

WE ARE SOCIAL LTD.
PRIVACY NOTICE FOR CALIFORNIA EMPLOYEES AND JOB APPLICANTS
Updated 7/10/23

We Are Social Ltd. (referred to here as “we,” “our,” or “We Are Social”) is committed to protecting your privacy. The information that you provide to We Are Social is utilized in order for us to (among other things) retain you as an employee and to maintain employment records.

This Notice to California Employees and Job Applicants (“Notice”) applies to our offline and online data collection practices, including when you submit personal information for purposes of applying for and/or becoming a valued employee at We Are Social, and in the course of your employment with We Are Social, pursuant to California law, including the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”). If you are not an employee or job applicant who is a California resident, this Notice does not apply to you.

Please note that if you are visiting our website in a non-employment context, any of your personal information collected in that capacity is subject to We Are Social’s Privacy Policy for consumers and applicable consumer rights. For more information, we encourage you to visit and review our [Privacy Policy](#) and [California Consumer Notice](#).

Your Consent

Please review this Notice periodically. You should read this entire Notice before submitting information, including personal information, to us in any form. Whenever you submit personal information to us, you consent to the collection, use, disclosure, transfer, and storage of that information in accordance with this Notice.

All personal information may be used for the purposes stated in this Notice. We may make full use of all information that is de-identified, aggregated, or otherwise not in personally identifiable form.

COLLECTION OF PERSONAL INFORMATION

Personal Information

We collect personal information from you when you choose to voluntarily provide it for purposes of employment with We Are Social or applying for employment with We Are Social. We collect Personal Information, such as your email address, name, address, or telephone number based on your onboarding for employment purposes, as well as Personal Information such as your social security number, bank information, information about your family members, information about your dependents for benefits, and emergency contact information.

If you are an employee, we collect information about you through your browser, computer hardware and software. This information can include your IP address, device ID, browser type, domain names, access times and dates, number of clicks, pages viewed, one or more cookies that may uniquely identify your browser, and referring website addresses.

HOW WE USE YOUR EMPLOYEE PERSONAL INFORMATION

We use Personal Information of employees and job applicants for a wide range of purposes, including:

- to evaluate job candidacy and communicate with you regarding your application;
- to ensure compliance with internal HR policies;
- to facilitate the employment relationship, including for processing of payroll and benefits (including family health benefits), and other internal business needs;
- to maintain internal financial records including paystubs and payment methods;
- to maintain internal employment records;
- to meet and monitor government reporting regulations;
- to comply with legal obligations or to assert or defend legal rights or address legal claims and proceedings; and,
- to maintain any other business operations.

HOW WE DISCLOSE YOUR EMPLOYEE PERSONAL INFORMATION

Service Providers and Contractors

We disclose Personal Information you provide to consultants, service providers, and contractors that we use to support our business and operations who have agreed to keep the information confidential and use it only to provide the applicable service(s) such as vendors that provide payroll and benefits, vendors that help us communicate with you, vendors that host our website and data, security and fraud detection vendors.

Legal Obligations

We may disclose Personal Information to outside parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our (or others') rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations.

Sale or Corporate Restructuring

We may disclose Personal Information to third-parties in connection the sale, assignment, merger, reorganization or other transfer of our brand or company.

To see a complete list of what we collect and how we use and disclose that information, please see our [Annex 1](#).

RIGHTS UNDER THE CCPA AND CPRA

Under California law, as an employee or job applicant, you are afforded several rights, as discussed further below, about the personal information collected about you. However, there are several exceptions that may apply. These exceptions to the right to request to access, correct, amend, and/or delete your personal information may include our right to maintain personal information of employees for business purposes and solely internal uses reasonably aligned with the expectations of the employee, as well as to comply with any legal obligations, including maintaining proper employee records, or maintaining privilege or confidentiality of certain records, in compliance with applicable U.S. and California labor laws and legal rights.

RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED OR DISCLOSED

Personal Information Collected

We have collected the categories of personal information about California employees and job applicants as described in Annex 1 to this Notice. To review these categories click [here](#).

