

## CPRA PRIVACY POLICY FOR WORK-RELATED INDIVIDUALS

### 1. PURPOSE AND INTENT

HCMC Legal, Inc. and its operating groups, parent(s), subsidiaries and affiliates (collectively, “the Company”) are committed to protecting the privacy and security of the personal information of our job applicants, employees and their emergency contacts and beneficiaries, independent contractors, board of directors, medical personnel, and corporate officers who are residents of California (“Work-Related Individuals”). This privacy policy describes how we collect, use, retain, secure and disclose personal information about you (our “Information Practices”). The Company is responsible for deciding how it collects, uses, retains, secures, and discloses your personal information.

This privacy policy is intended to comply with the California Consumer Privacy Act (“CCPA”), California Privacy Rights Act (“CPRA”), applicable regulations, and other applicable data privacy laws. This Privacy Policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

It is important that you understand this privacy policy, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. If you have any questions about this privacy policy or how we handle your personal information, please contact us at: [cpra@hirecounsel.com](mailto:cpra@hirecounsel.com).

If you wish to access this privacy policy in an alternate format or require an accommodation to access this privacy policy, please contact us at: [cpra@hirecounsel.com](mailto:cpra@hirecounsel.com).

### 2. DATA PROTECTION PRINCIPLES

We collect, use, retain, and share your personal information in accordance with certain data privacy and data protection principles. Specifically, the personal information we collect about you is: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) reasonably necessary and proportionate to achieve these purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for these purposes; and (vi) kept securely. If we intend to collect, use, retain, or share your personal information for any purpose that is incompatible with the purposes for which your personal information was collected, we will obtain your consent to do so.

For the purposes of this privacy policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. “Sensitive personal information” is a subcategory of personal information and means personal information that reveals: (a) an individual’s social security, driver’s license, state identification card, or passport number; (b) an individual’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) an individual’s precise geolocation; (d) an individual’s racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of an individual’s mail, email, and text messages unless the Company is the intended recipient of the communication; (f) an individual’s genetic data; (g) an individual’s biometric information used to uniquely identify the individual; (h) personal information collected and analyzed regarding an individual’s health; and (i) personal information collected and analyzed regarding an individual’s sex life or sexual orientation.

### 3. PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT, USE IT, AND SHARE IT

We collect, receive, use and share personal information for the following work-related individuals.  
**We do not:**

- **sell your personal information;**

- share or disclose your personal information to third parties other than the entities or service providers listed below;
- share or disclose your sensitive information to third parties for purposes other than those listed below or otherwise permitted by the CPRA;
- sell or share the personal information of consumers under 16 years of age; or
- permit third parties to collect your personal information on our behalf other than our service providers listed below.

A. Job Applicants

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	SOURCES OF THE PERSONAL INFORMATION	PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION
<u>Identifiers</u> such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers.	You, recruitment service providers, and publicly available sites and sources	Hire the best-qualified applicants, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights	Company personnel involved with hiring, applicable staffing clients, data hosting company associated with our candidate tracking tool, recruitment service providers, background check service providers, former employers, references you provide, applicable law enforcement and government agencies, former employers, healthcare professionals, and drug testing laboratory personnel
<u>Protected categories</u> such as race, color, national origin, religion, sex, disability, age, citizenship status, sexual orientation, gender identity and gender expression, medical condition, military or veteran status.	You and our recruitment service providers	Hire the best-qualified applicants; comply with our legal and contractual requirements; administer our diversity, equality and inclusion initiatives; voluntary disclosure forms and to establish, exercise our legal and contractual rights	Company personnel involved with hiring, our recruitment service providers, and applicable government agencies.
<u>Sensitive Personal Information</u> , such as social security number; driver's license number; state identification card	You and our recruitment service providers	Hire the best-qualified applicants; verify your identity; comply with our legal and contractual	Company personnel involved with hiring, recruitment service providers, third party background check

