



Privacy Notice For California Candidates

California law requires that we provide you this notice about the collection and use of your personal information. We encourage you to read it carefully.

This Privacy Notice (“Notice”) describes how NFP Corp. and its subsidiary companies (“we”, “us” or “NFP”) collects, handles and processes personal information about California residents who apply or are recruited for a job or engagement by us, and the purposes for which we use that information.

For purposes of this Notice, “personal information” has the meaning given in the California Consumer Privacy Act of 2018 (the “CCPA”) but excludes information exempted from the CCPA’s scope.

The Notice is a statement of our practices and of rights regarding your personal information and is not a contractual document and does not create any rights or obligations on either party (beyond those which already exist under data protection laws) or create of form any part of an employment or independent contractor agreement.

PERSONAL INFORMATION WE COLLECT, USE AND SHARE

The categories of personal information we may collect and process during the application and recruitment process include:

- **Contact information**, such as home address, telephone number, and email address;
- **Information from job application materials or recruiters**, such as your job application, resume or CV, cover letter, writing samples, references, work history, education transcripts, whether you are subject to prior employer obligations, and information that referrers provide about you;
- **Professional qualifications**, such as licenses, permits, memberships, and certifications;
- **Information from the application process**, such as any phone-screens, interviews, evaluations and outcomes of recruiting exercises;
- **Immigration status** and other information that would allow us to verify your employment eligibility;
- **Biographical information**, such as name, gender, date of birth, professional history, references, language proficiencies, education details, and information you make publicly available through job search or career networking sites;
- **Job preferences**, such as desired position and compensation, location preferences and willingness to relocate;
- **Employment history**;
- **Background check information**, such as information necessary to complete background, credit, drug/alcohol and/or other checks when permitted by law, and information received during these checks;
- **Information needed to understand and assess accommodation requests regarding potential disabilities or other health conditions**; and
- **Other information you provide to us.**

Providing personal information to us is voluntary. However, if you do not provide sufficient information, we may be unable to consider your application or, if you are hired, your subsequent promotion, transfer or relocation.

In certain cases, we may ask you for additional information for purposes of monitoring equal opportunity and/or complying with applicable laws. We may also inquire about criminal records. We will do so only where permitted by applicable law.

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

- **Recruitment management.** Managing recruitment generally, such as:



- operating any careers website we maintain at or any other site to which this Notice is posted (“Careers Site”);
- recruiting, interviewing and evaluating job candidates;
- conducting background checks and other pre-employment screening (where permitted by law);
- analyzing and improving our application and recruitment processes;
- accommodating disabilities or health conditions;
- communicating with you regarding your candidacy, opportunities with the NFP or about the Careers Site and any changes to applicable terms or policies; and
- other business operations.
- **Compliance, safety and fraud prevention**, such as:
 - complying with or monitoring compliance with legal and other requirements, such as reporting and equal opportunities monitoring requirements, where applicable;
 - complying with internal policies and procedures;
 - complying with lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
 - protecting our, your or others’ rights, safety and property;
 - investigating and deterring against fraudulent, harmful, unauthorized, unethical or illegal activity, or conduct in violation of our policies or procedures; and
 - sharing information with government authorities, law enforcement, courts or private parties where we have a good-faith belief it is necessary for the foregoing purposes.
- **Analytics**. Creating anonymous, aggregated or de-identified data that we use and share to analyze our application and recruitment activities, business and for other lawful business purposes.

We may share your personal information with other parties as necessary for the purposes described above. By way of example and not limitation, we may share your personal information with:

- **Affiliates**. Our corporate parent, subsidiaries, and other affiliates under the control of our corporate parent, for purposes consistent with this Notice or to operate shared infrastructure, systems and technology.
- **NFP service providers**. Providers of services to the NFP, such as payroll administration, benefits and wellness, human resources, occupational health, performance management, training, expense management, travel agencies, transportation and lodging, IT systems and support, information and physical security, background checks and other screenings, equity award administration, corporate banking and credit cards, health care, trade associations, insurance brokers, claims handlers and loss adjusters, and any necessary third party administrators, nominees, registrars or trustees appointed in connection with benefits plans or programs.
- **Government authorities, law enforcement and others**. Government authorities, law enforcement, courts, and others as described in the Compliance, safety, fraud prevention section above.
- **Business transfer participants**. Parties to transactions and potential transactions whereby we sell, transfer or otherwise share some or all of our business or assets, including your personal information, such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.
- **Professional advisors**. Accountants, auditors, lawyers, immigration advisors, insurers, bankers, and other outside professional advisors who require your information in the course of providing their services.
- **Customers and business partners**. Customers, other companies and individuals with whom the NFP does business or is exploring a business relationship.

OTHER INFORMATION ABOUT THIS NOTICE; CONTACT

This Notice does not address, and we are not responsible for, the practices of any third parties, which have their own rules for how they collect and use your personal information. Our links to third party websites or services are not endorsements. It is your responsibility to ensure that information you submit does not violate any third party’s rights. You should keep your personal information on file with the NFP up to date and inform us of any significant changes to it.

If you have questions about this Notice, you may contact the NFP HR department or the NFP privacy office as follows:



Email: privacyoffice@nfp.com
Address: NFP Privacy Office
1250 Capital of Texas Highway, Suite 600
Austin, TX 78746
Toll-Free Phone: (866) 824-3817

CHANGES TO THIS NOTICE

We reserve the right to make changes to this Notice at any time. Such changes will be posted in our PeopleFirst Portal or any other on any website or other location where we make it available to you. We encourage you to review the website and Notice periodically for any updates or changes.

This Notice is effective as of January 1, 2020.