

CALIFORNIA PRIVACY POLICY

Last Updated: June 30, 2020

This Privacy Policy addresses the following topics

- The Scope of this Privacy Policy
- The Company's Collection, Use, and Disclosure of Personal Information
- Your California Privacy Rights
- How to Exercise Your Rights
- Additional Rights Under California Law
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- For More Information
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Surge Staffing LLC, Surge Management, LLC, Talent Staffing, LLC and/or Daily Services, LLC (collectively "Company," "we," "our," or "us") take your privacy seriously. We want you to know how we collect, use, share, and protect your Personal Information and about the rights of California Consumers under California law.

The Scope Of This Privacy Policy

What Is Personal Information?

"Personal Information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California Consumer or household.

Whose Personal Information Is Covered By This Policy?

This California Privacy Policy applies to the Personal Information of residents of the State of California in their capacity as consumers ("California Consumers").

What Personal Information Does This Privacy Policy Cover?

This Privacy Policy applies to all Personal Information of California Consumers that we collect both online and offline, including through California Consumers' (a) visits to our website, (b) calls or correspondence sent to our offices, (c) through emails, (d) visits to our office(s), (e) through chat functionality through our website or a third-party provider, (f) texts, (g) through complaint submissions utilizing our complaint-tracking webform, and (d) use of our products, applications, or services that references this Privacy Policy (collectively, the "Services").

Whose Personal Information Is Not Covered By This Privacy Policy?

For purposes of this Privacy Policy, "Consumer" does not include:

- California residents who are Company's employees, job applicants, owners, directors, officers, or contract workers (collectively, "HR Individuals"), or the emergency contacts of HR Individuals or the dependents or spouses who receive Company benefits by virtue of their relationship to an HR Individual in their capacities as HR Individuals or emergency contacts, dependents, or spouses; or
- California residents who are employees or other agents of a business engaged in a transaction with Company in their capacities as employees or agents of that business.

What Else Should I Know About the Company's Handling Of California Consumers' Personal Information?

If you have any questions, please contact us using the information below.

The Company's Collection, Use, And Disclosure Of Personal Information

This section of the Privacy Policy describes, for the 12 months preceding the date last updated, above, (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the

business and commercial purposes for use, and (d) the categories of third party recipients of your Personal Information. Unless we inform you otherwise, this section also serves as our “notice at collection” by informing you of your Personal Information to be collected in the future and the purposes for its use.

Categories of Personal Information Collected

In the last 12 months, Company collected the following categories of Personal Information about California Consumers:

- **Identifiers**, including: real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, and account name.
- **Categories described in Cal. Civ. Code § 1798.80(e)** (except those already listed in “Identifiers” above), including: phone number, medical information, photograph, signature, education history, credit card information.
- **Characteristics of protected classifications under California or federal law**, including: N/A
- **Commercial information**, including: records of services purchased, obtained, or considered or other consuming histories.
- **Internet or other electronic network activity information**, including: Google Analytics data, usernames, and credentials.
- **Geolocation data**, including: city and state and GPS data.
- **Sensory information**, including: voicemails.
- **Professional or Employment-Related Information**, including: work history, job interests, qualifications, skillsets.
- **Profile information**, including: attitudes collected from open-ended comments left by users on Company website; purchasing patterns; or other information you may provide directly to us in your communication with the Company.

Sources Of Personal Information and Purposes For Using Personal Information

In the last 12 months, Company collected the categories of Personal Information listed above from the following sources and used those categories of Personal Information for the following purposes:

Categories of Personal Information Collected in the Last 12 Months	Sources from Which Personal Information is Collected	Business Purposes and Commercial Purposes for Collecting that Personal Information
Identifiers	<ul style="list-style-type: none"> ● The California consumer himself or herself directly. ● From third-party software vendors utilized to attract talent and/or provide customer service. ● Online customer service software. ● Directly from our clients or sub-vendors ● Indirectly from clients or others in the process of providing our services. 	<ul style="list-style-type: none"> ● Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, auditing compliance with the law. ● Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity. ● Debugging to identify and repair errors that impair existing intended functionality. ● Performing general IT maintenance or administration. ● Short-term, transient use. ● Performing or improving services, including but not limited to maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services. ● Undertaking internal research for technological development and demonstration. ● Undertaking activities to verify or maintain the quality or safety of a service or device that is

