

PRIVACY POLICY

Last Modified and Effective Date: **July 1, 2025**

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. If you do not consent to these policies and practices, please do not use the website, app or services.

This Policy Describes:

- Personal Information and Data We Collect
- How We Collect Your Information and Data
- Biometric Information Policy
- How We Use Your Information and Data
- How We Share Your Information and Data with Third Parties
- How We Protect Your Information and Data
- Privacy Rights
- Privacy of Minors
- Changes to the Policy
- How to Update Your Information and Manage Communications
- Contact for More Information
- California Employee Privacy Notice

Personal Information and Data We Collect

We may collect, use, store, and transfer different kinds of information that is linked or reasonably linkable to an identified or identifiable individual (collectively referred to herein as “**Information and Data**”). The categories of information and data collected may vary depending on which services you use and many of the services offered by TKC retain far less information. We have grouped together this Information and Data as follows:

1. **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.

2. **Financial Information** such as bank account and routing numbers, credit card number, debit card number, and payment details.
3. **Commercial Information** such as records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
4. **Characteristics of protected classifications under California or federal law**, including age or date of birth, national origin, citizenship.
5. **Biometric information**, including fingerprints, faceprints (i.e. your face geometry), and voice recognition. See the Biometric Information Policy below for additional details.
6. **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, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our services.
7. **Marketing and Communications Data** such as marketing campaign data, click throughs, your preferences in receiving marketing from us and our third parties, your communication preferences, email communications, and chat communications.
8. **Audio and Visual Information** such as audio or video recordings and photographs.
9. **Geolocation data**, as the approximate location information associated with your IP address.
10. **Inference Data** including inferences drawn from the Information and Data identified above.

Sensitive Personal Information. We collect personal information that may be considered Sensitive Personal Information or Sensitive Data under state privacy law, including social security number, driver's license, passport, or other government-issued ID, national origin, citizenship, and biometric information. We do not use or disclose Sensitive Personal Information or Data for any business purposes other than as permitted by law, including providing good and services, verifying your identity, processing payments, ensuring security and integrity of our websites and apps, complying with applicable legal requirements and/or as permitted by further regulations.

Retention. For each of these categories of Information and Data, we will retain the information as long as is reasonably necessary to fulfill the purpose for which it was collected, to comply with applicable laws and regulations, and/or to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.

How We Collect Your Information and Data

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

Information You Voluntarily Provide

You may give us your Information and Data by creating an account, purchasing goods and services, filling in forms or by corresponding with us by mail, phone, email, or otherwise. This includes Information and Data you provide when you:

1. Submit a "Request More Information" or "Contact Us" form on our website or app

2. Submit a message through our website or app
3. Send funds or make payments through our service
4. Send emails through our service
5. Call, email, fax, text, chat or write to us
6. Create a user profile
7. Purchase services
8. Order goods

Information We Collect When You Use Our Services

Information Automatically Collected

When you visit our website or use our apps, 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 providers transfer to your computer's hard drive through your web browser or app that enables us or our service providers' 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.

We use third party cookies provided by Google Analytics to assist us in better understanding our website visitors. These cookies 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, Google Analytics compiles aggregated data about website traffic and interactions, which we use to offer better user experiences and tools in the future. For more information on Google Analytics, visit [Google's Privacy and Terms](#). To opt out of Google Analytics please visit the [Google support page](#).

Information We Collect From Third Parties

We may receive Information and Data from other sources including our trusted partnerships with service providers. The collection, use, and disclosure of Information and Data received from third parties is not governed by TKC's Privacy Policy. We encourage you to carefully review these third-party privacy policies to understand how your information may be collected, used, and disclosed by these third parties.

Biometric Information Policy

TKC uses first-party technology and third-party technology through its vendors to collect, store, and use biometric information, such as your fingerprints, voice recognition, faceprints (i.e. your face geometry), along with other personal information like a selfie, and government-issued ID. By using our Services, you consent to TKC, our identity verification vendors, and each of our contracted service providers, collecting, storing, and using your biometric information for the purposes identified below.

Purpose for Collection of Biometric Information. TKC and its vendor may use biometric information for the following purposes:

- To verify your identity
- To prevent fraud
- To improve products and services
- To comply with legal obligations

Data Retention. Biometric information will be securely deleted no later than 3 years after your last interaction with us or our vendor, whichever happens first, provided we have no other legal obligation to retain such information for any longer period.

How We Use Your Information and Data

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

1. To provide you with our products and services, and to operate our business.
2. To communicate with you and answer specific questions related to products and services offered.
3. To verify your identity and account information in connection with our products and services you request.
4. To learn more about how visitors use the website (data analysis) and measure areas of interest for the purpose of personalizing and improving the website, products, and services.

