

JOB APPLICANT PRIVACY POLICY

Scope

California Commerce Club, Inc. (the “**Company**,” “**our**,” “**us**,” or “**we**”) has developed this Privacy Policy out of respect for the privacy of our job applicants. This policy describes the Personal Information we collect, use, and disclose about individuals who apply for a position of employment. This is also to provide you with notice at or before the point at which we collect Personal Information from you informing you of what information we collect, how we use it, how long we retain it, and whether we sell it or share it for cross-context behavioral advertising purposes (*we don't by the way*). Personal Information is any information that could reasonably identify you.

This Privacy Policy applies only to your interaction with the Company in the capacity of a job applicant. It does not apply to other contexts, such as if you are hired for employment, in which case you would be provided with access to a privacy policy that covers information collected in the employment context, or if you visit our public-facing website or engage in transactions with the Company in other capacities (as a client, customer, or independent contractor), in which case the privacy policy <https://commercecasino.com/privacy/> on our website would apply to those interactions.

Collection of Personal Information and Sensitive Personal Information

When you apply for a position or interact with us regarding potential job openings, we may collect Personal Information from you in a variety of different situations and using a variety of different methods, including, but not limited to, through our website, your mobile device, through email, written materials, in physical locations, and/or over the telephone. Generally, we will or may collect, and we have in the last 12 months collected, the following categories of Personal Information from or about job applicants. For each category of information, we identify the categories of third parties, service providers, and contractors to whom we have disclosed the information in the last 12 months. The examples provided in each category are not intended to be an exhaustive list or an indication of all specific pieces of information we collect from or about you in each category, but rather the examples are to provide a meaningful understanding of the types of information that may be collected within each category.

Category	Identifiers
Examples	Name, alias, social security number, date of birth, driver's license or state identification card number, passport number, or Company ID number.
Disclosed in Last 12 Months To	<ul style="list-style-type: none">• Government agencies• Talent acquisition management systems and applicant tracking systems• Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process• Recruiting firms and/or staffing agencies• Social media platforms

	<ul style="list-style-type: none"> • Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants • Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases • Our affiliated entities, including parent and subsidiary entities
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Category	Contact Information
Examples	Home, postal or mailing address, email address, or home or cell phone number.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> • Government agencies • Talent acquisition management systems and applicant tracking systems • Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process • Recruiting firms and/or staffing agencies • Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants • Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases • Our affiliated entities, including parent and subsidiary entities

Category	Pre-Hire Information
Examples	Information provided in your job application or resume, information gathered as part of background screening and reference checks, pre-hire drug test results, information recorded in job interview notes by persons conducting job interviews for the Company, information contained in candidate evaluation records and assessments, information in work product samples you provided, and voluntary disclosures by you, such as protected classifications.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> • Talent acquisition management systems and applicant tracking systems • Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process • Recruiting firms and/or staffing agencies

	<ul style="list-style-type: none"> • Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases • Our affiliated entities, including parent and subsidiary entities
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Category	Professional or Employment-Related Information
Examples	Information regarding prior job experience, positions held, and when permitted by applicable law your salary history or expectations.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> • Talent acquisition management systems and applicant tracking systems • Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process • Recruiting firms and/or staffing agencies • Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases • Our affiliated entities, including parent and subsidiary entities

Category	Education Information
Examples	Information from resumes regarding educational history; information obtained from transcripts or records of degrees and vocational certifications obtained.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> • Talent acquisition management systems and applicant tracking systems • Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process • Recruiting firms and/or staffing agencies • Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases • Our affiliated entities, including parent and subsidiary entities

Category	Online Portal and/or Mobile App Access and Usage Information
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Examples	Where job applicant or candidate must create an account to apply for a job, the applicant's username and password, account history, usage history, file access logs, and any information submitted through the account.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> • Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process • Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants • Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases

Category	Inferences
Examples	Based on analysis of the Personal Information collected, we may develop inferences regarding job applicants' predispositions, behavior, attitudes, intelligence, abilities, and aptitudes for purposes of recruiting and hiring assessments and decisions.
Disclosed in Last 12 Months To	<ul style="list-style-type: none"> • Talent acquisition management systems and applicant tracking systems • Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process • Recruiting firms and/or staffing agencies • Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases

What Sensitive Personal Information We Collect

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information we plan to collect:

- Identifiers (social security, driver's license, state identification card, or passport number)
- Online Portal and/or Mobile App Access and Usage Information (if required to create an account to apply for a job, your account log-in, in combination with any required security or access code, password, or credentials allowing access to the account)
- Medical and Health Information

Personal Information *does not* include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the job applicant or from widely distributed media.
- Information made available by a person to whom the job applicant has disclosed the information if the job applicant has not restricted the information to a specific audience.
- De-identified or aggregated information.

