

Vantage Recruiting Privacy Notice

Last Updated: November 2023

Vantage Group Holdings Ltd. and its subsidiaries (collectively, “Vantage”) takes your privacy seriously. Please carefully read this Privacy Notice (“Privacy Notice” or “Notice”) to familiarize yourself with our privacy practices regarding your personal information and how we will use it.

This Privacy Notice applies to all candidates and applicants for full-time, part-time or temporary employment with Vantage, including internships or volunteer positions (“Applicants”). Vantage’s social media platforms may use services such as Facebook, LinkedIn, and Twitter. This Privacy Notice does not apply to any social media platform provider, but does apply to any personal information Vantage may receive or have access to through such platforms.

To make this document more readable, “Company”, “we”, “us”, and “our” refer to Vantage. “You” and “your” refers to Applicants.

This Privacy Notice describes how Vantage collects and uses your personal information provided to us in connection with your application, either directly by you or on your behalf. It also describes the rights residents of certain states may have regarding their personal information.

We may revise this Privacy Notice from time to time. We will post any changes on this page and update the date at the top.

[Additional Notice to California Residents](#)

Personal Information We Collect

We may collect information that identifies an individual or from which an individual can be directly or indirectly identified (“personal information”). Personal information does not include publicly available information from government records, or deidentified or aggregated information.

We may collect personal information about you either directly from you, including through submission of your application, or through your agents or representatives or other third parties that assist us in evaluating your application.

Personal information we may collect includes:

- An individual’s name, age, date or place of birth, physical address, email address, user logon account name and passwords, phone or other contact details, Social Security number, driver’s license or government issued identification number, passport number, signature, physical characteristics or description, or other similar identifiers or personal information;
- Other sensitive information such as race, ethnicity, ancestry, national origin, citizenship, medical condition, physical or mental health, disability, sex (including gender, gender

identity, gender expression, pregnancy/childbirth and related medical status), sexual orientation, veteran or military status, and criminal convictions;

- Information about a person's professional, employment or educational background, such as current or past job history, dates of hire, promotion, termination, references, information regarding qualifications, degrees obtained, licensing, and disciplinary record and any other information included or provided by you with your application; and
- Online identifiers (e.g., Internet Protocol address, including approximate physical location derived therefrom), internet or other electronic network activity regarding your interaction with our applicant management system.

How We Use Personal Information

Vantage may use your personal information as may be necessary to evaluate your application and otherwise operate our business, including:

- Recruiting activities, including evaluating your application for employment, verifying employment, immigration or visa status, scheduling and conducting job interviews, processing interview feedback, scheduling and reimbursing for your travel, performing background screening, extending offers of employment where appropriate and coordinating on-boarding;
- Vantage's risk management and operational purposes, including procuring corporate insurance and cooperating with the investigation and settlement of any claims made there under;
- Investigating and resolving complaints, grievances or misconduct, including complaints involving, or requests for access to, deletion or correction of, your personal information;
- Preparing for and acting in relation to inquiries, investigations or proceedings, by governmental, administrative, judicial or regulatory authorities, including civil litigation;
- Comply with laws and legal processes, including responding to court, regulatory or governmental requests, defending legal claims and fulfilling ordinary course legal and regulatory filing obligations;
- Protect Vantage's privacy and property, as well as the privacy and property of you or others;
- Prevent, detect and investigate fraud and other activities that violate our corporate policies, contractual commitments, or that are illegal;
- As otherwise allowed, or required, by applicable law including laws other than those of your location; and
- any other purposes relating to carrying out our business.

We also may anonymize, combine or aggregate any of the information we collect for any of these purposes, or to analyze trends or statistics.

How We May Disclose Personal Information

Vantage does not sell your personal information or provide it to third-parties for their direct marketing purposes. We may disclose personal information that we collect, or you provide as described in this Privacy Notice under the following circumstances:

- To transfer data to our affiliates from time to time for our business purposes. Affiliates are defined as subsidiaries, parent companies, joint ventures, and other corporate entities under common Vantage ownership.
- To contractors, service providers and other third parties that use it only for our business purposes, including third-parties to help detect and protect against fraud or data security vulnerabilities.
- To a buyer, investor, or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Vantage's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Vantage about our Website users is among the assets transferred.
- To fulfil the purpose for which you provide it.
- As otherwise permitted or required by law, including to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities.

Security

We are committed to maintaining your confidence and trust and take steps to help protect the personal information you provide to us. However, no transmission or electronic storage of information is guaranteed to be secure. We therefore urge you to always use caution when transmitting information over the internet.

Your Privacy Rights

Depending on your location, you may have certain rights with respect to your personal information that we hold about you. These rights may include the right to request access to, correction and/or deletion of your personal information or limitation of the use of your personal information. If you wish to exercise any applicable rights or have any other inquiries or complaints in relation to your personal information, please refer to the "Contact Us" section below.