5. 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.
6. Enhancing the safety and security of the website, preventing potentially fraudulent, prohibited, or illegal activities, and enforcing our Terms and Conditions.
7. Resolving disputes and troubleshooting problems.
8. For our own internal business purposes.
9. Responding to requests by government entities, in connection with an investigation of suspected or actual unlawful activity, and other duties as required by law.
10. For any other purposes disclosed at the time you provide your information or as otherwise set forth in this Policy.

How We Share Your Information and Data with Third Parties

We share Information and Data with third parties under the following circumstances:

Service Providers. We contract with third parties to provide services that allow us to operate our business. Your Information and Data may be disclosed to these third-party service providers in order for us to provide you with our services and products. 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 identifiers, financial information, commercial information, and characteristics of protected classifications 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 identifiers, so that they may consent to the receipt of the services or products at issue.

Internal Third Parties. We may share Information and Data across other TKC companies, who may use the Information and Data for the purposes described herein.

Website Security. We use products by Google (reCAPTCHA) 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). You can [click here](#) find more information about reCAPTCHA . All information captured by the Google reCAPTCHA tool is subject to Google's [Terms](#) and [Privacy Policy](#). You can find more information about CloudFlare in its [Privacy Policy](#).

Categories of Information and Data that have been shared with service providers and internal third parties for a business purpose in the past twelve months include identifiers, financial information, commercial information, characteristics of protected classifications under California or federal law, biometric information, internet or other electronic network activity information, marketing and communications data, audio and visual information, geolocation data, sensitive personal information, and inference data.

In certain circumstances, we may also share your personal information as follows:

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 or Court Order; (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.

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 Information and Data in the same way as set out in this Privacy Policy.

Information and Data Sold or Shared for Targeted Advertising. TKC Does not sell any personal information and has no actual knowledge of any sales or sharing of personal information of minors under 16 years of age. TKC does not share any personal information with third parties for the purposes of targeted advertising.

How We Protect Your Information and Data

We endeavor to incorporate physical, technical, and administrative safeguards and policy methods to protect your Information and Data. 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.

Privacy Rights

Depending on your jurisdiction of residence, you have certain rights with respect to your personal information. This section describes your privacy rights and explains how to exercise those rights.

Right of Access and Portability. You have the right to confirm whether or not TKC is processing your Information and Data and to access such Information and Data. This includes the right to know:

1. The categories of Information and Data we collected about you.
2. The categories of sources from which the Information and Data is collected.
3. The categories of Information and Data sold or shared for purposes of cross-contextual advertising to a third party, as well as the categories of third parties to whom such Information and Data was sold or shared.
4. The categories of Information and Data 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.

5. Our business or commercial purpose for collecting, selling, or sharing for purposes of cross-contextual advertising your Information and Data.
6. The specific pieces of Information and Data we collected about you.

You also have the right, to the extent the information is available in a digital format, to obtain a copy of your Information and Data in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance. You may also request a list of the specific third parties to which we have disclosed Information and Data.

Right to Delete. You may request that we delete Information and Data we have collected from you, under certain circumstances. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of contracts.

Right to Correct. You may request that we correct inaccurate Information and Data we have collected from you, though we may need to verify the accuracy of the new data you provide to us.

Right to Opt Out. You have the right to opt out of the processing of Information and Data for the following purposes:

Sales and Targeted Advertising. You have the right to opt-out from having your information and Data sold or processed for the purpose of targeted advertising. However, TKC does not sell or process Information and Data for the purpose of targeted advertising.

Profiling. You have the right to opt-out from having your Information and Data used profiling in connection with decisions that produce legal or similarly significant effects. However, TKC does not utilize Information and Data for the purpose of Profiling.

Right to Limit Use and Disclosure. You have the right to request that we limit the use and disclosure of Sensitive Personal Information to specific business purposes approved by law. Our use of Sensitive Personal Information is already limited to the approved business purposes identified above.

Right to Withdraw Consent: You have the right to withdraw your consent at any time where we are relying on consent to process your Information and Data. If you withdraw your consent, we may not be able to provide certain products or services to you.

Right to Non-Discrimination: Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under applicable law, including by, but not limited to:

1. Denying you goods or services;
2. Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
3. Providing you a different level of quality of goods or services; or
4. Suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

Exercising Your Rights

If you would like to submit a 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](#).

Please note that only you, or an agent you authorize to act on your behalf may make a verifiable consumer request related to your Information and Data.

Authorizing an Agent to Act on Your Behalf. Except where you have provided an agent with a Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code, when using an authorized agent 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 applicable state rules may also make a request on your behalf.

Verifying Your 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.