number; passport number; racial or ethnic origin; contents of an individual's mail, email, and text messages unless the Company is the intended recipient of the communication; contents of an individual's mail, email, and text messages unless the Company is the intended recipient of the communication; an individual's fingerprints; personal information collected and analyzed regarding an individual's health.		requirements; administer our diversity, equality and inclusion initiatives; and to establish, exercise our legal and contractual rights. We do not collect or process sensitive personal information for purposes of inferring characteristics about you.	provider and applicable government agencies
<u>Biometric Information</u> , such as fingerprints,	You	comply with our legal and contractual requirements	Third party background check provider.
<u>Internet or other electronic network activity information</u> , information regarding your interaction or presence with or on an internet website or social media site	You, our electronic communications equipment, Company human resources and background check team, management	Hire the best-qualified applicants, protect Company and customer information and Company equipment and systems, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights	Company personnel involved with recruiting and hiring and IT; and our IT service providers
<u>Geolocation information</u> Current and past addresses regarding residence.	You, and our electronic communications equipment	Hire the best-qualified applicants, identification verification, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights	Company personnel involved with hiring and third party background check provider
<u>Professional or employment-related information</u> such as job preference and work availability; qualifications;	You, our recruitment service providers, our background check service providers, human resource department and	Hire the best-qualified applicants, identification verification, comply with our legal and contractual	Company personnel involved with hiring, our recruitment service providers, human resources department and background check

employment history and experience; compensation (in accordance with the law); military service; reference and background check information, including relevant criminal history and credit history; pre-employment test results; post-offer medical and medical examination information and results, including drug test results; immigration and work eligibility; and information provided by you during the interview and hiring process	background check team, applicable law enforcement and governmental agencies, your former employers, references you provide, and publicly available sites and sources	requirements, and to establish, exercise our legal and contractual rights	team, our background check service providers, applicable staffing clients, applicable law enforcement and governmental agencies, your former employers, and references you provide
<u>Education information relevant to the job.</u>  <u>Undergraduate or law school attended</u>	You, our recruitment service providers, our background check service providers, human resources department and credentialing team, applicable law enforcement and governmental agencies, your former employers, references you provide, and publicly available sites and sources	Hire the best-qualified applicants, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights	You, our recruitment service providers, our background check service providers, human resource department and background check team, applicable staffing client, applicable law enforcement and governmental agencies, your former employers, and references you provide
<u>Inferences drawn from the personal information collected to determine your abilities and aptitude</u>	Personal information collected about you	Hire the best-qualified applicants, identification verification, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights	Company personnel involved with hiring, human resources department and background check team and our recruitment service providers.

B. Employees:

CATEGORIES OF PERSONAL	SOURCES OF THE PERSONAL INFORMATION	PURPOSES FOR COLLECTING THE	CATEGORIES OF ENTITIES WITH WHOM WE SHARE
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INFORMATION WE COLLECT		PERSONAL INFORMATION	THE PERSONAL INFORMATION
<p><u>Identifiers</u> such as 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.</p>	<p>You</p>	<p>Manage our employment relationship with you, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights</p>	<p>Company human resources, management, and IT personnel; applicable government agencies; and our human resources service providers.</p>
<p><u>Protected categories</u> such as race, color, national origin, religion, sex, disability, age, citizenship status, marital status, medical condition, military or veteran status, and status as a victim of domestic violence, assault, or stalking.</p>	<p>You and Company human resources, legal department and DE&amp;I personnel</p>	<p>Manage our employment relationship with you, comply with our legal and contractual requirements; establish, exercise our legal and contractual rights; and implement the Company's diversity, equality, and inclusion programs.</p>	<p>Company human resources, management, and IT personnel; applicable government agencies; and our human resources service providers.</p>
<p><u>Sensitive Personal Information</u>, such as social security number; driver's license number; state identification card number; passport number; racial or ethnic origin; contents of an individual's mail, email, and text messages unless the Company is the intended recipient of the communication; personal information collected and analyzed regarding an individual's health; financial and bank account information.</p>	<p>You</p>	<p>Manage our employment relationship with you, verify your identity; comply with our legal and contractual requirements; establish, exercise our legal and contractual rights; and implement the Company's diversity, equality, and inclusion programs.</p>	<p>Company human resources, management, and IT personnel; applicable government agencies; and our human resources service providers.</p>
<p><u>Biometric Information</u>, fingerprints and voice prints.</p>	<p>You, Company human resources and management personnel, and</p>	<p>Manage our employment relationship with you, verify your identity and</p>	<p>Company human resources, third-party background check provider, management,</p>

