

PRIVACY POLICY

Effective Date: **December 31, 2023**

This Privacy Policy explains and governs the manner in which TKC Holdings, Inc. and its subsidiaries (collectively referred to herein as “TKC”), collects, uses, maintains, and discloses information related to your use of our services. By using our services, you are agreeing to the policies and practices described in this Privacy Policy. This Privacy Policy may change from time to time. When changes are made, we will update the “Last Modified and Effective” date at the top of this Privacy Policy and, in some cases, we may provide additional notice as described below. Your continued use of our services after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy for updates. If you do not consent to these policies and practices, please do not use the website or services.

This Policy describes:

- Personal Information and Data We Collect;
- How We Collect Your Personal Information and Data;
- How We Use Your Personal Information and Data;
- How We Share Your Personal Information and Data With Third Parties;
- How We Protect Your Information and Data;
- California Privacy Rights;
- Colorado Privacy Rights;
- Connecticut Privacy Rights;
- Utah Privacy Rights;
- Virginia Privacy Rights;
- Non-Discrimination Rights;
- Identification Verification;
- Children’s Privacy;
- Changes to the Policy;
- How to Update Your Information and Manage Communications;
- Contact for More Information; and
- The California Employee Privacy Notice

Personal Information and Data We Collect

"Personal Data," means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

"Sensitive data," means a category of personal data that includes: 1. Personal data revealing racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, or citizenship or immigration status; 2. The processing of genetic or biometric data for the purpose of uniquely identifying a natural person; 3. The personal data collected from a known child; or 4. Precise geolocation data.

"Personal Information," means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household. It does not include anonymous or aggregated data that cannot be associated with an individual or household.

"Sensitive Personal Information" means Personal information that reveals a consumer's social security, driver's license, state identification card, or passport number. A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account. A consumer's precise geolocation; a consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership. The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication. A consumer's genetic data. The processing of biometric information for the purpose of uniquely identifying a consumer. Personal information collected and analyzed concerning a consumer's health. Personal information collected and analyzed concerning a consumer's sex life or sexual orientation. Sensitive personal information that is "publicly available" shall not be considered Sensitive Personal Information or Personal Information.

We may collect, use, store, and transfer different kinds of Personal Information & Data, and Sensitive Personal Information & Data about you. The categories of information and data collected may include the following (many of these categories are only collected for individuals employed by TKC Holdings, Inc. or its subsidiaries):

- **Identifiers**, such as name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers;
- **Characteristics of protected classifications under California or federal law**, including age or date of birth, national origin, disability, citizenship, military status;
- **Biometric information**, including hair color, eye color, fingerprints, height, retina scans, facial recognition, voice, and other biometric data;
- **Internet or other electronic network activity information**, including browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement;

- **Geolocation data**, which includes any kind of data that allows for determining, with reasonable precision, your location;
- **Professional or employment-related information;**
- **Education information;**
- **Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes;**
- **Personal information that reveals your social security, driver’s license, state identification card, or passport number;**
- **Personal information collected and analyzed concerning a consumer’s health.**

How We Collect Your Personal Information and Data

We may collect Personal Information and Data from a variety of sources and methods. This includes:

- **Information You Voluntarily Provide**

You may give us your Personal Information and Data by filling in forms or by corresponding with us by mail, phone, email, or otherwise. This includes Personal Information and Data you provide when you:

- Submit a Request More Information or Contact Us form on our website
- Submit a message through our website
- Send funds or make payments through our service
- Send emails through our service
- Call, email, fax, text, chat or write to us
- Create an account
- Purchased services
- Order goods

- **Information We Collect When You Use Our Services**

Information Automatically Collected

When you visit our website, our web server automatically collects your Internet protocol (IP) address, which is a number assigned to your computer when you connect to the Internet. Our web server may also be able to identify things like the type of web browser, operating system you use, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our services from your mobile devices, we receive data from that mobile device. This may include your location data, IP address and device type. We can and will use IP addresses to identify a user when necessary to enforce compliance with the website Terms and Conditions.

