

MA LABORATORIES, INC.

California Employee Privacy Notice

Effective Date: September 9, 2024

The California Consumer Privacy Act as amended (“CCPA”) imposes specific obligations on businesses processing personal information of California residents. Pursuant to the CCPA, Ma Laboratories, Inc. and any of its affiliate companies (“Ma Labs”, “we” or “us”) is required to provide employees, job applicants, and independent contractors of Ma Labs who are California residents (“Ma Labs CA Staff” or “you”) a notice, used at or before the point of collection of such personal information, that identifies the categories of personal information that may be collected and why Ma Labs collects such information.

This California Employee Privacy Notice (“Notice”) is intended to provide Ma Labs CA Staff with the CCPA required notice.

Updates

This Notice will be updated at least once every twelve (12) months to reflect changes in our business, legal or regulatory obligations. Ma Labs will not collect additional categories of your personal information or use your personal information already collected for additional purposes without providing you with a notice of our intent to do so. Any changes to this Notice will be effective from the date they are communicated to you. If we make any material changes to this Notice, we will notify you by email, mail, Intranet posting, or other form of internal corporate written communications before such changes are effective at the current or last known email address or physical address that you have provided to us.

Scope

This Notice applies to all current and former Ma Labs CA Staff and describes the collection, use, and sharing of your information, as well as the choices and obligations you have with respect to your information. In this Notice, Ma Labs refers to Ma Labs and all Ma Labs affiliate companies located in the United States. This Notice does not supersede existing policies. Ma Labs reserves the right to change this Notice at any time.

Definitions

“Personal information” has the meaning as defined in the CCPA, and includes information that is collected by Ma Labs about you in the course of employment for employment related purposes and encompasses any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. It includes “sensitive personal information” about you which Ma Labs collects, which is personal information listed in the CCPA such as your social security number, your drivers license number, racial and ethnic origin, health information and other information as listed in the CCPA. It does not include publicly available information.

“Process”, “processed” or “processing” means any operation or set of operations which is performed on personal information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal information.

“You” or “Ma Labs CA Staff” means an identified or identifiable natural person who is a California resident and who is an employee of, a job applicant to, or an independent contractor of Ma Labs, or any of its affiliate companies. In this context “employee” refers to any person who is employed at Ma Labs as a full-or part-time employee or temporary worker, “job applicant” refers to any person who has submitted his or her candidacy to Ma Labs, and “independent contractor” means a natural person who provides any service to a business pursuant to a written contract.

What Are the Categories of Personal Information Collected?

We may collect or receive (and may have collected or received during the 12-month period prior to the Last Updated date of this Notice) the categories of personal information listed below. Not all categories will be collected for every individual.

- Personal identifiers, such as name and address etc.
- Device and online identifiers and related information, such as telephone number and email address etc.
- Internet, application, and network activity, such as cookie IDs and browser visits etc.
- Government identifiers, such as national identification numbers and driver’s license numbers etc.
- Demographic information, such as age and date of birth etc.
- Financial information, such as bank account and routing numbers etc.
- Health and health insurance information, such as health insurance identification numbers; health information requested by FMLA/CFRA, disabilities, COVID certification etc.
- Characteristics of protected classifications under state or federal law, such as gender and race etc.
- Location information, such as geo-location information etc.
- Visual and other sensory information, such as video recordings etc.
- Employment information, such as occupation, title, licenses, professional memberships, and telematics etc.
- Background and criminal information, such as background checks and criminal convictions consistent with applicable law; drug test information to the extent may be permitted by applicable law etc.
- Education information, such as degree and schooling information etc.

- Individual preferences and characteristics, such as information related to any assessment you may take as part of the interview screening process upon hire or during your tenure for promotional opportunities, reference checks etc.
- Emergency or family contact information

What Are the Categories of Sources from Which We Collect Your Personal Information?

We may obtain and combine personal information from different sources, as provided below:

- Provided directly by you or a member of your household
- Collected from a device associated with you or your household
- Collected through technology on company-owned property
- Collected from another company within Ma Labs or affiliate companies
- Collected from an external third-party source

Information Provided Directly by You or a Member of Your Household

Ma Labs collects personal information directly from you as part of your employment. For example, information that you give us when you fill out an employment application or enroll in benefits programs, or it can be information that you give us when you interact with services such as any Ma Labs internal websites or services or fill out your Ma Labs profile. We may also collect photographs or visual recordings on Ma Labs property, or during events and activities relating to your employment with Ma Labs.

