

California Employee Privacy Notice

Introduction

This California Employee Privacy Notice (the "California Employee Privacy Notice") supplements the Lumin Digital Privacy Policy and applies to the personal information of Lumin Digital California-based employees, interns, contractors, volunteers and applicants for those roles, collected by Lumin Digital, LLC. ("Lumin Digital" or the "Company"). This California Employee Privacy Notice also applies to information provided to us about employees' relatives or others that is used for emergency contact or benefits administration purposes.

Please read this California Employee Privacy Notice to learn how we collect and process your personal information when you are employed by Lumin Digital, engaged to provide services to Lumin Digital or apply for a job with Lumin Digital. Under the California Consumer Privacy Act of 2018, Cal. Civ. Code § 1798.100 et seq. and its implementing regulations (the "CCPA"), as modified by the California Privacy Rights Act (the "CPRA"), you have the right to know and understand the categories of personal information we collect about you, and the purposes for which we use such personal information. Certain terms used in this California Privacy Notice have the meaning given to them in the CCPA or CPRA and their implementing regulations. This California Employee Privacy Notice only applies to employees, contractors and job applicants who are residents of the State of California. The Company does not sell or otherwise disclose this personal information for monetary or other consideration to any third parties.

Categories of Personal Information

Category	Examples	Collected by Lumin Digital
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
Personal Information Categories Listed in the CA. Customer Records Statute (Ca. Civ. Code 1798.80)	A real name, contact information, and payment information.	Yes
Protected Classification Characteristics under CA & Fed. Law	Age, gender, national origin, marital status, citizenship.	Yes
Commercial Information	Transactional or purchase history.	No



Biometric Information	Face imagery, fingerprints, iris/retina scans, etc.	No
Internet/Network Activity Information	Browsing history and interaction with the Lumin Digital website, application or advertisement	Yes
Geolocational Data	Device location, or approximate location derived from an IP address	Yes
Sensory Data	Audio, electronic, and visual information	No
Professional or Employment-related Data	Work History and Employer	Yes
Inferences Drawn from Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes
Non-public Education Information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g; 34 CFR Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes

Personal information does not include:

- Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's or CPRA's scope, such as:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver's Privacy Protection Act of 1994

Sources of Personal Information

We collect personal information you voluntarily provide to us during the application process or when you otherwise contact us. We may also automatically collect certain information, such as IP addresses and device identifiers.

We may combine personal information you voluntarily provide to us with information we collect from other sources, such as:

- Recruiters;
- Prior employers and professional references;
- Educational institutions;
- Pre-employment screening and background check services;
- Credentialing and licensing organizations;
- Publicly available sources, such as public social media profiles on LinkedIn, Twitter or Facebook; and
- Other sources as directed by you.

Business Purposes for Collecting Personal Information

We use the categories of personal information above for the following business purposes:

- **Recruitment of Employees and Processing and Managing Job Applications:** We use your personal information to process your job application, create an applicant profile, evaluate your qualifications, schedule and conduct interviews and communicate with you.
- **Conducting Pre-Employment Screening and Background Checks:** In accordance with applicable law, we use your personal information to conduct employment screening and background checks.
- **Compensation and Expense Management:** We use your personal information to conduct payroll processing, salary administration, expense reimbursement, manage the Company's corporate credit card program and other compensation purposes such as determining bonuses, equity and other forms of employee compensation.
- **Benefits Administration:** We use your personal information we collect to administer benefits we provide, such as medical, dental, vision, disability insurance, retirement benefits and other employee benefit programs.
- **General Human Resources Management:** We use your personal information we collect to provide general HR management services, including managing employee on-boarding, termination and separation, travel administration and return-to-work screening (including any medical screening as required or permitted by applicable law).

- **Training and Professional Development:** We use your personal information to provide employment-related training, assisting with professional licensing and development.
- **Internal Employment Purposes:** We use your personal information to conduct internal investigations, conduct surveys, resolve disputes, prevent or detect fraud or security incidents, conduct employee performance reviews, enforce our policies and code of conduct, protect the rights and safety of employees or others and manage whistleblower programs.
- **Compliance with Legal Requirements and Enforcement of Our Legal Rights:** We use your personal information to comply with applicable laws, regulations and legal processes (such as responding to subpoenas or court orders), and to respond to legal claims, resolve disputes, enforce our legal rights contained in employment or other contracts and comply with legal or regulatory recordkeeping requirements.

Disclosure of Personal Information

We may share your personal information for the business purposes described in this California Employee Privacy Notice with the following parties:

- **Affiliates and Subsidiaries:** We may share your personal information with our affiliates and subsidiaries.
- **Service Providers:** We may share your personal information with service providers, such as recruiters, pre-employment screening services, third-party benefits administrators, payroll processors, background check providers and others.
- **Governmental Authorities:** As required by law or legal process, we may share your personal information with federal or state regulatory agencies, law enforcement, courts and other governmental authorities.
- **Professional Advisors:** We may share your personal information with our professional advisors, such as auditors and law firms.
- **Parties Involved with Business Transfers:** We may share your personal information to third parties in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).
- In accordance with our policies and procedures, we will not discriminate or retaliate against you if you choose to exercise any of your rights under the CCPA or CPRA.

Rights of Lumin Digital Employees

The California Privacy Rights Act provides California employees with specific rights regarding their personal information. This section explains these specific rights under the California Privacy Rights Act and explains how to exercise these rights to consumers.

- **Right to Access Specific Personal Information Collected, within the last 12 months**

- Right to Delete Specific Personal Information Collected
- Right to Prohibition of Discrimination for Exercising Rights granted by the California Privacy Rights Act; i.e., a Right Against Retaliation;
- Right to Correct Inaccurate Personal Information;
- Right to Limit Use and Disclosure of Sensitive Personal Information
- Right to Opt-out of Automated Decision Making Technology

To make a request for the disclosures or deletion described above, please contact Lumin Digital Human Resources at the email address listed below in the subsequent section entitled Contact Information. Lumin Digital will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. Lumin Digital may need to request additional Personal Information from you, such as email address, residential address, mailing address, date of birth, and or mobile phone number in order to verify your identity and protect against fraudulent requests. Please note: due to business purposes and justifications, Lumin Digital may be unable to fully vindicate some aspects of rights asserted herein.

Contact Information

We reserve the right to update this privacy policy at any time, for any reason. When we make updates to this policy, we will provide an updated California Employee Privacy Notice, with at least 30 days of advanced notice before any changes take effect, unless immediate action is required to protect the security and confidentiality of sensitive information.

If you have questions, concerns, or comments regarding our privacy policy or wish to report any issues with our adherence to it, or exercise any rights granted to you by the California Consumer Privacy Act, please contact Lumin Digital Human Resources via email at human-resources@lumindigital.com.