Making a verifiable consumer request does not require you to create an account with us. One of our representatives will contact you in order to verify your identity. You may need to provide additional information in order to verify your request. Depending on the nature of the request, we may also 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 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 Information or Data if we are not able to verify your identity or authority to make the request or confirm the Information or Data relates to you.

Appeals. Depending on applicable law, you may be able to appeal our decision to deny your request. If applicable you can file an appeal by calling 1-844-475-7190, or initiating a request by completing our [online form](#).

Exceptions. These rights are not absolute and are subject to certain exceptions. For example, we cannot disclose or permit access to specific pieces of Information and Data if granting your request would present a certain level of risk to the security of the Information and Data at issue, your account with us or the security of our services. We may deny your deletion request if retaining the information under certain

circumstances, for example, when it is necessary for us or our service providers to complete a contract or transaction with you or to comply with legal obligations.

Other California Privacy Rights. California residents have the right to receive information that identifies any third party companies or individuals that we has shared your Information and Data with in the previous calendar year, as well as a description of the categories of Information and Data disclosed to that third party. You may obtain this information once a year and free of charge by contacting us at the address below. Please be aware that not all information sharing is covered by the requirements of Section 1798.83 and only information on covered sharing will be included in our response.

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. 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.

Privacy of Minors

This website is not directed to, nor do we knowingly collect Information and Data from, minors under the age of 16. Minors wishing to make purchases through our services must do so with the involvement of a parent or guardian.

Changes to this 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. 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. When necessary we may notify you of material changes, for example via email or other method.

How to Update Your Information and Manage Communications

If you want to modify your registration information, please login to your profile 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.

Contact for More Information

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

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 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. For the purposes of this Notice, “**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.

Categories of Personal Information Collected

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

The categories of Personal Information collected may include the following:

- **Identifiers**, such as name, alias, employee/staff ID, postal address, unique personal identifier, online identifier, email address, social security number, driver’s license number, passport number, or other government issued identification card.
- **Characteristics of protected classifications under California or federal law**, including race, sex/gender, marital status, age or date of birth, national origin, disability, citizenship, military status, request for leave for family care, health condition, or pregnancy.
- **Family information**, such as the name, relationship, date of birth, contact details, and social security numbers of your family members, and any other information that may be needed for the administration of benefits and to identify who to contact in the case of an emergency.
- **Internet or other electronic network activity information**, such as information technology systems usage information related to your use of our equipment, systems, and other resources, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our systems.
- **Professional or employment-related information**, such as your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that we provide to the insurer), hours and overtime, tax code, taxes withheld, holiday entitlement, sick time, accrued salary information, and information relating to your retirement accounts, job title, category and status, work location, department, employment contract, assigned tasks and projects, weekly hours, supervisor’s name, start and end date, and reason for leaving, performance reviews, evaluations and ratings, information about disciplinary

allegations, the disciplinary process and any disciplinary warnings, details of grievances, and any outcome; professional certifications, and prior work experience;

- **Education information** such as your education and training background;
- **Post-offer criminal background information**, such as any criminal history, revealing felony, misdemeanor, sex offender, probation, and other federal, state and county criminal offense records.
- **Audio and video information**, such as pictures and security videos.
- **Financial information**, such as your bank details (for payroll and business reimbursement purposes only) and business travel and entertainment data.
- **Health information**, as required by law or as necessary to manage the employment relationship, including drug test results, smoking status, benefits administration, occupational health, disability accommodation, workers' compensation, and medical leave.
- **Termination and post-employment information**, such as termination agreements, benefits notices, and unemployment compensations forms.

Sensitive Personal Information. We collect Personal Information that is defined as “**Sensitive Personal Information**” under California law, including driver’s license, state identification card, passport, or other government issued identification card, social security numbers, race or ethnic origin, immigration status, and health information. We use and disclose Sensitive Personal Information only as necessary: (i) to process your request for employment, (ii) provide services and benefits in connection with your employment, (iii) to comply with the law, and (iv) for business purposes reasonably expected within the scope of your employment.

How We Collect Your Personal Information

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

Information You Voluntarily Provide to Us

We may collect Personal Information from you that you voluntarily provide to us as an applicant and during the scope of your employment or temporary assignment.

Information We Collect When You Use Our Systems

We collect Personal Information when you use our systems, including computer systems, security systems, time keeping systems, and any internal intranet or online platforms.

Information We Collect When You Use Our Website

Automated technologies or interactions. If you applied for a position through one of our websites, we receive and store internet protocol (IP) addresses, browser type, internet service provider (ISP),

referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our website from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address and device type. You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

Cookies. Cookies are small files that we or our service provider transfer to your computer's hard drive through your web browser or app 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.