Information Collected From a Device Associated With You or Your Household

We collect information from you automatically when you use certain websites Ma Labs operates for our staff, such as the Ma Labs Intranet. This information may not identify you directly. For example, we may collect IP address, browser, or operating system information, and referring website. Our websites may use cookies, which are small text files stored on your computer that help us to maintain your session or provide other interactive features. You can turn off cookies through your browser. However, turning off cookies may limit some functionality of the site, such as changing the layout of your personalized content. The site may also use web beacons, which allow us to know if you visited a certain page. Additionally, we collect information from you when you use company equipment, systems, and applications.

Information We Collect through Technology on Company-Owned Property

We may collect your personal information from technology we use in our corporate facilities, such as our facility cameras. We operate cameras on company property for security and operational purposes. Additionally, we collect telematics data in corporate vehicles. Telematics data involves the use of installed hardware to collect and transmit

data about a vehicle which may include the vehicle's location, use, and maintenance needs.

Information We Collect from Another Affiliate Company

We may collect your personal information from another corporate affiliate of Ma Labs such as Super Talent Technology Corporation, iMicro, Inc., IT Express Corporation, Eratronix, Inc., Flash Deal, Inc., and Quick Deal, Inc., and any other affiliate companies of Ma Labs.

Information Collected from External Third-Party Sources

We receive information about you from third party sources to assist us with employment-related activities, and other legal matters. For example, we may collect information from employment background agencies for the purpose of conducting a background check. Examples of the types of information contained in a background check may include your criminal, employment, and educational history, as well as information about your character, general reputation, personal characteristics, mode of living, and more. Before requesting a background check, Ma Labs will obtain your informed and specific consent by asking you to sign a Fair Credit Reporting Act Authorization and Disclosure Form.

What Are the Purposes for Collecting Personal Information?

We may use your personal information for the purposes provided below:

- To fulfill requests and obligations related to your employment
- To create and maintain records related to your employment
- To conduct auditing and monitoring of transactions and engagement
- To protect the security and integrity of our systems, processes and our business, and help prevent fraud
- To update our operational and technical functionality
- To conduct business analysis, such as analytics, projections, identifying areas for operational improvement
- To fulfill our legal function or obligations
- To conduct recruiting and hiring and for employment purposes
- To enroll to benefits

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

Employment Purposes

We will collect personal information about you or your dependents relating to your working relationship with Ma Labs. We will use the information for employment purposes and in the context of our employment relationship with you, such as recruiting and hiring, enrolling you in benefits and administering payroll, and for evaluation and training purposes.

- *Recruiting and Hiring* – We use your personal information to consider your skills, qualifications, and interests in connection with our employment opportunities; to communicate with you and inform you of career opportunities; to conduct background checks if you are offered a job; to improve our recruiting and hiring process.
- *Benefits* - We will use your information to enroll you, deliver, and communicate with you about the various benefit plans we offer. Ma Labs offers staff many different benefits and uses your information in different ways depending on the type of benefit program. For example:
 - *Health benefits* – Staff information such as date of hire, job classification, health and medical information about you and your dependents, and more, can be used to determine your eligibility for health benefits as well as to help you select and enroll in the benefits programs that are right for you and your family. If you choose to enroll in a healthcare plan offered by Ma Labs, it is important to note that your plan does not share your information collected in the course of your medical care with Ma Labs unless it is required or permitted by law. One example of this is compliance with the Affordable Care Act (ACA), which requires an employer to report that employees are enrolled in a healthcare plan, so the plan provider must share information necessary for Ma Labs to comply with ACA requirements, etc.
 - *Retirement benefits, such as 401(K) plan and related information* – for example, we will use information such as date of hire to determine your eligibility for retirement benefits etc.
- *Payroll* - We will use information you have provided, such as direct deposit or banking information, to administer payroll services etc.
- *Job Performance and Career Management* - We will use your information for the purposes of evaluating performance, managing job related training, building career-path development insights and tools, and optimizing job roles etc.
- *Incentive programs* – We may use your information when it is required to participate in tax and employment incentive programs offered by state and federal governments. In order to verify that a staff member qualifies Ma Labs for a tax or other incentive, Ma Labs may be required to submit personal information, including Social Security Numbers (or other such government identifiers), to the government entity or their service provider etc.
- *Legal purposes* – We may use your information to prepare any legal claim or defense necessary to protect the interests of Ma Labs, our staff, and our customers etc.