Use of Cookies

Cookies are small files that we or our service provider transfer to your computer's hard drive through your web browser that enables us or our service provider's systems to recognize your browser and capture and remember certain information. We use cookies to analyze movement on the website, such as total visitors to the website and pages viewed, for fingerprinting, site security, and to make improvements to the website. Moreover, our website's partners may also use cookies in connection with the services and websites to which our website links. Most web browsers are initially set up to receive cookies. If you do not want to receive cookies, browsers usually have a "Help" or "Internet Tools" feature that will show you how to prevent your browser from accepting new cookies and how to delete cookies from your computer. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited. For more information about cookies, please visit <http://www.allaboutcookies.org>.

We use third party tools included but not limited to protection tools provided by Google and CloudFlare to assist us in better understanding our website visitors. These tools collect IP address and usage data, such as the length of time a user spends on a page, the pages a user visits, and the websites a user visits before and after visiting our website. Based on this information, these providers compile aggregated data about website traffic and interactions, which we use to offer better user experiences and tools in the future. For more information visit Google or CloudFlare's Privacy and Terms.

- **Information We Collect From Third Parties**

We may collect Personal Information and Data from other sources including our trusted partnerships with service providers. The collection, use, and disclosure of Personal Information and Data received from third parties is governed by the privacy policies listed on the website where the information was submitted by the user. Third parties may send their own cookies and pixel tags to you, and may collect information and use it in a way inconsistent with this Policy. Please carefully review these third-party privacy policies to understand how your information may be collected, used, and disclosed by these third parties.

How We Use Your Personal Information and Data

TKC uses information we collect about you or that you provide to us, including Personal Information and Data, for the following business purposes:

- To provide you with our products and services, and to operate our business.

- To communicate with you and answer specific questions related to products and services offered.
- To learn more about how visitors use the website (data analysis) and measure areas of interest for the purpose of improving the website, products, and services.
- For our internal marketing purposes, which include, but are not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you.
- Enhancing the safety and security of the website, preventing potentially fraudulent, prohibited, or illegal activities, and enforcing our Terms and Conditions.
- Resolving disputes and troubleshooting problems.
- Responding to requests by government entities, in connection with an investigation of suspected or actual unlawful activity, and other duties as required by law.
- For any other purposes disclosed at the time you provide your information or as otherwise set forth in this Policy.

TKC does not use or disclose sensitive personal information for purposes other than those specified in section 7027(m) of the California Consumer Privacy Act (“CCPA”) regulations.

How We Share Your Personal Information and Data With Third Parties

We share information related to your account and purchase(s) in the following circumstances:

- **Service Providers.** We contract with third parties to provide services that allow us to operate our business. Your Personal Information and Data may be disclosed to these third-party service providers in order for us to provide you with our services and products. Third party services include, but are not limited to, (1) supporting your use of our website, (2) providing operational, marketing or advertising support, and/or (3) other purposes to support our business, such as analyzing data. Service Providers are permitted to use your information only on our behalf as specified in the vendor contract.
- **For Security Purposes.** For some of our products, in order for our services to be effectuated we are required to disclose limited personal information that you have provided us to a correctional facility, who must review this information for security purposes. Additionally, the end-recipient of the services or products you purchase may be required to receive limited personal information, so that they may consent to the receipt of the services or products at issue.
- **Legal Process.** Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation, or legal process, such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

- **Internal Third Parties.** We may share Personal Information and Data with our parent company TKC Holdings, Inc. and other companies owned by or controlled by TKC Holdings, Inc., who may use the Personal Information and Data for the purposes described herein.
- **Business Transactions.** Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information and Data in the same way as set out in this Privacy Policy.
- **Website Security.** We use products by Google and CloudFlare to protect our website from various types of abusive processing attempts. In order for these tools to work, they analyze various information they collect from each visitor, which may include the IP address, mouse movements, length of stay, and other information. This data is sent to Google or CloudFlare to determine whether the visitor is a natural person or an abusive automated program (*e.g.*, bot). For more information visit Google or CloudFlare's Privacy and Terms.