Sources of Personal Information

We may collect your Personal Information from the following sources:

- You, the applicant, when you apply for a position of employment or voluntarily submit information
- Company systems, networks, software applications, and databases you log into or use in the course of applying for a position with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases
- Surveillance cameras at our physical locations
- Credit and consumer reporting agencies
- Government agencies
- HR support vendors
- Recruiting firms and/or staffing agencies
- Job platforms and career sites like Glassdoor, Indeed, LinkedIn, ZipRecruiter, etc.
- Personal references and former employers
- Schools, universities, or other educational institutions which you attended
- From friends, family, or colleagues who choose to email you jobs that they think you may be interested in from our application platform
- Our employees, contractors, vendors, suppliers, guests, visitors, other consumers, and customers based on your interactions with them (if any)

To Whom We Disclose Personal Information

We may disclose your Personal Information to the following categories of service providers, contractors, or third parties:

- Government agencies
- Talent acquisition management systems and applicant tracking systems

- Vendors providing services for purposes of our human resources information system (HRIS) and management of job applicant data and recruiting process
- Recruiting firms and/or staffing agencies
- Credit and consumer reporting agencies
- Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants
- Company systems, networks, software applications, and databases you log into or use in your interaction with the Company, including from vendors the Company engages to manage or host such systems, networks, applications or databases
- Social media platforms
- Our affiliated entities, including parent and subsidiary entities

Reasons Why We Collect, Use, Retain, and Disclose Personal Information

We may collect, use, and disclose your Personal Information for any of the following business purposes:

1. To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job with the Company, we will use that Personal Information in connection with your candidacy for employment.
2. To comply with local, state, and federal laws and regulations requiring employers to maintain certain records (such as immigration compliance records, accident or safety records, and tax records).
3. To evaluate, make, and communicate decisions regarding your job application and candidacy for employment.
4. To obtain and verify background checks, references, and employment history.
5. To communicate with you regarding your candidacy for employment.
6. To permit you to create a job applicant profile, which you can use for filling out future applications if you do not get the job you are applying for.
7. To keep your application on file even if you did not get the job applied for, in case there is another position for which we want to consider you as a candidate even if you do not formally apply.
8. To evaluate and improve our recruiting methods and strategies.
9. To engage in lawful monitoring of job applicant activities and communications when they are on Company premises, or utilizing Company internet and WiFi connections, computers, networks, devices, software applications or systems.
10. To engage in corporate transactions requiring review or disclosure of job applicant records subject to non-disclosure agreements, such as for evaluating potential mergers and acquisitions of the Company.

11. To evaluate, assess, and manage the Company's business relationship with vendors, service providers, and contractors that provide services to the Company related to recruiting or processing of data from or about job applicants.
12. To improve job applicant experience on Company computers, networks, devices, software applications or systems, and to debug, identify, and repair errors that impair existing intended functionality of our systems.
13. To protect against malicious or illegal activity and prosecute those responsible.
14. To prevent identity theft.
15. To verify and respond to consumer requests from job applicants under applicable consumer privacy laws.
16. To conduct risk assessments under applicable consumer privacy laws.
17. To conduct cybersecurity audits under applicable consumer privacy laws.
18. To conduct internal audits, compliance assessments, data analytics, and quality assurance activities.
19. To engage in strategic planning and operational efficiency.
20. To develop and improve our products and services based on your input, including developing, testing, and training our own custom software

We do NOT and will not sell your Personal Information in exchange for monetary or other valuable consideration. We do not share your Personal Information for cross-context behavioral advertising.

We do NOT and will not use or disclose your Sensitive Personal Information for any purpose that gives rise to a right to limit the use or disclosure of your Sensitive Personal Information under the California Consumer Privacy Act (CCPA).

Retention of Personal Information

We will retain each category of Personal Information for as long as we continue to have a legal or business need to retain it consistent with the purposes for which the information was collected. Your Personal Information may be stored or maintained in a variety of different records, files, databases, and information systems some of which are controlled or managed by vendors. As a result, we are unable to predict at the point of collection of your information how long the information will be retained, as it depends on many factors. In deciding how long to retain each category of Personal Information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; applicable statute of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

Because the law prescribes minimum periods for retention of certain records, some records will be retained for at least the duration of the required period plus a certain number of years. Retention is often measured from occurrence of a triggering event but we may also measure the retention period from either (1) the date the record or data was collected, created, or last modified, (2) the date of the particular transaction to which

the record or data pertains, or (3) another triggering event that is determined to be reasonable and appropriate based on the nature of the data and the legal/business needs for its continued use.

If the business purposes for collecting the Personal Information, and legal reasons for retaining the Personal Information, have both expired, we will purge the information in a secure manner.

Third-Party Vendors

We may use other companies and individuals to perform certain functions on our behalf. Such parties only have access to the Personal Information needed to perform these functions and may not use or store the information for any other purpose.