		<p>owned, manufactured, manufactured for, or controlled by Company, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by Company.</p> <ul style="list-style-type: none"> • Product and service training, for example, by providing training and information on using, servicing, selling, and displaying the Company's products and services. • Communications about promotions, for example, by communicating about special events, sweepstakes, promotions, and surveys. • Monitoring services and communications for quality-control purposes. • Marketing of services and/or attracting customers, sub-vendors, service providers, or applicants. • To provide staffing and vendor management services. • To effectuate the activity or result for which the information is acquired and to respond to requests from the consumer. • Responding to requests for information, inquiries, or complaints. • To comply with the law or contractual obligations. • To recruit potential employees or perform recruiting services for a customer. • To operate our business. • To respond to a government inquiry, a lawsuit, or other legal processes. • Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback. • Processing or collecting payments.
<p>Categories described in Cal. Civ. Code § 1798.80(e)</p>	<ul style="list-style-type: none"> • The California consumer himself or herself directly. • Facebook • From third-party software vendors utilized to attract talent and/or provide customer service. • Online customer service software. • Directly from our clients or sub-vendors • Indirectly from clients or others in the process of providing our services. 	<p>The purposes listed for "Identifiers," and including:</p> <ul style="list-style-type: none"> • Marketing of services and/or attracting customers or applicants.
<p>Commercial information</p>	<ul style="list-style-type: none"> • The California consumer himself or herself directly. • Directly from our clients or sub-vendors • Indirectly from clients or others in the process of providing our services. 	<p>The purposes listed for "Identifiers," except for:</p> <ul style="list-style-type: none"> • Debugging to identify and repair errors that impair existing intended functionality.
<p>Internet or other electronic network activity information</p>	<ul style="list-style-type: none"> • From third-party software vendors utilized to attract talent and/or provide customer service. • Online customer service software. 	<p>The purposes listed for "Identifiers."</p> <p>In addition:</p> <ul style="list-style-type: none"> • To partner or recruit potential employees with/to clients and/or for employment-consideration purposes

Geolocation data	<ul style="list-style-type: none"> From third-party software vendors utilized to attract talent and/or provide customer service. Online customer service software. 	<p>The purposes listed for "Identifiers" except for:</p> <ul style="list-style-type: none"> To respond to a government inquiry, a lawsuit, or other legal process.
Sensory information	<ul style="list-style-type: none"> The California consumer himself or herself directly. 	<p>The purposes listed for "Identifiers" except</p> <ul style="list-style-type: none"> Processing or collecting payments.
Professional or employment-related information	<ul style="list-style-type: none"> The California consumer himself or herself directly. From third-party software vendors utilized to attract talent and/or provide customer service. Online customer service software. 	<p>The purposes listed for "Identifiers," except for:</p> <ul style="list-style-type: none"> Processing or collecting payments. <p>In addition:</p> <ul style="list-style-type: none"> To partner or recruit potential employees with/to clients and/or for employment-consideration purposes.
Non-public education information	<ul style="list-style-type: none"> The California consumer himself or herself directly. 	<p>The purposes listed for "Identifiers," except for:</p> <ul style="list-style-type: none"> Debugging to identify and repair errors that impair existing intended functionality. Performing general IT maintenance or administration. Monitoring services and communications for quality-control purposes. <p>In addition:</p> <ul style="list-style-type: none"> To partner or recruit potential employees with/to clients and/or for employment-consideration purposes.
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<ul style="list-style-type: none"> The California consumer himself or herself directly. From third-party software vendors utilized to attract talent and/or provide customer service. 	<p>The purposes listed for "Identifiers," except for:</p> <ul style="list-style-type: none"> Communications about promotions, for example, by communicating about special events, sweepstakes, promotions, and surveys. Debugging to identify and repair errors that impair existing intended functionality. Performing general IT maintenance or administration.