How We Protect Your Information

We endeavor to incorporate physical, technical, and administrative safeguards and policy methods to protect your personally identifiable information. It is also important that you take steps to maintain the secrecy of your account information and secure access to your computer. Always be sure to log out of your account when using a shared or public computer. Please be aware that no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Therefore, we cannot guarantee its absolute security. It may be possible for third parties to intercept or access transmissions or private communications unlawfully. Any such transmission is done at your own risk.

California Privacy Rights

If you are a California resident, the California Consumer Privacy Act (CCPA) provides you with certain additional privacy rights related to the Personal Information TKC collects or has collected about you. Please see below to learn more about your rights under the CCPA.

- **Request to Know**

You may request no more than twice in any 12-month period and, subject to verification of your identity and certain exemptions, we will provide:

- The categories of Personal Information we collected about you.
- The categories of sources from which the Personal Information is collected.
- The categories of Personal Information sold or shared for purposes of cross-contextual advertising to a third party, as well as the categories of third parties to whom such personal information was disclosed, by category of categories of personal information for each category of third party.

- The categories of Personal Information that the business disclosed about the consumer for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- Our business or commercial purpose for collecting, selling, or sharing for purposes of cross-contextual advertising your Personal Information.
- The specific pieces of Personal Information we collected about you.

- **Request to Delete**

You may request that we delete Personal Information we have collected from you, subject to verification of your identity. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of customer contracts.

- **Request to Correct**

You may request that we correct inaccurate Personal Information we have collected from you, subject to verification of your identity and exceptions provided by law.

- **Request Not to Sell or Share Personal Information**

You have the right to opt-out from having your Personal Information and Sensitive Personal Information sold to third parties or shared to third parties for purposes of cross-contextual advertising. However, TKC does not sell Personal Information or Sensitive Information nor does TKC share Personal Information or Sensitive Personal Information with third parties for purposes of cross-contextual advertising. TKC has no actual knowledge of any sales of Personal Information or Sensitive Personal Information of minors under 16 years of age.

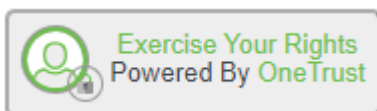
- **Request to Limit Use and Disclosure**

You may request that we limit the use and disclosure of your Sensitive Personal Information. However, TKC does not collect Sensitive Personal Information.

- **Exercising Your CCPA Rights**

If you are a California resident and would like to submit a CCPA request, you or your authorized agent may:

- Contact us by phone at 1-844-475-7190, or
- Initiate a request by completing our online form which can be located here:



Please note that these rights apply to select California consumers. Only you, or an agent you authorize to act on your behalf may make a verifiable consumer request related to your Personal Information. To authorize another person to make a verifiable request on your behalf, you must provide that person with written permission clearly describing their authority to make a request on your behalf. That agent must also be able to verify their identity with us and provide us with their authority to act on your behalf. An individual to whom you have provided Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code may also make a request on your behalf. If your request is denied, you will be provided with a method to appeal this finding.

- **Other California Privacy Rights.**

California Civil Code Section 1798.83 permits California residents who have provided personally identifiable information to us or our third-party advertisers and marketing partners, if any, to request certain information regarding our disclosure of personally identifiable information to third parties for direct marketing purposes. We do not share information we collect about you with third parties for those third parties' direct marketing purposes.

Your 'Do Not Track' Browser Setting. Some web browsers incorporate a "Do Not Track" feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including ours, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <http://allaboutdnt.com>. Other third-party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

Colorado Privacy Rights

If you are a Colorado resident, the Colorado Privacy Act (CPA) provides you with certain additional privacy rights related to the Personal Data TKC collects about you. Please see below to learn more about your rights under the CPA.

- **Request to Access**

You have the right to confirm whether or not TKC is processing your Personal Data. You also have the right to access your Personal Data processed by TKC. You may request no more than twice annually, free of charge, that we provide easy, portable access to all Personal Data held by TKC, subject to verification of your identity and exceptions provided by law.

- **Request to Correct**

You may request that we correct inaccurate Personal Data we have collected from you, subject to verification of your identity and exceptions provided by law.

- **Request to Delete**

You may request that we delete Personal Information we have collected from you, subject to verification of your identity. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of customer contracts.