Business Transfers

In the event we sell or transfer a particular portion of our business assets, applicant information may be one of the business assets transferred as part of the transaction. If substantially all of our assets are acquired, applicant information may be transferred as part of the acquisition.

Compliance With Law and Safety

We may disclose specific Personal and/or Sensitive Personal Information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect our employees or the public.

Passwords

The personal data record created through your registration for your Company account can only be accessed with the unique password associated with those records. To protect the integrity of the information contained in those records, you should not disclose or otherwise reveal your passwords to third parties.

Job Applicants Under the Age 16

As we do not even accept applications from anyone under the age of 18, we do not knowingly sell or share the personal information of job applicants under 16 years of age.

How We Protect the Information That We Collect

The protection of the information that we collect about applicants is of the utmost importance to us and we take every reasonable measure to ensure that protection, including:

- We keep automatically collected data and voluntarily collected data separate at all times.
- We use internal encryption on all data stores that house voluntarily captured data.
- We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- We restrict access to private information to those who need such access in the course of their duties for us.

Rights Under the CCPA

If you are a California resident, you have the following rights pursuant to the CCPA:

Right to Know	The right to request that we identify (1) the categories of Personal Information we have collected about you, (2) the categories of sources from which the Personal Information was collected, (3) the business or commercial purpose for collecting, selling, or sharing this information, (4) the categories of third parties with whom we disclose Personal Information, (5) the categories of Personal Information we sold or shared about you, and for each category identified, the categories of third parties to whom we sold or shared that particular category of Personal Information, and (6) the categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of service providers or contractors to whom we disclosed that particular category of Personal Information.
Right to Access	The right to request that we provide you access to or disclose to you the specific pieces of Personal Information we have collected from or about you.
Right to Delete	The right to request that we delete Personal Information that we collected from you, subject to certain exceptions.
Right to Correct	The right to request that we correct inaccurate Personal Information (to the extent such an inaccuracy exists) that we maintain about you, and ensure any corrected data remains corrected.
Right to No Retaliation	The right to not be retaliated against for exercising privacy rights conferred by the CCPA, including when a consumer is an applicant to an educational program, a job applicant, a student, an employee, or an independent contractor.

Submitting a Consumer Request

You can submit any of the above types of consumer requests through any of the options below:

1. Submit an online request on our at <https://commercecasino.com/>.
2. Call our privacy toll-free line at 877-927-2150.
3. Complete a paper form, which can be requested at Guest Services Desk, located at California Commerce Club, Inc., 6131 Telegraph Road, Commerce, California 90040.

How We Will Verify That it is Really You Submitting the Request:

If you are a California resident, when you submit a Right to Know, Right to Access, Right to Delete, or Right to Correct request through one of the methods provided above, we will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular information in our possession, which depends on the nature of your relationship and interaction with us.

Responding to your Right to Know, Right to Access, Right to Delete, and Right to Requests

Upon receiving a verifiable request from a California resident, we will confirm receipt of the request no later than 10 business days after receiving it. We endeavor to respond to a verifiable request within 45 calendar days of its receipt. If we require more time (up to an additional 45 calendar days, or 90 calendar days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

For a request to correct inaccurate Personal Information, we will accept, review, and consider any documentation that you provide, and we may require that you provide documentation to rebut our own documentation that the Personal Information is accurate. You should make a good-faith effort to provide us with all necessarily information at the time that you make the request to correct. We may deny a request to correct if we have a good-faith, reasonable, and documented belief that a request to correct is fraudulent or abusive. If we deny your request to correct, we shall inform you of our decision not to comply and provide an explanation as to why we cannot comply with a request, if applicable.

If You Have an Authorized Agent:

If you are a California resident, you can authorize someone else as an authorized agent who can submit a request on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized power of attorney, or (b) provide other written, signed authorization that we can then verify. When we receive a request submitted on your behalf by an authorized agent who does not have a power of attorney, that person will be asked to provide written proof that they have your permission to act on your behalf. We will also contact you and ask you for information to verify your own identity directly and not through your authorized agent. We may deny a request from an authorized agent if the agent does not provide your signed permission demonstrating that they have been authorized by you to act on your behalf.

Consent to Terms and Conditions

By applying for a position with the Company or submitting any information for purposes of being considered for or inquiring about employment with the Company, you consent to all terms and conditions expressed in this Privacy Policy.

Changes to Our Privacy Policy

As our services evolve and we perceive the need or desirability of using information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check our website frequently to see the current Privacy Policy in effect and any changes that may have been made to them. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on this website. Please check back here periodically or contact us at the address listed at the end of this Privacy Policy.

Consumers With Disabilities

This policy is in a form that is accessible to consumers with disabilities.

Questions About the Policy

If you have any questions about this Privacy Policy, please contact us at dataprivacy@commercecasino.net or call 877-927-2150.

*****Updated April 2, 2026.***