Disclosure Of Personal Information To Third Parties

In the last 12 months, Company disclosed the following categories of Personal Information about California Consumers to the following categories of third parties for a business or commercial purpose

Category of Personal Information	Categories of Third Parties
Identifiers	<ul style="list-style-type: none"> Service Providers, including providers of Data Collection Technologies, Complaint Tracking software, marketing service software or entities, providers of data analytics services, and website providers. Government agencies, law enforcement, and other parties as required by law, including in litigation
Categories described in Cal. Civ. Code § 1798.80(e)	<ul style="list-style-type: none"> Government agencies, law enforcement, and other

	parties as required by law, including in litigation
Characteristics of protected classifications under California or federal law	<ul style="list-style-type: none"> Government agencies, law enforcement, and other parties as required by law, including in litigation
Commercial Information	<ul style="list-style-type: none"> To marketing companies or software engaged to promote the Company.
Internet or Other Electronic Network Activity Information	<ul style="list-style-type: none"> Service Providers, including providers of Data Collection Technologies, providers of data analytics services, and website provider.
Geolocation Information	<ul style="list-style-type: none"> Service Providers
Professional Or Employment-Related Information	<ul style="list-style-type: none"> Service Providers, including providers of Data Collection Technologies, providers of data analytics services, and website provider Government agencies, law enforcement, and other parties as required by law, including in litigation Customers
Non-Public Education Information	<ul style="list-style-type: none"> Customers that receive or manage staffing, direct-hire, or vendor-management services.
Inferences information	<ul style="list-style-type: none"> Customers that receive or manage staffing, direct-hire, or vendor-management services.

We may also disclose the personal information above to vendors that assist with compliance with this policy and/or the California Consumer Privacy Act and/or vendors that are used in our business operations.

No Sale of Personal Information

The Company does not and will not sell California Consumers' Personal Information.

Your California Privacy Rights

Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that Company has collected about them;
- The categories of sources from which Company collected the Personal Information;
- The categories of Personal Information that Company sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for Company's collection, disclosure, or sale of the Personal Information.

Right to Delete

- California Consumers have the right to submit a verifiable request for deletion of their Personal Information that Company has collected from the Consumer. Certain information is excepted from deletion requests.

Right to Opt-Out of Sale of Personal Information

- California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, Company does not and will not sell Personal Information.

HOW TO EXERCISE YOUR RIGHTS

- Making Requests

Company will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights in the following ways:

- a) Complete the online request form available [here](#).
- b) Contact by telephone: 1-855-562-7288
- b) Requests By Authorized Agents

You can have an authorized agent submit a CCPA request to us on your behalf by (a) providing us with a written authorization signed by you that designates the agent as your authorized agent for purposes of a CCPA request; (b) verifying your identity directly with us; and (c) directly confirming with us that the agent is authorized to submit the request.

- c) How We Will Verify Your Requests

To prevent anyone other than you, or your authorized agent, from exercising the right to know or the right to delete with respect to your personal information, we follow procedures to verify your, or your agent's, identity. This process seeks to confirm that the person making a request is the person about whom we have collected personal information or that person's authorized agent. The verification process involves matching data points that you provide with your request against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. We will use the information you provide in your completed request form to verify your identity, and we may request additional information if necessary to complete the verification process.

ADDITIONAL RIGHTS UNDER CALIFORNIA LAW

- a) The Company's Non-Discrimination Policy

California Consumers have the right not to be subject to discriminatory treatment by Company for exercising their privacy rights under the California Consumer Privacy Act, and Company will not discriminate on that basis. However, Company may charge a California Consumer a different price or rate or provide a different level or quality of goods or services if the difference is reasonably related to the value provided to the California Consumer by the Consumer's Personal Information. If Company does so, it will provide Consumers with any legally required notice.

- b) Your 'Do Not Track' Browser Setting

The site does not collect personally identifiable information about your online activities over time and across third-party websites or online services. We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit, including the Site, know that you do not want the sites collecting your personally identifiable information.

Minors Under 16 Years of Age

We respect the privacy of children. Our Services are not designed to attract an audience younger than sixteen (16), and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of sixteen (16), you are not permitted to use our Services and should not send any information about yourself to us through the Services. Please contact us using the contact details below if you believe we may have collected information from your child under the age of sixteen (16), and we will work to delete it.

For questions or concerns about Company's privacy policies and practices, please contact us at legal@surgestaffing.com