- **Request Not to Process Personal Data for Targeted Advertising**

You have the right to opt-out from having your Personal Data processed for the purposes of Targeted Advertising. However, TKC does not utilize Personal Data for the purposes of Targeted Advertising.

- **Request Not to Sell Personal Data**

You have the right to opt-out from having your Personal Data sold to third parties. However, TKC does not sell Personal Data. TKC has no actual knowledge of any sales of Personal Data of children under 13 years of age.

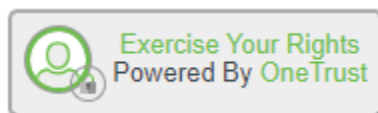
- **Request Not to Profile based on Personal Data**

You have the right to opt-out from having your Personal Data used for automated processing to evaluate, analyze, or predict personal aspects related to your identified or identifiable economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. However, TKC does not utilize Personal Data for the purposes of Profiling.

- **Exercising Your CPA Rights**

If you are a Colorado resident and would like to submit a CPA request, you may:

- Contact us by phone at 1-844-475-7190, or
- Initiate a request by completing our online form which can be located here:



Please note that these rights apply only to select Colorado consumers and currently exclude job applicants, employees, and business contacts. Only you may make a verifiable consumer request related to your Personal Data. If your request is denied, you will be provided with a method to appeal this finding.

Connecticut Privacy Rights

If you are a Connecticut resident, the Connecticut Data Privacy Act (CTDPA) provides you with certain additional privacy rights related to the Personal Data TKC collects about you. Please see below to learn more about your rights under the CTDPA.

- **Request to Access**

You have the right to confirm whether or not TKC is processing your Personal Data. You also have the right to access your Personal Data processed by TKC. You may request no more than once annually, free of charge, that we provide easy, portable access to all Personal Data held by TKC, subject to verification of your identity and exceptions provided by law.

- **Request to Correct**

You may request that we correct inaccurate Personal Data we have collected from you, subject to verification of your identity and exceptions provided by law.

- **Request to Delete**

You may request that we delete Personal Information we have collected from you, subject to verification of your identity. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of customer contracts.

- **Request Not to Process Personal Data for Targeted Advertising**

You have the right to opt-out from having your Personal Data processed for the purposes of Targeted Advertising. However, TKC does not utilize Personal Data for the purposes of Targeted Advertising, including the Personal Data of minors under 18 years of age.

- **Request Not to Sell Personal Data**

You have the right to opt-out from having your Personal Data sold to third parties. However, TKC does not sell Personal Data, including the Personal Data of minors under 18 years of age.

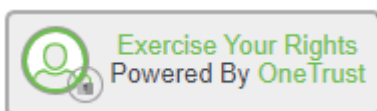
- **Request Not to Profile based on Personal Data**

You have the right to opt-out from having your Personal Data used for automated processing to evaluate, analyze, or predict personal aspects related to your identified or identifiable economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. However, TKC does not utilize Personal Data for the purposes of Profiling, including the Personal Data of minors under 18 years of age.

- **Exercising Your CTDPA Rights**

If you are a Connecticut resident and would like to submit a CTDPA request, you may:

- Contact us by phone at 1-844-475-7190, or
- Initiate a request by completing our online form which can be located here:



Please note that these rights apply only to select Connecticut consumers and currently exclude job applicants, employees, and business contacts. Only you may make a verifiable consumer request related to your Personal Data. If your request is denied, you will be provided with a method to appeal this finding.

Utah Privacy Rights

If you are a Utah resident, the Utah Consumer Privacy Act (UCPA) provides you with certain additional privacy rights related to the Personal Data TKC collects about you. Please see below to learn more about your rights under the UCPA.

- **Request to Access**

You have the right to confirm whether or not TKC is processing your Personal Data. You also have the right to access your Personal Data processed by TKC. You may request no more than twice in a twelve (12) month period, free of charge, that we provide easy, portable access to all Personal Data held by TKC, subject to verification of your identity and exceptions provided by law.

- **Request to Delete**

You may request that we delete Personal Information we have collected from you, subject to verification of your identity. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of customer contracts.

