

Notice of Privacy Practices to California Resident Job Applicants

Date: October 10, 2023

This is an overview of privacy practices of Bristlecone, Inc., 10 Almaden Blvd., Suite 990, San Jose, CA 95113 USA (hereinafter the "**Company**," "**we**," "**us**," or "**our**") regarding job applicants for employment at our Company who are California residents. This notice describes the collection and management of personal information (hereinafter "**Personal Information**") from job applicants. It also covers how that personal information will be collected, stored, processed, and used. Finally, it describes rights afforded by California privacy law.

Our employees receive a Notice of Workplace Privacy Practices when they begin their employment with Bristlecone. The terms of that notice will apply if you become an employee of Bristlecone and, in that case, its terms will take the place of the terms of this notice.

In 2018, the State of California enacted the California Consumer Privacy Act (CCPA). In 2020, California's voters supplemented CCPA with the California Privacy Rights Act (CPRA). This notice assists in our compliance program for CCPA, CPRA, and other applicable privacy laws.

I. CONTACT FOR PRIVACY QUESTIONS OR COMPLAINTS

Please direct any questions or complaints about this notice or the Company's privacy practices to:

Mr. Padam Pandit, CFO

10 Almaden Blvd, Suite #990, San Jose, CA 95113

Privacy@bristlecone.com

II. PERSONAL INFORMATION WE COLLECT AND PURPOSES OF USE

We will not collect personal information from job applicants other than the personal information described in this Section II without first informing them and giving them the opportunity to object to such collection, unless applicable law requires or permits us to collect that personal information. Nonetheless, if we do not have sufficient personal information to evaluate a job application and to possibly hire the job applicant as an employee, the Company may have no choice but to not accept the job application.

We require that our job applicants be adults. We do not collect personal information from minors.

1. SUMMARY OF PERSONAL INFORMATION COLLECTED AND USED

As a business with operations in California, we collect a variety of categories of personal information from job applicants and the service provider giving us background checking information. The table below summarizes the categories of personal information we collect and the business purposes for which the categories of personal information will be used. Unless you submitted another job application in the previous 12 months, the only personal information we have collected from you in the previous 12 months is the information on your job application shown in the table below and related documentation you have provided to us with the job application.

Categories of Personal Information	Purposes of Use
“Identifiers” such as a real name, alias, postal address, telephone number or other unique personal identifier, email address, social security number, driver’s license number, passport number, state identification card, or other similar identifiers.	We collect and use job applicants’ names, postal addresses, telephone number, email addresses, and identification credentials (such as a passport, driver’s license, or state identification card) to identify job applicants and manage their job applications. Email addresses are used as account names when job applicants apply for jobs online. We collect contact information of job applicants’ references and past supervisors for purposes of checking job applicants’ prior work and educational histories.

Categories of Personal Information	Purposes of Use	
<p>Information (other than Identifiers already described above) that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to:</p>	<p>Signature</p>	<p>We collect signatures from job applicants on job applications they complete and any signed documents they submit with their job application, such as a cover letter. The purpose of collecting signatures is to show the assent of job applicants to the job application and related documentation.</p>
	<p>Education, employment, and employment history</p>	<p>We collect information about job applicants' education, employment, and employment history. We may collect resumes and cover letters. We use such information to evaluate the applications of such job applicants for employment.</p>
	<p>Criminal and background checking information</p>	<p>Once an offer is made, the offer is subject to satisfactory completion of a comprehensive background check. We obtain background checking information from a third-party service provider, subject to applicable law, which may include information about any criminal records about your background. For roles related to finance or senior executives, we may also conduct a check of your credit history. Note: We do not have access to personal information that you provide to our background checking service provider until a report summarizing any results of the background check is provided to us. Our service provider has its own privacy policy concerning the personal information you provide to it, and you have certain privacy rights under federal and state law disclosed in its privacy policy and its disclosures to you.</p>
	<p>Medical information</p>	<p>If a job applicant will be working as a Bristlecone consultant for a customer that requires a drug or alcohol test as a condition of conducting work at the customer's location, we may require you to undertake a drug or alcohol test and collect the results of</p>