International Transfers

Our network and application platforms are hosted in the United States. All personal information you submit to us will be transferred to the United States.

By providing personal information and other information to Vantage, including through our networks or application platforms, and/or by sending a communication to a "vantagerisk.com" e-mail address, you understand and consent to the collection, use, processing disclosure and transfer of such information in the United States and other countries or territories in accordance with the terms of this Privacy Notice, which may not offer the same level of data protection as the country where you reside. Further, please note that any communication you send to a "vantagerisk.com" e-mail address will be routed through the United States.

Third-party Services and Websites

Vantage's application platform is hosted by a third party and include links to third-party websites. This Privacy Notice does not apply to information you provide to third-party websites. Vantage is not responsible for the privacy or other practices, including security practices, of any third-party website, nor does use of a third-party website within Vantage's sites mean that Vantage endorses these websites or the services they provide. Accordingly, we recommend that you review the privacy policies posted on any website that you may access through these links.

Collection of Information from Children

We do not employ or contract with children under the age of 13 and do not knowingly collect personal information from such minors.

Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us via the information in the "Contact Us" section below.

Feedback or Questions

If you have questions or comments, please refer to the "Contact Us" section below.

Contact Us

If there are any questions regarding this Policy, or to request a copy of this Policy in another format, you may contact us using any of the methods below:

- Phone: 833-552-1772.
- E-mail: inquires@vantagerisk.com
- Mail: Vantage Services LLC
123 North Wacker Dr., Suite 1300
Chicago, IL 60606

Vantage Recruiting Privacy Notice - California Privacy Rights and Disclosures

This Notice applies solely to California residents and supplements other privacy notices you may receive in connection with your relationship with us. California residents may have separate rights regarding your personal information, in accordance with California law, including the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively the “CCPA”). The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a California consumer or household.

Personal information does not include publicly available information from federal, state or local government records; de-identified or aggregated consumer information; or information excluded from the CCPA’s scope, such as personal information covered by the Fair Credit Reporting Act, or processed pursuant to the Gramm-Leach-Bliley Act, California Financial Information Privacy Act or the Driver’s Privacy Protection Act of 1994 if in conflict with such acts and their implementing regulations.

Notice at Collection: Personal Information We Collect and Have Collected in the Past 12 Months

We collect the following categories of applicant personal information and have collected it in the 12 months prior to the date of this Notice:

CCPA Category	Description
Personal Identifiers	Name, physical address, email address, contact details (for you, your emergency contacts), date of birth, Social Security number, driver’s license information or passport information.
Personal Data described in Cal. Civ. Code § 1798.80(e)	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, education, employment, employment history, information. Some personal information included in this category may overlap with other categories.
Protected Class Information	Age (40 and over), race, ethnicity, ancestry, national origin, citizenship, medical condition, disability, sex (including gender, gender identity, gender expression), veteran or military status.
Internet or other electronic activity information	online identifiers (e.g., internet Protocol address, including approximate physical location derived therefrom), Internet or other electronic network activity regarding your interaction with our website or applicant management system.

Audio, electronic, visual, thermal, olfactory or similar information	Recordings of audio or video calls or messages.
Professional or employment information	Current or past job history (including internal and external work history and references), professional licenses or certifications, immigration or work visa status; records regarding your work location, job title and seniority and any other information included or provided by you with your application.
Education information	Educational institutions attended, degrees or certifications obtained, continuing education information, grades, transcripts.
Sensitive Personal information	Social Security number, driver's license number, passport number, racial or ethnic origin or other diversity data, disability status.

Notice at Collection: Purposes for Collection of Personal Information

As described in the “How We Use Your Personal Information” section above, we use applicant personal information as may be necessary to evaluate your application and otherwise operate our business, including:

- Recruiting activities, including evaluating your application for employment, verifying employment, immigration or visa status, scheduling and conducting job interviews, processing interview feedback, scheduling and reimbursing for your travel, performing background screening, extending offers of employment where appropriate and coordinating on-boarding;
- Vantage’s risk management and operational purposes, including procuring corporate insurance and cooperating with the investigation and settlement of any claims made there under;
- Investigating and resolving complaints, grievances or misconduct, including complaints involving, or requests for access to, deletion or correction of, your personal information;
- Preparing for and acting in relation to inquiries, investigations or proceedings, by governmental, administrative, judicial or regulatory authorities, including civil litigation;
- Comply with laws and legal processes, including responding to court, regulatory or governmental requests, defending legal claims and fulfilling ordinary course legal and regulatory filing obligations;
- Protect Vantage’s privacy and property, as well as the privacy and property of you or others;

- Prevent, detect and investigate fraud and other activities that violate our corporate policies, contractual commitments, or that are illegal;
- As otherwise allowed, or required, by applicable law including laws other than those of your location; and
- any other purposes relating to carrying out our business.

Any sensitive personal information is only used or disclosed as necessary for the business purposes described above.

We also may anonymize, combine or aggregate any of the information we collect for any of these purposes, or to analyze trends or statistics.