- **Request Not to Process Personal Data for Targeted Advertising**

You have the right to opt-out from having your Personal Data processed for the purposes of Targeted Advertising. However, TKC does not utilize Personal Data for the purposes of Targeted Advertising.

- **Request Not to Sell Personal Data**

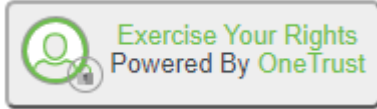
You have the right to opt-out from having your Personal Data sold to third parties. However, TKC does not sell Personal Data.

- **Exercising Your UCPA Rights**

If you are a Utah resident and would like to submit a UCPA request, you may:

- Contact us by phone at 1-844-475-7190, or

- Initiate a request by completing our online form which can be located here:



Please note that these rights apply only to select Utah consumers and currently exclude job applicants, employees, and business contacts. Only you or an agent you authorize to act on your behalf may make a verifiable consumer request related to your Personal Data.

Virginia Privacy Rights

If you are a Virginia resident, the Virginia Consumer Data Protection Act (VCDPA) provides you with certain additional privacy rights related to the Personal Data TKC collects about you. Please see below to learn more about your rights under the VCDPA.

- **Request to Access**

You have the right to confirm whether or not TKC is processing your Personal Data. You also have the right to access your Personal Data processed by TKC. You may request no more than twice annually, free of charge, that we provide easy, portable access to all Personal Data held by TKC, subject to verification of your identity and exceptions provided by law.

- **Request to Correct**

You may request that we correct inaccurate Personal Data we have collected from you, subject to verification of your identity and exceptions provided by law.

- **Request to Delete**

You may request that we delete Personal Information we have collected from you, subject to verification of your identity. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of customer contracts.

- **Request Not to Process Personal Data for Targeted Advertising**

You have the right to opt-out from having your Personal Data processed for the purposes of Targeted Advertising. However, TKC does not utilize Personal Data for the purposes of Targeted Advertising.

- **Request Not to Sell Personal Data**

You have the right to opt-out from having your Personal Data sold to third parties. However, TKC does not sell Personal Data, including the Personal Data of children under 13 years of age.

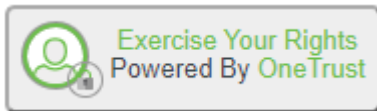
- **Request Not to Profile based on Personal Data**

You have the right to opt-out from having your Personal Data used for automated processing to evaluate, analyze, or predict personal aspects related to your identified or identifiable economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. However, TKC does not utilize Personal Data for the purposes of Profiling.

- **Exercising Your VCDPA Rights**

If you are a Virginia resident and would like to submit a VCDPA request, you may:

- Contact us by phone at 1-844-475-7190, or
- Initiate a request by completing our online form which can be located here:



Please note that these rights apply only to select Virginia consumers and currently exclude job applicants, employees, and business contacts. Only you may make a verifiable consumer request related to your Personal Data. If your request is denied, you will be provided with a method to appeal this finding.

What Are My Non-Discrimination Rights?

We will not discriminate against you for exercising any of your CCPA, CPA, CTDPA, UCPA, or VCDPA rights, which means we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

How Will You Verify My Identity If I Make a Request?

The verifiable consumer request must:

- Include your full legal name, email, and billing address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

- If you are making the request as an authorized agent you must also provide; the full legal name of the party for which you are making the request and documentation for which your authorization is based.

We will use this information to verify your identity using reasonable methods in order to process your rights request. These methods may include matching information you provided to us with information already maintained by us or through the use of a third party identify verification service. Depending on the nature of the request, we may require additional verification actions be taken, including but not limited to providing a signed declaration under penalty of perjury that you are the consumer whose Personal Information or Data is the subject of the request.

We will use the information you provide to verify your identity and to respond to your rights request and for no other purpose.

We cannot respond to your request or provide you with Personal Information or Data if we are not able to verify your identity or authority to make the request or confirm the Personal Information or Data relates to you.

You are not required to have an account with us to make a verifiable request.

Children’s Privacy

This website is not directed to, nor do we knowingly collect Personal Information and Data from, children under the age of 13. Children wishing to make purchases through our services must do so with the involvement of a parent or guardian.