	biometric information service providers	access rights; comply with our legal and contractual requirements; establish, exercise our legal and contractual rights;	and IT personnel; and our human resources service providers.
<u>Internet or other electronic network activity information</u> , such as browsing history, search history, and information regarding your interaction with an internet website, social media site or application	You, our electronic communications equipment, Company human resources, management and IT personnel; and our IT service providers	Manage our employment relationship with you, protect Company and customer information and Company equipment and systems; comply with our legal and contractual requirements; establish, exercise our legal and contractual rights;	Company human resources, management, and IT personnel; applicable government agencies; and our human resources service providers.
<u>Geolocation information</u> Postal address	You, and our electronic communications equipment	Manage our employment relationship with you, verify access rights; comply with our legal and contractual requirements; establish, exercise our legal and contractual rights;	Company human resources, management, and IT personnel; applicable government agencies; and our human resources service providers.
<u>Audio, electronic, visual, or similar information</u> Voicemail, facility surveillance cameras, emails, document review statistics	You, and our electronic communications equipment	Manage our employment relationship with you, verify access rights; comply with our legal and contractual requirements; establish, exercise our legal and contractual rights;	Company human resources, management, and IT personnel; project managers; applicable government agencies; and our human resources service providers.
<u>Professional or employment-related information</u> such as immigration and work eligibility; and information provided by you during the interview and hiring process, performance management	You and Company management, recruiters and human resources personnel	Manage our employment relationship with you, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights	Company human resources, management, and IT personnel; and our human resources service providers.

<p>information, such as employment status (full-time or part-time, regular or temporary); work schedule; job assignments; hours worked; payroll information, direct deposit information, business travel information; expense information, expatriate and secondment assignments; accomplishments and awards; training and development information; performance evaluation information; client assignment history, workplace safety information; medical or health conditions, job restrictions, drug testing information, workplace accident and illness information, and health insurance information; complaint resolution information; discipline and counseling information; and employment termination information.</p>			
<p><u>Inferences drawn from the personal information collected to determine your abilities and aptitude</u></p>	<p>Personal information collected</p>	<p>Manage our employment relationship with you, comply with our legal and contractual requirements, and to establish, exercise our legal and contractual rights</p>	<p>Company human resources, management, and IT personnel; and our human resources service providers.</p>

C. Our Employees' Emergency Contacts

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	SOURCES OF THE PERSONAL INFORMATION	PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	CATEGORIES OF ENTITIES WITH WHOM WE SHARE
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			THE PERSONAL INFORMATION
<u>Identifiers</u> such as a name, alias, postal address, telephone number, and email address.	You and your emergency contacts	Manage our employment relationship with you; contact your designated emergency contact persons in the event of an emergency; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, and IT personnel; and our human resources service providers.
<u>Protected categories</u> such as marital status or other family status.	You and your emergency contacts	Manage our employment relationship with you; contact your designated emergency contact persons in the event of an emergency; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, and IT personnel; and our human resources service providers.

D. Our Employees' Beneficiaries

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	SOURCES OF THE PERSONAL INFORMATION	PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION
<u>Identifiers</u> such as a real name, alias, postal address, telephone number email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	You, your beneficiaries, healthcare providers, and our human resources service providers such as benefits administrators and insurance companies.	Manage our employment relationship with you; administer benefits programs for beneficiaries of our employees; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, and IT personnel; healthcare providers, and our human resources service providers such as benefits administrators and insurance companies.



<p><u>Protected categories</u> such as race, color, national origin, religion, sex (including pregnancy, childbirth, and related medical conditions), disability, age, citizenship status, genetic information, ancestry, marital status, sexual orientation, gender identity and gender expression, AIDS/HIV status, medical condition, military or veteran status, and status as a victim of domestic violence, assault, or stalking.</p>	<p>You, your beneficiaries, healthcare providers, and human resources service providers such as benefits administrators and insurance companies.</p>	<p>Manage our employment relationship with you; administer benefits programs for beneficiaries of our employees; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights</p>	<p>Company human resources, management, and IT personnel; healthcare providers, and our human resources service providers such as benefits administrators and insurance companies.</p>
<p><u>Sensitive Personal Information</u>, such as social security number; driver's license number; state identification card number; passport number; racial or ethnic origin; religious or philosophical beliefs; contents of an individual's mail, email, and text messages unless the Company is the intended recipient of the communication; genetic data; an individual's biometric information used to uniquely identify the individual; personal information collected and analyzed regarding an individual's health.</p>	<p>You, your beneficiaries, healthcare providers, and human resources service providers such as benefits administrators and insurance companies.</p>	<p>Manage our employment relationship with you; administer benefits programs for beneficiaries of our employees; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights</p>	<p>Company human resources, management, and IT personnel; healthcare providers, and our human resources service providers such as benefits administrators and insurance companies</p>
<p><u>Professional or employment-related information</u> such as employer name and contact information and employment health insurance information.</p>	<p>You, your beneficiaries, your beneficiaries' employers, healthcare providers, and human resources service providers such as benefits administrators and insurance companies.</p>	<p>Manage our employment relationship with you; administer benefits programs for beneficiaries of our employees; comply with our legal and contractual requirements; and to</p>	<p>Company human resources, management, and IT personnel; healthcare providers, and our human resources service providers such as benefits</p>