Notice at Collection: Personal Information We Have Disclosed for Business Purposes in the Past 12 Months

The categories of applicant personal information we have disclosed for a business purpose in the preceding 12 months include: personal identifiers, Personal Information described in Cal. Civ. Code § 1798.80(e), protected class information, commercial information, internet or other electronic activity information, audio, electronic, visual, thermal, olfactory or similar information, professional or employment information, education information and sensitive personal information.

With respect to **personal identifiers, Personal Information described in Cal. Civ. Code § 1798.80(e), protected class information, professional or employment information, education information** and **sensitive personal information**, the categories of third parties and other recipients to whom we have disclosed such personal information for a business purpose include entities, including our subsidiaries and affiliates, that

- assist us with recruitment, employment verification and background checks;
- provide security services and cloud-based data storage, or provide other IT-related services;
- provide workplace analytics; and
- provide legal services.

We have also disclosed **internet or other electronic activity information** and **audio, electronic, visual, thermal, olfactory or similar information** to entities, including our subsidiaries and affiliates, that: provide data security services and cloud-based data storage, or provide other IT-related services; and provide workplace analytics.

Additional Information About How We May Disclose Applicant Personal Information

We may also disclose applicant personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and

regulatory authorities. We may also disclose applicant personal information to third parties to help detect and protect against fraud or data security vulnerabilities. We may also disclose or transfer applicant personal information to a third party in the event of an actual or potential sale, merger, reorganization of our entity or other restructuring.

Notice at Collection: Categories of Personal Information We Sell or Share and Related Information

We do not sell applicant personal information, nor do we share applicant personal information for purposes of cross-context behavioral marketing.

Notice at Collection: Retention Periods

We retain the categories of applicant personal information we collect for the length of time necessary to evaluate applications, comply with legal obligations and to protect our legal rights.

Sources of Collection

We collect applicant personal information from applicants directly, from recruiting and/or staffing agencies, from any individuals or professional contacts that may provide references or other information about applicants, from our employees or contractors that may interview or otherwise evaluate applicants, from background check and other employment verification firms, and from publicly-available sources.

Your Rights Under the CCPA

The CCPA gives California residents rights described below with respect to their personal information.

Your Right to Request Disclosure of Personal Information We Collect About You

You can ask us for any or all of the following information with respect to the applicant personal information that we have collected about you since January 1, 2022:

- Specific pieces of personal information we have collected about you;
- Categories of personal information we have collected about you;
- Categories of sources from which such personal information was collected;
- Categories of personal information that we sold or disclosed for a business purpose about you;
- Categories of third parties to whom your personal information was sold or disclosed for a business purpose; and

- The business or commercial purpose for collecting or selling your personal information.

Your Right to Request Deletion of Personal Information We Have Collected About You

Upon your request, we will delete the applicant personal information we have collected about you, except for situations where the CCPA authorizes us to retain specific information, including when it is necessary for us to provide you with a good or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; or comply with or exercise rights provided by law. The law also permits us to retain specific information for our exclusively internal use, but only in ways that are compatible with the context in which you provided the information to us or that are reasonably aligned with your expectations based on your relationship with us. We will act on your deletion request within the timeframes set forth below.

Your Right to Correct Your Personal Information

You have the right to request that we correct applicant personal information we hold that you believe is not accurate. We will take steps to determine the accuracy of the applicant personal information that is the subject of your request to correct, and in doing so will consider the totality of the circumstances relating to the applicant personal information you have identified as being incorrect. We may ask that you provide documentation regarding your request to correct in order to assist us in evaluating the request.

Sale of Personal Information

As explained above, we do not sell your applicant personal information, nor do we knowingly employ or contract with minors under the age of 16 or sell the applicant personal information of such minors.

Exercising Your Rights and How We Will Respond

To exercise any of the rights above, or to ask a question, call us at 833-552-1772 or email recruiting@vantagerisk.com.

For requests for access, deletion, or correction, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will provide a substantive response to your request as soon as we can, and generally within 45 days from when we receive your request; although we may be allowed to take longer to process your request under certain circumstances. If we expect that your request will take us longer than normal to fulfill, we will let you know.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain

situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavor to provide you with an explanation as to why.

Our Commitment to Respect Your Rights

If you exercise any of the rights explained in this Privacy Notice, we will continue to treat you fairly and will not retaliate against you.

Verification of Identity – Access or Deletion Requests

We will ask you for identifying information and attempt to match it to information that we maintain about you.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to your request. We will notify you to explain the basis of the denial.

Authorized Agents

You may designate an agent to submit requests on your behalf.

If you would like to designate an agent to act on your behalf, the agent will be required to provide us with proof of the agent's identity and proof that you gave the agent signed permission to submit a request on your behalf. Additionally, you will be required to verify your identity by providing us with certain personal information as described above or provide us with written confirmation that you have authorized the agent to act on your behalf.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.