Changes to the Policy

We may update the Privacy Policy as needed to reflect changes to our business and services. We will post changes to the Privacy Policy on our website, with the effective date of the revisions prominently noted next to the “Last Modified and Effective” date. We ask that you review the Privacy Policy frequently to see changes made to the policy. If we make a material change to the Privacy Policy, we will provide appropriate notice (like adding a statement to our homepage or sending you a notification through email).

How to Update Your Information and Manage Communications

If you want to modify your registration information, please login to your account and make the necessary changes. At the time of registration, you may be given a choice whether you want to receive information about new features, offers or other notices related to TKC and its services. When you register, you may opt to not receive these communications by not clicking a box that allows us to send you such information. You also have the option to opt out at a later date by following the instructions in the communication that you receive from us.

If you are not a California or Virginia resident and you wish to:

- Determine what, if any, data we have of yours;

- Receive a copy of any data we possess of yours; or
- Have any data that we have of yours erased, corrected, or amended.

We can be reached via email [at this link](#) for such requests. Your request must adequately identify you with your full legal name, email, and billing address. Your request must be described with sufficient detail that it allows us to properly understand, evaluate, and respond to it.

Contact for More Information

We welcome your questions and comments regarding our Privacy Policy. Please direct communications to TKC via email [here](#).

California Employee Privacy Notice

What is the purpose of this notice?

This California Employee Privacy Notice (the “Notice”) describes TKC’s collection of Personal Information and Sensitive Personal Information from job applicants, employees, and contractors, the business purposes for which this data will be used, and the privacy rights of California applicants, employees, contractors, beneficiaries, emergency contacts, and members of the board of directors. This Notice supplements any other privacy notices and is not intended to override them. This includes but is not limited to any provisions in the Employee Handbook.

Job Applicant: an individual seeking employment with TKC through creation of an online profile and submission of a complete job application through the TKC Career Site at <https://careers.tkcholdings.com/why-us>.

Employee: any individual hired for a wage, salary, fee, or payment paid by TKC to work under the supervision and control of TKC.

Contractor: any individual compensated for performing a specified job or service under a contract with TKC. Individuals placed by a third-party staffing agency to perform temporary work for the benefit of TKC but who are compensated by that third-party staffing agency are neither employees nor contractors for TKC; such individuals are employed by the third-party staffing agency, not TKC.

Categories of Personal Information Collected

TKC collects Personal Information and Sensitive Personal Information about you during the application process and throughout the scope of your employment with TKC.

The categories of Personal Information and Sensitive Personal Information collected may include the following:

- **Identifiers**, such as name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers;

- **Characteristics of protected classifications under California or federal law**, including age or date of birth, national origin, disability, citizenship, military status;
- **Biometric information**, including hair color, eye color, fingerprints, height, retina scans, facial recognition, voice, and other biometric data;
- **Internet or other electronic network activity information**, including browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement;
- **Geolocation data**, which includes any kind of data that allows for determining, with reasonable precision, your location;
- **Professional or employment-related information**;
- **Education information**;
- **Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes**;
- **Personal information that reveals your social security, driver's license, state identification card, or passport number**;
- **Personal information collected and analyzed concerning a consumer's health.**

TKC does not use or disclose sensitive personal information for purposes other than those specified in section 7027(m) of the CCPA regulations.

Business Purpose

TKC uses Personal Information and Sensitive Personal Information, for all purposes related to the application for employment, and the creation, administration, and termination of your employment relationship with the TKC and for all purposes related to clients. These purposes include, but are not limited to, the following:

- Making a decision about your recruitment or appointment.
- To assess your skills, qualifications, and suitability for the work or role for which you are applying.
- To carry out background and reference checks, where applicable.
- To communicate with you about the recruitment process.
- Determining the terms on which you work for us.

- Confirming you are legally entitled to work in the United States.
- To administer compensation, including, but not limited to, payment of wages and bonuses and income tax withholding and reimbursement of business expenses.
- Providing employment benefits to you if applicable, for example, medical insurance, life insurance, and retirement savings plans.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- To administer leaves of absence as required by law or company policy.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our policies.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.
- To exercise the TKC'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.
- To meet legal and regulatory requirements including civil discovery in litigation involving the TKC or affiliated companies.