Information Sold or Shared

We have not sold or shared personal information about California employees or job applicants in the past 12 months.

We have disclosed the following categories of personal information about California employees and job applicants for a business or commercial purpose in the past 12 months:

- Personal identifiers;
- Biometric information;
- Sensitive personal information; and
- Internet/network/technology activity.

Requests to Know

You have the right to request that we disclose personal information we collect about you.

To make a request for any of the information set forth above (a “Request to Know”), please submit a verifiable employee request pursuant to the instructions below. You may only make a Request to Know twice within a 12-month period. We will acknowledge your Request to Know within 10 days and will attempt to respond substantively within 45-90 days.

The Request to Know must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request.

You can make a Request to Know the personal information we have about you with Human Resources at +1 646 661 2128 or us.hr@wearesocial.net.

Once we receive your Request to Know, we will begin the process to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of

matching identifying information provided by you with the information we have about you in our records.

RIGHT TO KNOW SENSITIVE PERSONAL INFORMATION COLLECTED

We collect and use your Sensitive Personal Information as described in [Annex 1](#).

We do not process sensitive personal information for purposes of inferring characteristics or for any purposes other than those set forth in Regulations Section 7027(m).

RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION

You have the right to request the deletion of your personal information collected or maintained by us (“Request to Delete”), subject to certain exceptions permitted by law.

To make a Request to Delete, please submit a verifiable employee request pursuant to the instructions below. We will acknowledge your Request to Delete within 10 days and will attempt to respond substantively within 45-90 days.

The Request to Delete must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request. Additionally, as permitted by law, if the information requested to be deleted is necessary for us to maintain, we will not be able to comply with your request. We will notify you if this is the case.

You can make a Request to Delete with Human Resources at +1 646 661 2128 or us.hr@wearesocial.net.

Once we receive your initial request to delete and your separate confirmation to delete, we will need to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records.

We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt-Out for 24 months as required by law.

RIGHT TO CORRECT

You have the right to request that we rectify inaccurate information about you.

Requests to Correct

To make a Request to Correct, please submit a verifiable employee request pursuant to the instructions below. We will acknowledge your Request to Correct within 10 business days and we will attempt to respond substantively within 45-90 days.

You can make a Request to Correct with Human Resources at +1 646 661 2128 or us.hr@wearesocial.net.

Once we receive your request to correct, we will need to verify that you are the person that is the subject of the request through the Verification Process.

We will review all information provided by you to us, to determine whether the information is inaccurate. We reserve the right to delete the information instead of correcting if such deletion does not impact you or you consent to the deletion.

We will inform you of our decision to deny or grant your request. I

We will retain correspondence, documents and information related to any Request to Correct for 24 months as required by law.

RIGHT TO NON-DISCRIMINATION FOR EXERCISING CONSUMER PRIVACY RIGHTS

You have the right not to receive discriminatory treatment for exercising your privacy rights conferred by the California Consumer Privacy Act, including by exercising the rights specified herein.

RETENTION OF PERSONAL INFORMATION

We will retain your Personal Information for as long as it is necessary for the purposes set out in [Annex 1](#) and to the extent necessary to comply with our legal obligations (for example, if we are required to retain your Personal Information to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

AUTHORIZED AGENT INFORMATION

You may designate an authorized agent to make a request on your behalf under the California Consumer Privacy Act.

In order to allow an authorized agent to make a request on your behalf, please email Human Resources at +1 646 661 2128 or us.hr@wearesocial.net.

When your authorized agent makes a request related to your personal information, we will require the agent to provide the above written permission. We may also require that you verify your own identity directly with us at the time such a request is made.

CHANGES TO THIS EMPLOYEE NOTICE

This Employee Notice may be revised from time to time for any reason. If this Employee Notice changes, the revised Notice will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Notice whenever you submit personal information to us.

GOVERNING LAW

This Notice along with our privacy practices will be subject exclusively to the laws of the State of California, United States of America. We make no representation that this Notice and its practices comply with the laws of other jurisdictions.