		establish, exercise our legal and contractual rights	administrators and insurance companies
Information necessary to process benefits claims including health and financial information	You, your beneficiaries, your beneficiaries' employers, healthcare providers, and human resources service providers such as benefits administrators and insurance companies.	Manage our employment relationship with you; administer benefits programs for beneficiaries of our employees; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, and IT personnel; healthcare providers, and our human resources service providers such as benefits administrators and insurance companies

E. Independent Contractors:

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	SOURCES OF THE PERSONAL INFORMATION	PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION
<u>Identifiers</u> such as 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.	You, background check companies, other references, and public information	Establish and manage our independent contractor relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, purchasing, and IT personnel; our customers; and our service providers
<u>Sensitive Personal Information</u> , such as social security number; driver's license number; state identification card number; passport number; account log-in; financial and bank account information; debit card number, credit card number	You, background check companies, other references, and publicly available sites and sources	Establish and manage our independent contractor relationship with you; verify your identity; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, purchasing, and IT personnel; and our service providers
<u>Internet or other electronic network activity information</u> , such as browsing	You, our electronic communications equipment, Company human resources,	Establish and manage our independent contractor relationship with you;	Company human resources, management, financial, purchasing, and IT

history, search history, and information regarding your interaction and presence with or on an internet website, social media site or application	management and IT personnel; and our IT service providers	comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	personnel; and our IT service providers
<u>Professional or employment-related information</u> such as qualifications and experience, reference and other due diligence information; W-9 Information, business name; Social Security number or Taxpayer Identification Number (TIN)	You, background check companies, other references, and publicly available sites and sources	Establish and manage our independent contractor relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, purchasing, and IT personnel; customers; and our service providers
<u>Education information relevant to the services provided</u>	You, background check companies, other references, and publicly available sites and sources	Establish and manage our independent contractor relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, purchasing, and IT personnel; customers; and our service providers
<u>Inferences drawn from the personal information collected to determine your abilities and aptitude</u>	Personal information collected about you	Establish and manage our independent contractor relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, purchasing, and IT personnel; our customers; and our service providers

F. Our Board of Directors:

We collect the following categories of personal information for the purposes described below:

CATEGORIES OF PERSONAL INFORMATION WE COLLECT	SOURCES OF THE PERSONAL INFORMATION	PURPOSES FOR COLLECTING THE PERSONAL INFORMATION	CATEGORIES OF ENTITIES WITH WHOM WE SHARE THE PERSONAL INFORMATION
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<u>Identifiers</u> such as 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.	You, public business sources, references, background check service providers	Establish and manage our relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, and IT personnel; customers; shareholders; customers, the public; government agencies; and service providers
<u>Sensitive Personal Information</u> , such as social security number; driver's license number; state identification card number; passport number; financial and bank account information	You, references, background check service providers	Establish and manage our relationship with you; verify your identity; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, purchasing, and IT personnel; and service providers
<u>Internet or other electronic network activity information</u> , such as browsing history, search history, and information regarding your interaction or presence with or on an internet website, social media site or application	You, electronic communications equipment, Company human resources, management and IT personnel; IT service providers	Establish and manage our relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, purchasing, and IT personnel; and service providers
<u>Professional or employment-related information</u> such as qualifications and experience, reference and other due diligence information; W-9 Information, business name; Social Security number or Taxpayer Identification Number (TIN)	You, public business sources, references, background check service providers	Establish and manage our relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, and IT personnel; customers; shareholders; customers, the public; government agencies; and service providers
<u>Education information relevant to the services provided</u>	You, public business sources, references, background check service providers	Establish and manage our relationship with you; comply with our legal and contractual requirements; and to establish, exercise our	Company human resources, management, financial, and IT personnel; customers; shareholders; customers, the public;