- To facilitate administrative functions, including, but not limited to, the management and operation of information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning, and the maintenance of licenses, permits and authorizations applicable to the TKC's business operations.

Retention of Personal Information and Sensitive Personal Information

Personal information and Sensitive Personal Information will not be kept for longer than is necessary for the Business Purpose for which it is collected and processed and will be retained in accordance with our internal document retention policies. In certain cases, laws or regulations require us to keep records for specific periods of time, including following termination of the employment relationship. In other cases, records are retained in order to administer the employment relationship or to resolve queries or disputes which arise from time to time.

Privacy Rights

The California Consumer Privacy Act (CCPA) provides you with certain additional privacy rights related to the Personal Information and Sensitive Personal Information TKC collects about you. Please see below to learn more about your rights under the CCPA.

- **Request to Know**

You may request no more than twice in any twelve (12) month period and, subject to verification of your identity and certain exemptions, we will provide:

- The categories of Personal Information we collected about you.
- The categories of sources from which the Personal Information is collected.
- The categories of Personal Information sold or shared for purposes of cross-contextual advertising to a third party, as well as the categories of third parties to whom such personal information was disclosed, by category of categories of personal information for each category of third party.
- The categories of Personal Information that the business disclosed about the consumer for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- Our business or commercial purpose for collecting, selling, or sharing for purposes of cross-contextual advertising your Personal Information.
- The specific pieces of Personal Information we collected about you.

- **Request to Delete**

You may request that we delete Personal Information we have collected from you, subject to verification of your identity. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of contracts.

- **Request to Correct**

You may request that we correct inaccurate Personal Information and Sensitive Personal Information we have collected from you, subject to verification of your identity and exceptions provided by law.

- **Request Not to Sell or Share Personal Information and Sensitive Personal Information**

You have the right to opt-out from having your Personal Information and Sensitive Personal Information sold to third parties for purposes of cross-contextual advertising. However, TKC does not sell Personal Information or Sensitive Information nor does TKC share Personal Information or Sensitive Personal Information with third parties for purposes of cross-contextual advertising; including TKC has no actual knowledge of any sales of Personal Information or Sensitive Personal Information of minors under 16 years of age.

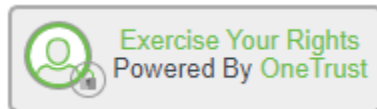
- **Request to Limit Use and Disclosure**

You may request that we limit the use and disclosure of your Sensitive Personal Information.

Exercising Your CCPA Rights

If you are a California resident and would like to submit a CCPA request, you or your authorized agent may:

- Contact us by phone at 1-844-475-7190, or
- Initiate a request by completing our online form which can be located here:



What Are My CCPA Non-Discrimination Rights?

We will not discriminate and/or retaliate against you for exercising any of your CCPA rights to receive a notice at the time of collection of your Personal Information or Sensitive Personal Information, or upon filing a private right to action following a data breach involving your Personal Information and/or Sensitive Personal Information caused by a failure of TKC to maintain reasonable safeguards.

How Will You Verify My Identity If I Make a Request?

The verifiable request must:

- Include your full legal name, email, and billing address
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

- If you are making the request as an authorized agent you must also provide; the full legal name of the party for which you are making the request and documentation for which your authorization is based.

We will use this information to verify your identity using reasonable methods in order to process your rights request. These methods may include matching information you provided to us with information already maintained by us or through the use of a third-party identity verification service. Depending on the nature of the request, we may require additional verification actions be taken, including but not limited to providing a signed declaration under penalty of perjury that you are the consumer whose Personal Information or Sensitive Personal Information is the subject of the request.

We will use the information you provide to verify your identity and to respond to your rights request and for no other purpose.

We cannot respond to your request or provide you with Personal Information or Sensitive Personal Information if we are not able to verify your identity or authority to make the request or confirm the Personal Information or Sensitive Personal Information relates to you.

You are not required to have an account with us to make a verifiable request.

Questions

If you have any questions or concerns about this Notice, please click [here to send an email](#).