CONTACT FOR MORE INFORMATION

For information and questions about the use of your personal information or this Employee Notice or your rights under California law, you may contact Human Resources at +1 646 661 2128 or us.hr@wearesocial.net.

ANNEX 1
Notice of Collection, Use, and Disclosure

[See Privacy Policy here](#)

Category	Examples	Collected From	Purposes	Disclosed to	Sold or Shared	Retention Period
Personal Identifiers	Name, signature, mailing address, telephone number, email address, date of birth, and financial information including bank account and routing number.	<p>You when apply for an employee position and/or when you join our company as an employee.</p> <p>We may also collect information from other party sources, such as service providers, background checks, publicly available data, and other companies and referrals.</p>	<p>Required for HR and Legal purposes to maintain internal business employment records; administration of compensation and benefits; evaluate candidates for employment, and perform background checks.</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, and enforcing our legal agreements and policies.</p>	<p>Consultants, service providers, and contractors that we use to support our business and operations (e.g. processing payroll and benefits to employees) who have agreed to keep the information confidential and use it only to provide the applicable services;</p> <p>Other parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests;</p> <p>An acquirer or successor-in-interest in the event of a reorganization, merger, sale, change of control, consolidation, joint</p>	No	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

				venture, assignment, transfer or other disposition of all or any part of We Are Social or its affiliates including any negotiation thereof.		
Biometric Information	Fingerprints, photographs, video, and face.	You when you join our company as an employee.	<p>To maintain internal business employment records;</p> <p>To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your time keeping account; and</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, and enforcing our legal agreements and policies.</p>	<p>Consultants, service providers, and contractors that we use to support our business and operations (e.g. time keeping service provider) who have agreed to keep the information confidential and use it only to provide the applicable services;</p> <p>Other parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests.</p>	No	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.
Sensitive Personal Information	Personal identification numbers, including social security, driver's license,	<p>You when apply for an employee position and/or when you join our company as an employee.</p> <p>We may also collect information from other</p>	Required for HR and Legal purposes to maintain internal business employment records; administration of compensation and benefits; evaluate candidates for	Consultants, service providers, and contractors that we use to support our business and operations (e.g. processing payments and benefits to employees) who have	No	We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our

	<p>passport, or state ID card numbers; account or debit or credit card numbers; precise geolocation; race or ethnic origin, or union membership; gender identification; sexual orientation; disability status; veteran or military status; citizenship status; and mental or physical health diagnosis.</p>	<p>party sources, such as service providers, publicly available data, and other companies and referrals.</p>	<p>employment, and perform background checks.</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.</p>	<p>agreed to keep the information confidential and use it only to provide the applicable services;</p> <p>Other parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests;</p> <p>An acquirer or successor-in-interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment, transfer or other disposition of all or any part of We Are Social or its affiliates including any negotiation thereof.</p>		<p>legal obligations, resolve disputes, and enforce our legal agreements and policies.</p>
<p>Internet/ Network/ Technology Activity</p>	<p>IP addresses; audio and video monitoring, device information, webpages visited, time</p>	<p>Work-provided computer and cell phone, video monitoring, recorded meetings.</p>	<p>To maintain internal business employment records;</p> <p>To comply with our policies, procedures, and legal obligations, including complying</p>	<p>Consultants, service providers, and contractors that we use to support our business and operations (e.g. processing payments and benefits to employees) who have</p>	<p>No</p>	<p>We will retain your Personal Information for as long as it is necessary and to the extent necessary to comply with our</p>

	<p>spent on webpages, links clicked, and location information.</p>		<p>with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.</p>	<p>agreed to keep the information confidential and use it only to provide the applicable services;</p> <p>Other parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests;</p> <p>An acquirer or successor-in-interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment, transfer or other disposition of all or any part of We Are Social or its affiliates including any negotiation thereof.</p>		<p>legal obligations, resolve disputes, and enforce our legal agreements and policies.</p>
--	--	--	---	--	--	--