- *Investigative purposes* – We may use your information to conduct investigations related to company policies etc.

Disclosing Personal Information to Certain Third Parties

During the 12 month period prior to the last updated date of this Notice, we may have disclosed your personal information with certain categories of third parties as described in the sections below:

Sharing with Service Providers

From time to time, we may utilize service providers to administer certain programs, benefits, or administrative functions on behalf of Ma Labs. We require our service providers to keep your personal information confidential.

Sharing for Legal Requirements and Protection of Ma Labs and Others

We may share your personal information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of Ma Labs, our customers, our staff, or other persons.

Examples include:

- Protecting the health or safety of staff or customers
- Addressing crimes committed on Ma Labs property
- Identifying and addressing fraud or financial risk
- Providing personal information to law enforcement at their written request
- Responding to a search warrant or other valid legal inquiry

Categories of Personal Information We Disclose to Each Type of Third Party

We may disclose your personal information with certain categories of third parties, as described below.

Category of Personal Information Disclosed	Category of Third-Party Recipient
Visual and other sensory information	Local, state, or federal government entities
Identifiers	Service providers (such as benefits providers, payroll providers, etc.); Local, state, or federal government entities; Recruitment services; Court orders/legal productions/subpoenas

Background and Criminal Information	Recruitment services; Local, state, or federal government entities; Court orders/legal productions/subpoenas
Device Information and Online Activity	Service providers (analytics providers, etc.); Local, state, or federal government entities; Recruitment services; Court orders/legal productions/subpoenas
Financial Information	Service providers that receive data to provide services to a Ma Labs entity (e.g., payroll providers/services such as ADP, cloud storage providers, etc.); Recruitment services; Local, state, or federal government entities; Court orders/legal productions/subpoenas
Demographic Information	Service providers that receive data to provide services to a Ma Labs entity (e.g., cloud storage providers, etc.); Business partners; Recruitment services; Local, state, or federal government entities; Court orders/legal productions/subpoenas; benefits providers
Geolocation	Service providers that receive data to provide services to a Ma Labs entity (e.g. cloud storage providers, etc.); Local, state, or federal government entities; Court orders/legal productions/subpoenas
Family Information	Recruitment services; Local, state, or federal government entities; benefits providers
Education	Recruitment services; Local, state, or federal government entities
Health and Health Insurance Information	Recruitment services; Local, state, or federal government entities; benefits providers
Professional and Employment Information	Service providers (such as benefits providers, payroll providers, etc.); Recruitment services; Local, state, or federal government entities; Court orders/legal productions/subpoenas
Inferences	Recruitment services; Local, state, or federal government entities; Court orders/legal productions/subpoenas

Expenses and Purchases Information	Local, state, or federal government entities; ; Court orders/legal productions/subpoenas; benefits providers
Visa status	Local, state, or federal government entities; Court orders/legal productions/subpoenas; benefits providers

How Long Do We Retain Your Personal Information?

We will keep the personal information we collect about you for as long as necessary to carry out the purposes set forth in this Privacy Notice or any other notice provided at the time of data collection, but no longer than as required or permitted under applicable law or internal Ma Labs policy. We dispose of the information we collect in accordance with Ma Labs’s retention policies and procedures.

How Do We Secure Your Personal Information?

We recognize the importance of maintaining the security of your personal information. We use reasonable security measures including physical, administrative, and technical safeguards to protect your personal information. These measures may include physical and technical security access controls or other safeguards, information security technologies and policies, procedures to help ensure the appropriate disposal of information, and training programs. We have a team who are responsible for helping to protect the security of your information.

Sale or Share of Personal Information of Consumers under 16 Years of Age

Ma Labs does not knowingly sell or share (for cross-context behavioral advertising) the personal information of consumers under 16 years of age. For more information about treatment of children’s personal information, see the Ma Labs Privacy Notice.

Staff Choices for Communications

Staff may elect to receive certain communication relating to their employment through email, phone, text message, and/or physical mail. Teams that manage your information may communicate with you in various ways, so you may need to review your communications choices in several different places.

