described below:

Category	Examples	Purposes for Collection
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> <li>• Pre-employment Background Checks</li> <li>• Payroll</li> <li>• Administration of Benefits</li> <li>• Income &amp; Social Security Tax Purposes</li> <li>• Providing Job Related Notifications</li> <li>• Compliance with Company Policies</li> </ul>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<ul style="list-style-type: none"> <li>• Pre-employment Background Checks</li> <li>• Payroll</li> <li>• Administration of Benefits</li> <li>• Income &amp; Social Security Tax Purposes</li> <li>• Providing Job Related Notifications</li> <li>• Compliance with Company Policies</li> </ul>
Protected classification characteristics under California or federal law.	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 related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<ul style="list-style-type: none"> <li>• Regulatory Examinations</li> <li>• Equal Opportunity Employment Purposes</li> <li>• Federal and State Compliance Reporting</li> </ul>

Professional or employment-related information.	Current or past job history or performance evaluations.	<ul style="list-style-type: none"> <li>• Pre-employment Background Checks</li> <li>• Application Process</li> <li>• Performance Evaluations</li> </ul>
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<ul style="list-style-type: none"> <li>• Pre-employment Background Checks</li> <li>• Talent Management Assessments</li> </ul>

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete on our website or job application portal.
- Indirectly from you. For example, from observing your actions on our website or job application portal.

**Disclosing Personal Information**

We may disclose your personal information to a contractor or service provider for a business purpose. For example, we may disclose your name or government issued identification to a service provider for employment verification, benefits administration and payroll processing purposes. Where we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the categories of personal information described above for a business purpose.

We do not sell personal information.

**Retention of Personal Information**

We retain your Personal Information in accordance with our record retention policies. Personal Information is generally retained for as long as reasonably necessary to fulfill the transactions you have requested, or for legitimate business purposes, such as complying with our legal obligations, under applicable law, including United States’ federal, state, and local laws. As retention periods vary for different types of Personal Information, based on business purpose, actual retention periods vary.

## Your Rights and Choices

The CCPA and CPRA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Right to Know and Data Portability***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we disclosed your personal information for a business purpose, a list disclosing the disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

### ***Right to Delete***

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 (the "right to delete"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).

6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

### ***Exercising Your Rights to Know or Delete***

To exercise your rights to know or delete described above, please submit a request by either:

- Calling us at 1-818-900-2713
- Submitting an online request through our [Privacy Portal](#).

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

### ***Response Timing and Format***

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is

readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Personal Information Sales Opt-Out and Opt-In Rights***

LLH does not sell your personal information.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights.

### **Changes to Our Privacy Notice**

We reserve the right to amend this notice at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. You should review this Notice periodically to keep up to date on our most current policies and practices.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which LLH collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us by submitting an online request through our Privacy Portal.