		legal and contractual rights	government agencies; and service providers
<u>Inferences drawn from the personal information collected to determine your abilities and aptitude</u>	Personal information collected about you	Establish and manage our relationship with you; comply with our legal and contractual requirements; and to establish, exercise our legal and contractual rights	Company human resources, management, financial, and IT personnel; customers; shareholders; customers, the public; government agencies; and service providers

G. Corporate Officers:

To the extent that our Corporate Officers are employees of the Company, we collect the personal information listed above for employees and use the information for the same purposes.

**4. Privacy Rights**

As a California resident, you have the following privacy rights regarding your personal information:

- The right to know and right to access the personal information we have collected about you, including the categories of personal information; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting, selling, or sharing personal information; the categories of third parties to whom the business discloses personal information; and the specific pieces of personal information the business has collected about the consumer;
- The right to delete personal information that we have collected from you, subject to certain exceptions;
- The right to correct inaccurate personal information that we maintain about you;
- The right of portability, or right to have us transfer your personal information to other persons or entities upon your request;
- The right to limit the use of your sensitive information if we decide in the future to use such information for purposes other than the purposes listed above; and
- The right not to be discriminated or retaliated against for exercising your of privacy rights.

You can exercise you privacy rights by submitting a request to us by emailing us at: [cpa@hirecounsel.com](mailto:cpa@hirecounsel.com) calling us at: 646-356-0550; or asking our Human Resources department for a written request form at [cpa@hirecounsel.com](mailto:cpa@hirecounsel.com). To protect the security of your personal information, we will require you to provide us with identifying information for you such as personal email address, personal telephone number, employee identification number, and/or other information that we can match with the personal information we have collected about you to verify your identity.

You may use an authorized agent to request access to or deletion of your personal information. We will require your authorized agent to provide us with either (1) a power of attorney authorizing the authorized agent to act on your behalf or (2) your written authorization permitting the authorized agent to request access to your personal information on your behalf. Further, we will require you or your authorized agent to provide us with identifying information to verify your identity. We may also require you to either verify

your own identity directly with us or directly confirm with us that you provided the authorized agent permission to submit the request.

Within 10 days of receiving your request to know, we will confirm receipt of your request and provide information about how we will process your request. Generally, we will respond to your request within 45 days. If we need more time to respond, we will provide you with notice and an explanation of the reason we need more time to respond. We may deny your request if we cannot verify your identity or are legally permitted to deny your request. If we deny your request, we will explain the basis for the denial, provide or delete any personal information that is not subject to the denial, and refrain from using the personal information retained for any purpose other than permitted by the denial. We will maintain a record of your request and our response for 24 months.

## **5. DATA SECURITY**

While no data security system can fully protect personal information from unauthorized data breaches, The Company has implemented reasonable safeguards and controls, consistent with its legal obligations under California and other local, state and federal laws. The Company is committed to: (i) seeking to safeguard all personal information that you provide to us; (ii) seeking to ensure that it remains confidential and secure; and (iii) taking all reasonable steps to ensure that personal privacy is respected. All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorized access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members of the Company and our services providers who need to know that information for the purposes identified in our privacy policy and privacy notices.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **6. DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, we retain personal information for the duration of our relationship with you plus any legally required record or data retention period and/or any period of time necessary to exercise our legal rights. Thereafter, we will securely destroy your personal information in accordance with the Company's record retention policies.

In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **7. PERSONAL INFORMATION OF MINORS**

The Company does not sell or share personal information for individuals under the age of 16.

## **8. CHANGES TO THIS PRIVACY POLICY**

As we strive to improve our practices, we may revise the Company's privacy policy from time to time. This privacy policy is not a contract and we reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy. It is your responsibility to check this policy from time to time for any changes.

This privacy policy was last updated on May 22, 2023.

**9. QUESTIONS AND FURTHER INFORMATION**

If you have any questions or would like further information regarding this privacy policy or our privacy practices, please contact us at: [cpra@hirecounsel.com](mailto:cpra@hirecounsel.com).