Monitoring and Protection

Cameras

To ensure the safety and security of our staff, customers, and assets, closed circuit television and cameras are used throughout Ma Labs facilities. These cameras are used for purposes such as safety and security, asset protection, operations improvement, and deterrence and investigation of misconduct. Cameras will only be used in areas where an individual has an expectation that the individual could be recorded.

Equipment and Systems

We have a reasonable interest in ensuring that company equipment and systems, as well as data, are protected and used properly. Accordingly, to the extent allowed by applicable law, we monitor or record any and all use of company equipment and systems, including use for personal purposes.

What Are Your California Privacy Rights?

As a California resident, you can make certain requests regarding your personal information, and we will fulfill each request to the extent required by law. If we are unable to comply with your request in whole or in part, we will notify you with reasons for the denial. We do not offer the option for you to request we stop selling your personal information or sharing it for cross-context behavioral advertising because we do not conduct such selling or sharing of our staff's personal information.

As stated in more detail below, you can request that we:

1. Provide you with access to a copy of and certain details regarding the personal information we have about you.
2. Delete your personal information.
3. Correct your inaccurate personal information.
4. Limit the use or disclosure of your sensitive personal information (SPI).

To exercise any of these privacy rights, please complete the form found here and email the completed form to sjhr@malabs.com.

1. Request to Access My Personal Information: You have the right to request access to the personal information we may have collected about you.

Requests to access your personal information may be submitted up to two times in a rolling twelve-month period. In response, we will return to you the following categories of information, to the extent required by law:

- The categories of personal information we have collected about you.
- The categories of sources from which we collect your personal information.
- The business or commercial purpose for collecting, selling, or sharing your personal information.
- The categories of third parties to whom we disclose personal information.
- The specific pieces of personal information we have collected about you.
- A list of categories of personal information that we have sold or shared for cross-context behavioral advertising, along with the categories of third parties we sold it to or shared it with for cross-context behavioral advertising.
- A list of categories of personal information that we have disclosed for a business purpose, along with the categories of third parties we disclosed it to.

2. Delete My Personal Information: You have the right to ask that we delete your personal information. Once we receive a request, we will delete the personal information (to the extent required by law) we hold about you as of the date of your request from our records and direct our service providers to do the same. Choosing to delete your personal information may impact your ability to use our websites and online features.

3. Correct My Personal Information: You have the right to ask that we correct the personal information we may have collected about you if that information is inaccurate. We reserve the right to request identifying documentation from you in certain circumstances, as permitted by law.

4. Limit the Use and Disclosure of Sensitive Personal Information: You have the right to ask that we limit our use and disclosure of your Sensitive Personal Information to certain purposes permitted by law.

We will not discriminate against you for exercising your rights.

How Do We Verify Your Identity to Complete Your Access, Correction and Deletion Requests:

If you request access to, or the correction or deletion of, your personal information we will verify your identity before disclosing the requested information. To do so, we may ask that you log into your Ma Labs staff account or provide us with your:

- First name*, Middle initial, Last name*
- Address*
- Email address
- Phone number

**Required field*

What If We Can't Verify Your Identity?

If we can't verify your identity, we will notify you, and your request(s) to access, request, or delete your personal information may not be processed. Any requests may be denied if we have reason to believe they are fraudulent.

How Do I Submit a Request Using an Authorized Agent?

If you'd like an authorized agent to exercise your rights for you, they may email us at sjhr@malabs.com to submit requests on your behalf together with supporting documentation. We require documentation demonstrating your agent's authority to submit requests on your behalf. For example, a valid power of attorney or other documentation, including a letter, signed by you (the California resident) authorizing the agent to submit your requests.

Contact our HR Team or write to Ma Labs Privacy Office with any questions or comments about this Notice or about how we handle your personal information. The HR Team's email address is sjhr@malabs.com and the mailing address is:

Ma Laboratories, Inc.
Attn: Human Resources Privacy Office
2075 N. Capitol Ave.
San Jose, CA 95132

Contacts for Questions and Concerns Regarding This Notice

You may discuss questions or concerns about this Notice with your management team or your HR Team.

Additional Resources

For current staff, please access the Policies page on Ma Labs intranet for additional information.

This Notice does not create an express or implied contract of employment or any other contractual commitment. Ma Labs may modify this Notice at its sole discretion without notice, at any time, consistent with applicable law. Employment with Ma Labs is on an at-will basis, which means that either Ma Labs or the staff member is free to terminate the employment relationship at any time for any or no reason, consistent with applicable law.