



# Privacy Notice to California Employees

Effective date: January 1, 2023

## 1. Scope of This Notice

This notice is for California residents who are employed at Toyon Research Corporation (“Toyon,” “us,” or “we”), whether as an employee or independent contractor). It describes how Toyon may collect, use and disclose your Personal Information in connection with your employment. It also explains related rights, and how you can exercise them, under the California Consumer Privacy Act of 2018, as amended (the “CCPA”). The CCPA broadly defines a “consumer” as a resident of California.

(You can read our general Privacy Policy [here](#). The Privacy Policy describes how we may collect, use and disclose your Personal Information if you interact with us outside of your capacity as an employee.)

When we say “Personal Information,” we mean information that can reasonably be linked to a particular individual or their household. Generally speaking, your Personal Information includes your unique identifiers (full name, phone number, email address, user name, etc.), and information about your characteristics, conditions or behavior that is associated with one of your identifiers or could otherwise reasonably be linked to you. “Non-Personal Information,” on the other hand, has been anonymized, aggregated or de-identified such that it cannot reasonably be linked to a particular individual or their household.

Personal Information does not include the contents of electronic communications that you send or receive, or information that you generate, using an account or resources supplied by Toyon for work purposes, or information that the CCPA excludes from its definition of Personal Information.

Note: Many of our customers are government agencies that require our employees to undergo government background checks. You may be required to undergo such a background check as a condition of your employment or continued employment at Toyon. This notice does not apply to Personal Information collected in connection with a government agency background check, which is governed by federal regulations or other applicable laws.

## 2. Employee Personal Information We Collect and How We Collect It

### Categories Collected

- **Identifiers**, such as your full name, signature, home address, phone number, email address, IP address, unique device identifier
- **Demographic Information**, such as your age, gender, date of birth, race, ethnic origin, current and past citizenship status, marital status, disability and veteran or military status. Demographic information may include legally protected classifications.
- **Emergency Contact Information**, such as your emergency contact's full name, nature of relationship with you, address, phone number, e-mail address
- **Financial Information**, such as bank account number
- **Biometric Information**
- **Geolocation Data**, such as your approximate location when you access our corporate network
- **Internet or Network Activity**, such as data about your use of computer systems, software, networks or connected devices owned or controlled by Toyon
- **Sensitive Personal Information** (as defined in the CCPA), including social security, driver's license, state ID or passport number; your precise geolocation when you access our corporate network; racial or ethnic origin; medical or health insurance information

## Sources and Methods of Collection

We may collect Personal Information from you when you provide it for employee onboarding, payroll and benefits processing, or other employment related purposes. We may also collect Personal Information via automatic means, such as Internet or Network Activity when you use our corporate network. We may also receive Personal Information from third parties, with your consent or where required by law; or from public sources such as public social media platforms.

## 3. How We Use Employee Personal Information

We may use your Personal Information for the following purposes:

- To establish your user account and scope of access to Toyon's corporate network
- To process payroll and other forms of compensation
- To provide insurance and other benefits to you or your dependents
- To determine benefit levels and eligibility
- To enhance workplace health and safety
- To enforce workplace policies
- To make reasonable accommodations for a disability
- To process requests for medical or family leave
- To reimburse business expenses
- To pay professional dues or other expenses on your behalf

- To protect Toyon’s office space, computer network and information assets against unauthorized access
- To communicate with you about compensation or other issues related to your employment
- To comply with applicable laws and protect Toyon’s legal rights
- In any other way we may describe when we collect the information; and
- For any other purpose with your consent.

We may use Non-Personal Information for any purpose.

## **4. Data Retention**

Typically, we retain employee Personal Information for the period necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes.

## **5. Sale, Sharing or Disclosure of Employee Personal Information**

Under the CCPA, you can request to opt-out of the “Sale” of your Personal Information—which the CCPA defines very broadly to include some transactions or arrangements that do not involve the exchange of data for money—and the “Sharing” of your personal information, which the CCPA defines as sharing with third parties for purposes of cross-site targeted advertising. We don’t Sell or Share employee Personal Information.

Within the past 12 months, we disclosed the categories of Personal Information collected, for a business purpose, to our service providers, who provide services to us such as data storage and transmission, payroll processing and benefits administration, among other things.

In addition to disclosing your Personal Information to service providers, we may disclose your Personal Information in the following contexts:

### **Mandatory Disclosures and Legal Proceedings**

We may have a legal obligation to disclose Personal Information to government authorities or other third parties pursuant to a valid regulatory request, subpoena or court order. We may also need to disclose and otherwise process your Personal Information in accordance with applicable law to prevent physical harm or financial loss, protect the vital interests of a person, enforce our various policies, protect our property, services and legal rights, prevent fraud, support auditing, compliance and corporate governance functions, or comply with applicable law.

### **Change in Control or Merger**

We may transfer your information in the event of the sale of substantially all of the assets of our business to a third-party or in the event of a corporate merger, consolidation, acquisition or reorganization. However, in such event, any acquirer will be subject to the provisions of our commitments to you or we will not disclose your information.

### **With Your Direction or Consent**

We will share your Personal Information with other third parties as you may direct or otherwise consent.

## **6. Your Rights and How to Exercise them with Toyon**

[Click here \(Link to CA Privacy Rights PDF\)](#)

## **7. Changes to This Notice**

We reserve the right to update or change this Notice or our Privacy Policy at any time and you should check them periodically. If we make any material changes, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

## **8. Contact Us**

If you have any questions or concerns about this Notice, please contact us via [privacy@toyon.com](mailto:privacy@toyon.com).