We use third party cookies provided by Google Analytics to assist us in better understanding our website visitors. These cookies 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, Google Analytics compiles aggregated data about website traffic and interactions, which we use to offer better user experiences and tools in the future. For more information on Google Analytics, visit [Google's Privacy and Terms](#). To opt out of Google Analytics please visit the [Google support page](#).

Information We Collect From Third Parties

We collect Personal Information from service providers including where we operate accounts on third-party platforms, such as employee search and recruiting platforms, background check and employee eligibility providers, employee benefit providers, payroll providers, security providers, evaluation and training providers, support system platforms, curriculum platforms, emergency notification platform, electronic signature providers, and technology providers.

How We Use Your Personal Information

TKC uses 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.

How We Disclose Personal Information

Service Providers. We may use third-party service providers to perform certain business services on our behalf and may disclose Personal Information to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose, or retain the Personal Information to provide these services and are prohibited from selling Personal Information. Business services provided include, but are not limited to, employee search and recruiting platforms, background check and employee eligibility providers, employee benefit providers, payroll providers, security providers, evaluation and training providers, curriculum platforms, support system platforms, emergency notification platform, electronic signature providers, travel management providers, employee survey providers, and technology providers.

Internal Third Parties. We may share Personal Information with our parent company, subsidiaries and other companies owned by or controlled by Employer, who may use the Personal Information for the purposes described above. Categories of Personal Information that have been disclosed for a business purpose with service providers and internal third parties in the past twelve months include: identifiers, characteristics of protected classifications under California or federal law, family information, internet and other electronic network activity information, professional or employment related information, education information, post-offer criminal background information, audio and visual information, financial information, health information, termination and post-employment information.

In certain circumstances, we may also share your Personal Information as follows:

Business Transactions. We may do business with 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 in the same way as set out in this Policy.

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.

Information You Provide To A Third Party. We may contract with third party service providers that operate their own websites and online platforms on which you will need to create an account ("**Third-Party Sites**"). TKC does not control any Third-Party Sites and is not responsible for any information they may collect. The information collection practices of a Third-Party Site are governed by its privacy policy. It is your choice to enter any Third-Party Site. We recommend that you read its privacy policy if you choose to do so.

Personal Information Sold or Shared for Targeted Advertising. TKC Does not sell any personal information and has no actual knowledge of any sales or sharing of personal information of minors under 16 years of age. TKC does not share any personal information with third parties for the purposes of targeted advertising.

Retention of Personal Information. Personal information will be retained as long as necessary for the business purpose for which it is collected and processed and to comply with applicable laws and regulations in accordance with our internal document retention policies. We consider the following criteria when determining how long to retain Personal Information: why we collected the Personal Information, the nature of the Personal Information, the sensitivity of the Personal Information, our legal obligations related to the Personal Information, and the risks associated with retaining the Personal Information.

California Privacy Rights

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

Right 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:

- 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 sold or shared.
- 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.

You also have the right, to the extent the information is available in a digital format, to obtain a copy of your Personal Information in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance

Right 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.

Right 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.

Right to Opt Out. You have the right to opt-out from having your Personal Information sold to third parties or shared with third parties for purposes of cross-contextual advertising. However, TKC does not sell Personal Information nor does TKC share Personal Information with third parties for purposes of cross-contextual advertising.

Right to Limit Use and Disclosure. You may request that we limit the use and disclosure of your Sensitive Personal Information for any purpose other than the pre-approved business purposes identified in the privacy law. Our use of Sensitive Personal Information is already limited to the approved business purposes identified above.

Right to Non-Discrimination. The CCPA provides the right to be free from discrimination if you choose to exercise your rights under the statute, and we will not retaliate against you for the exercise of your rights.

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](#).
- Contact the Chief People Officer by phone, email or in person.

Authorizing an Agent to Act on Your Behalf. Only you or a person that you authorize to act on your behalf, may make a verifiable request related to your Personal Information. Except where you have provided an agent with a Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code, when using an authorized agent you must: (1) provide the agent with signed permission clearly describing their authority to make a request on your behalf; (ii) verify your own identity; and (iii) directly confirm that you have provided the authorized agent permission to submit the request. That agent must also be able to verify their identity with us and provide us with their authority to act on your behalf.

Verifying Your 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 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 if we are not able to verify your identity or authority to make the request or confirm the Personal Information relates to you. You are not required to have an account with us to make a verifiable request.

Exceptions. These rights are not absolute and are subject to certain exceptions. For example, we cannot disclose or permit access to specific pieces of Personal Information if granting your request would present a certain level of risk to the security of the Personal Information at issue, your account with us or the security of our Services. We may deny your deletion request if retaining the information under certain circumstances, for example, when it is necessary for us or our service providers to complete a contract or transaction with you or to comply with legal obligations.

Questions

If you have any questions or concerns about this Notice, please contact us using our [online form](#).