

Processing of Personal Information of job applicants residing in California

We respect the privacy of job applicants and ensure that the Personal Information you provide us with is treated confidentially and in accordance with the requirements set by data protection regulations to the extent applicable, specifically the California Privacy Rights Act ("CPRA"). This privacy statement describes how Cyclomedia secures personal information you provide us with during the recruiting process or receive from third parties (recruitment agencies). The statement is applicable to job applicants who are residents of California. The CPRA defines Personal Information as categories of information that identifies, relates to, describes or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household. Cyclomedia does not sell or otherwise disclose this Personal Information for monetary or other consideration to any third parties. We collect Personal Information you voluntarily provide to us when you apply for a job or otherwise contact us in the recruitment context. If you are visiting our website or online job application, we may also automatically collect device information such as IP addresses and device identifiers.

Purpose and categories of data processing

Cyclomedia may process the following categories of Personal Information in relation to your job application:

- Identifiers, such as your name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, Social Security number, date of birth, and other similar identifiers.
- Personal Information, such as your signature, telephone number, education, employment or employment history.
- Characteristics of protected classifications under California or federal law, such as sex, age, race minority, veteran and disability status, through voluntary self-disclosure. Such information will only be collected as permitted by applicable law and will not be used to make hiring decisions.
- Internet or other similar network activity information, such as your IP address, log-in information or information regarding your interaction with a website or application.
- Geolocation Data, such as IP addresses from which we can determine your general location.
- Audio, electronic, visual, and similar information, for example if you use video interviewing as part of the application process.
- Professional or employment-related information, such as your work history, references, information about skills and abilities, accomplishments and awards, training and development information, performance evaluation information, and employment termination information.
- Education information, such as your education history, education records (such as grades, transcripts and class lists), and other information included in your resume or cover letter.
- Other: Job interview notes, responses to screening questions, assessment results, and any other information you provide in connection with the recruitment process. We also collect legal and contractual information, such as information necessary to respond to law enforcement and governmental agency requests, comply with legal and

contractual obligations, exercise legal and contractual rights, and initiate or respond to, or establish, exercise and defend, legal and contractual rights claims.

We may also combine Personal Information collected from other sources with the Personal Information that you provide to us. For example, we may collect information from:

- Recruiters
- Prior employers (e.g., for references)
- Professional references you provide to us
- Educational institutions
- Pre-employment screening services
- Publicly available sources such as your social media profile (e.g., LinkedIn)
- Other sources as directed by you

We use the categories of Personal Information listed above for the following purposes:

- Process and manage your application: We use your Personal Information to process your job application, establish a job applicant profile for the recruitment process, assess your qualifications for a specific role with us, schedule and conduct interviews, communicate with you, and carry out background and reference checks (see the following bullet point for additional information).
- Conduct reference and background checks (as permitted by applicable law): We use Personal Information we collect to conduct reference checks and to evaluate your qualifications and experience. We may also conduct background checks (as authorized by you and permitted by applicable law).
- Provide immigration support: If applicable and as permitted by applicable law, we may collect your Personal Information to assist with immigration support, such as applying for visas or work permits.
- Analyze and improve our recruitment process and tools: For example, we analyze trends in our applicant pool, and use Personal Information to understand and improve our recruitment process and tools (including improving diversity and inclusion).
- Record-keeping: We keep records of your Personal Information as required by law and in accordance with our record retention policies.
- Meeting legal requirements and enforcing legal terms: We collect and process your Personal Information for purposes of fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities; protecting the rights, property or safety of you, us or another party; enforcing any agreements with you; responding to claims; and resolving disputes. Additionally, we may use information about protected characteristics to analyze and monitor the diversity of our job applicants in accordance with applicable laws.

During the recruitment process, we generally do not collect or process any Sensitive Personal Information as defined in the CPRA. However, there are circumstances in which we are required or permitted by local law to process Sensitive Personal Information provided, however, any processing of your sensitive Personal Information in connection with your job application is based on your explicit consent. For example, Cyclomedia may be required to collect information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws or for government

reporting obligations. You may also provide, on a voluntary basis, other Sensitive Personal Information during the recruiting process. Please note that you can always withdraw your consent, although this may affect our ability to consider you for employment at ImPLY.

Cyclomedia may transfer your Personal Information to third parties for specific purposes:

- Cyclomedia affiliates in connection with your application process;
- Service providers and professional advisors in connection with facilitating our recruitment process, such as background and reference check screening services, and hiring process management tools;
- Service providers that provide IT services to Cyclomedia who process such data only for the purpose of such services (e.g., hosting or IT maintenance and support services);
- Government authorities and law enforcement in case of lawful requests by public authorities, including to meet national security or law enforcement requirements;
- Third parties if we undergo a merger, acquisition or other transaction in which that third party assumes control of our business (in whole or in part);
- Third parties in conjunction with any legal requirements or enforcement of legal terms.

Storage and security

Unless stated otherwise at the time of the collection, Cyclomedia deletes Personal Information if it is no longer necessary (i) for the purposes for which it was collected or otherwise processed or (ii) to comply with legal obligations (such as retention obligations under tax and accounting laws). As long as these data are stored by us, we make sure that these data are only accessible to those who need these data in executing the purposes of the data processing. Furthermore, we have multiple measures in place to prevent access to the data by unauthorized persons.

Your rights

You can request access, correction, deletion, limitation of processing, or data portability. In addition, you can raise objections to the use of your Personal Information. You can do this in writing: by e-mail to info-us@cyclomedia.com, through the contact page on our website, or by post to the following address:

Cyclomedia Technology Inc.
8215 Greenway Blvd, Suite 300
Middleton, WI 53562

If you request access, we may ask you to prove your identity, in order to prevent abuse. Should the Personal Information processed by us contain errors, you can request us to change or remove these data. We will not discriminate against you for exercising any of your rights.

You have the right to lodge a complaint with the applicable enforcement authority in relation to the execution of your privacy rights with us.