Categories of Personal Information	Purposes of Use
	such testing, subject to applicable law. We will use such information to enable the job applicant to work at the requesting customer’s location. If we request a drug or alcohol test, we will provide an additional privacy notice to you at that time specific to the testing procedure.
Characteristics of protected classifications under California or federal law.	<p>If you provide it, we may receive information from you about characteristics of certain protected classification for purposes of data for diversity monitoring, where the collection of such data is allowed by law (e.g., race, ethnicity, and gender). We are also required by federal law to collect and report race/ethnicity and gender to the Equal Employment Opportunity Commission by job category.</p> <p>We only collect such information after a person has been hired as an employee. Please note: providing such information to Bristlecone is strictly voluntary.</p>
Internet or other electronic network activity information, including, but not limited to, information regarding a job applicant’s interaction with an Internet Web site, application, or advertisement.	Job applicants may complete a job application on a hosted website and provide us with information described above. Also, job applicants may send us emails, text messages, and other electronic communications. If we receive such electronic information from job applicants, we will use it for evaluating and managing their applications for employment. We also may collect publicly available information from websites or social media, including information that you choose to voluntarily submit to us in connection with your application.
Geolocation Data	We collect postal addresses and telephone numbers from job applicants, which usually

Categories of Personal Information	Purposes of Use
	show the residence locations of job applicants.
Professional or employment-related information.	We collect information about job applicants' professional and employment history and goals. We use such information to evaluate the applications of such job applicants for employment.
Education information	We may collect educational transcripts from any job candidates for which we may need to file for a work permit with the U.S. Citizenship and Immigration Services. We may provide that transcript to an immigration law firm to assist with the work permitting process. See Section III(2) below.
Inferences drawn from education, employment, employment history, and professional or employment-related information relating to candidates' characteristics, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	We may collect this information in connection with notes taken in the job application process or in interviews. This information is collected for the purpose of assessing a job applicant's application for employment.

If we collect your personal information for purposes covered in this policy and seek to use the personal information for a different purpose not covered by this policy, we will notify you and, where required, seek additional consent to use personal information for the other purpose

2. FURTHER DISCLOSURES REGARDING PURPOSES FOR USE OF PERSONAL INFORMATION WE COLLECT

Employment, employment history, professional, and employment-related information categories of personal information (“Employment History”) include, but are not limited to salary history, work and compensation history, planned salary, earnings, career development, performance history information (including performance appraisals from

references), work restrictions and accommodations requested, decisions to offer work, resumes, job applications, employment references and background checking and verification information. Employment History also includes a job applicant's past work performance.

When job applicants apply for positions using a job application or our website, we collect Identifiers from candidates to process their applications. We may collect and review educational background and Employment History to consider a job applicant for a position and, where necessary, to facilitate obtaining a work permit for job candidates with visa requirements. Notes of interviews for positions may include inferences drawn from education and Employment History relating to job applicants' characteristics, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. We may check employment references and background checking and verification information in the process of hiring potential job candidates.

III. DISCLOSURE OF PERSONAL INFORMATION

We maintain your job application file as part of our confidential records and allow access to such files only on a "need to know" basis by authorized personnel. Except for the disclosures for business purposes listed below, the Company will not sell, distribute, transfer, or lease your personal information to third parties. The Company has not sold your personal information in the last 12 months.

1. BRISTLECONE GROUP COMPANIES

The Company may transmit personal information about job applicants in the form of master data, contact information, and employment contract data for storage in a human resources management system and for processing and use of such personal information by various Bristlecone Group Companies for the purpose of potentially hiring job candidates and managing the job application process.

2. VENDORS AND SERVICE PROVIDERS

We may share your personal information with vendors or outsource service providers that help us provide information processing facilities needed to process job applicant information. For instance, we may provide additional personal information to service providers concerning criminal background checking to obtain a complete understanding of your background. We will require any such vendors or service providers to manage your personal information with privacy and security safeguards consistent with this privacy notice.

If a job candidate has visa requirements and Bristlecone must assist with an application for a work permit, we may provide personal information to an immigration law firm assisting Bristlecone job candidates. The immigration law firm will also collect additional personal information directly from the job candidate. The immigration law firm's privacy practices are governed by its own privacy practices. Please review its privacy policy to understand the immigration law firm's privacy practices.

3. CERTAIN CUSTOMERS

If a job applicant will be working as a Bristlecone consultant for a customer that requires a drug or alcohol test as a condition of conducting work at the customer's location, we may require you to undertake a drug or alcohol test and collect the results of such testing, subject to applicable law. We may share the results of testing with the customer to show that you are not misusing drugs or alcohol before having you perform work at the customer's location.

4. LEGAL OR REGULATORY PURPOSES; INVESTIGATIONS

From time to time, we may be required to respond to a subpoena, court order, search warrant, administrative or judicial process, requests by law enforcement agencies, or other requests that we must respond to under applicable law. We may disclose your personal information in response to any of these requirements. Also, we may disclose your personal information to preserve the security of our business information or information processing facilities, resolve disputes, or to investigate any possible wrongdoing.

5. DISCLOSURE IN CONNECTION WITH CORPORATE TRANSACTIONS

We may share or transfer personal information about you in connection with a merger, acquisition, reorganization, or sale of assets of our business, in the event of bankruptcy, or during the negotiations leading to such an event. We will seek assurances from any buyer that your personal information will be used, shared, maintained, and disclosed consistent with the terms of this privacy notice.

IV. SECURITY OF PERSONAL INFORMATION

We are committed to ensuring that your personal information is secure. In order to prevent unauthorized access or disclosure, we have put in place industry standard administrative, physical, and technical safeguards to secure the personal information we collect. The purpose of these safeguards is to protect personal information against loss, misuse, unauthorized access, theft, modification, or unauthorized disclosure or destruction. Access to personal information is allowed only on a “need to know” basis by authorized personnel.

V. DURATION OF DATA STORAGE

We retain personal information only as long as it is needed for considering your job application. If you are not offered employment, our policy is to destroy job applications after 18 months after action is taken on the job application.

If you become an employee, we will transfer information from your job application file to your employee personnel file. Retention of information in your employee personnel file would then be governed by our Notice of Workplace Privacy Practices.

In addition, the Company is subject to various documentation and preservation obligations under applicable law. The Company will maintain those records containing personal information for the time that the Company must preserve them under applicable law.

VI. ACCESS AND INDIVIDUAL RIGHTS AND YOUR RIGHTS UNDER CALIFORNIA PRIVACY LAW

Applicable law may afford job applicants access to documents they sign under certain terms and conditions. Bristlecone will employ reasonable means to keep personal information described in this notice accurate, complete, up-to-date and reliable for its intended use. If the Company does not provide a job applicant access to certain personal information, it will give specific reasons for refusing to do so and provide a contact point for further inquiries.

If you wish to access or correct any personal information we have collected about you, or have any question or dispute concerning our privacy practices, please contact the representative listed in Section I.

Also, California's privacy laws give individual rights to California residents, which are described below. Our obligation to afford you these rights or provide notifications to you, however, are subject to any contrary laws, rules, or law enforcement demands. If you wish to exercise any of the rights of California residents set out below, please contact us using the contact information in Section I.

1. RIGHT OF ACCESS

You have the right to request that we disclose certain information about our collection and use of personal information over the past 12 months, including the categories of personal information we collected from you, the sources of the personal information collected, our business purpose for collecting the personal information, the categories of third parties with whom we share your personal information, and the specific pieces of personal information collected from you.

2. RIGHT OF DELETION

You have the right to update or correct personal information about you in our records within the limits described below.

We will employ reasonable means to keep personal information described in this notice accurate, complete, up-to-date and reliable for its intended use. Bristlecone, however, may not give candidates the ability to review personal information where the burden or expense

of doing so is disproportionate to the risks to their privacy or benefits to them in a particular case. If Bristlecone does not provide a candidate access to certain personal information, it will give specific reasons for refusing to do so and provide a contact point for further inquiries

With limited exceptions, candidates will be permitted to review and, where inaccurate, correct personal information. Bristlecone will amend personal information as requested by a candidate or, where Bristlecone considers the personal information to be accurate, Bristlecone will include in the candidate's file the alternative text that the candidate believes to be appropriate alongside the original information. If it is determined that personal information is inaccurate or out of date, Bristlecone will use reasonable efforts to inform relevant third parties in possession of inaccurate personal information.

Please be aware that applicable law may permit or require Bristlecone to preserve some of your personal information as it is presently stored in our systems .

3. RIGHT OF DELETION

If you wish for Bristlecone to delete your personal information, please contact us. Please be aware that applicable law may permit or require Bristlecone to retain some of your personal information.

4. VERIFICATION OF REQUESTS TO EXERCISE INDIVIDUAL RIGHTS

For any request for individual rights of access or deletion, we will verify the identity of the requesting party before acting on the request. Please contact us if you are an agent or conservator of a California resident seeking to exercise the resident's rights under this section.

5. POLICY AGAINST DISCRIMINATION

By policy, Bristlecone does not discriminate against any California resident simply because the resident exercises any privacy rights available under California law.

VII. PRIVACY COMPLAINTS

If you have a complaint, please provide information relevant to your complaint to the representative listed in Section I. Our privacy team will evaluate your complaint based on the information you provide and send you a response. We may need to ask you for additional information to evaluate your complaint. We will promptly investigate and respond to your communications about a complaint. You may have other rights under law and the right to contact an appropriate regulator in the State of California or in your local jurisdiction.

VIII. AMENDMENTS TO THIS NOTICE

From time to time, Bristlecone may update or amend this notice. If we make an update or amendment to this notice, we will provide a copy of the amended notice to you.