



A Leader in Managed IT, Multi-Cloud and Cybersecurity Services for the Global Financial Services Industry

Abacus Group CPRA Employee Contractor Privacy Notice

Last Updated: 26 August 2024

This Privacy Notice applies to the personal information of employees, contractors, managing members, directors, and officers (“consumers” or “you”) of Abacus Information Technology, LLC d/b/a Abacus Group, LLC and GoVanguard NJ LLC (doing business as Gotham Security) (collectively, “Abacus,” “we,” “us,” or “our”) that are residents of the state of California (the “CPRA Notice”). Abacus will collect, disclose, and otherwise process your personal information for purposes of employment, human resources, benefits administration, health and safety, and other business-related purposes, and to comply with applicable laws and regulations. If you reside outside the State of California, this CPRA Notice does not apply to you. Capitalized terms not defined in this CPRA Notice shall have the meaning set forth in the CPRA.

1. The Personal Information We Collect, Why We Collect it, and How Long We Keep it

We will not sell or share (as defined in the CPRA) the personal information we collect in connection with your employment.

We may collect the categories of personal information (including sensitive information) listed in the tables below for the specific business purposes listed next to them.

Abacus determines the retention periods of each category of personal information based on the following criteria:

- The purposes for which Abacus processes the personal information (Abacus needs to retain the data as long as necessary for such purposes); and
- Tax, legal and regulatory obligations and requirements (laws or regulation may set, or recommend, a minimum period for retention of your personal information).

Sensitive personal information is a subtype of personal information consisting of specific information categories. While we collect information that falls within the sensitive personal information categories under the CPRA, we do not process it for the purpose of inferring characteristics about you and, therefore, you do not have the right to limit how we use and disclose such information.

Personal Information Category	Business Purpose
<p>Identifiers, such as your full name, gender, date of birth, signature, home address, telephone numbers, email addresses, and emergency contact information, as well as similar information for your dependents and beneficiaries</p>	<ul style="list-style-type: none"> • Conduct employee/contractor onboarding • Maintain and administer timekeeping, payroll, expense reports, employee training and development, and employee benefit plans, including enrollment and claims handling • Maintain personnel records (including job performance, goals and performance reviews, promotions, discipline, and termination), and comply with record retention requirements • Provide employees with human resources management services, employee data maintenance and support services,

Personal Information Category	Business Purpose
	<p>and, as applicable, the creation, maintenance, and security of your online employee accounts</p> <ul style="list-style-type: none"> • Communicate with employees/contractors and their emergency contacts and plan beneficiaries • Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws • Manage and monitor employee/contractor access to or use of Abacus facilities, properties, equipment, systems (including information systems), electronic devices, network, and data • Ensure productivity and adherence to Abacus policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of Abacus policies • Engage in corporate transactions requiring review of employee/contractor records, such as for evaluating potential mergers and acquisitions involving Abacus • Maintain commercial insurance policies and coverage, such as for workers compensation and other liability insurance • Perform workforce analytics, data analytics and benchmarking • Administer and maintain Abacus operations, including for safety purposes • Comply with applicable laws and regulations • Respond to law enforcement requests and as required by applicable law or court order
<p>California Customer Records employment and personal information, such as your name, signature, Social Security number, physical characteristics or description, photograph, address, telephone numbers, passport number, driver's license or state identification card number, immigration status, insurance policy number, education, current employment, employment history, membership in professional organizations, licenses and certifications, bank account number, credit card number, debit card number, or any other financial, medical or health insurance information</p>	<ul style="list-style-type: none"> • Same business purposes as for Identifiers (see above)

Personal Information Category	Business Purpose
<p>Protected classification characteristics under California or federal law, such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, reproductive health decision making, military and veteran status, or genetic information (including familial genetic information)</p>	<ul style="list-style-type: none"> • Comply with federal and state equal employment opportunity laws • Design, implement, and promote Abacus’s diversity and inclusion programs • Perform workforce analytics, data analytics, and benchmarking • Conduct internal audits, grievances, and suspected violations of Abacus policies • Exercise or defend the legal rights of Abacus, its employees, customers, contractors, and agents
<p>Professional or employment-related information, such as employment application information (work history, academic and professional qualifications, educational records, references, and interview notes, background check, drug testing results, work authorization, performance and disciplinary records, salary, bonus, commission, and other similar compensation data, benefit plan enrollment, participation, and claims information, leave of absence information including religious, military and family obligations, health data concerning employee and their family members</p>	<ul style="list-style-type: none"> • Design and administer employee benefit plans and programs, including for leaves of absence • Maintain personnel records and comply with record retention requirements • Communicate with employees/contractors and their emergency contacts and plan beneficiaries • Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws • Prevent unauthorized access to or use of Abacus’s property, including its information systems, electronic devices, network, and data • Ensure productivity and adherence to Abacus policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of Abacus policies • Evaluate and provide feedback about job performance, facilitate better working relationships, and for employee professional development • Exercise or defend the legal rights of Abacus, its employees, customers, and agents
<p>Non-public educational information, such as academic and professional qualifications, educational records, references, degrees and vocational certifications obtained, report cards, and transcripts</p>	<ul style="list-style-type: none"> • Evaluate an individual's appropriateness for promotion or transfer to a new position at Abacus

Personal Information Category	Business Purpose
Complete account access credentials , such as usernames or account details, combined with required access/security code or password	<ul style="list-style-type: none"> • Provide employees with human resources management services and employee data maintenance and support services • Prevent unauthorized access to or use of Abacus’s property, including its information systems, electronic devices, network, and data • Ensure productivity and adherence to Abacus policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of Abacus policies
Racial or Ethnic Origin	<ul style="list-style-type: none"> • Comply with federal and state equal employment opportunity laws • Design, implement, and promote Abacus's diversity and inclusion programs • Perform workforce analytics, data analytics, and benchmarking • Conduct internal audits and investigate complaints, grievances, and suspected violations of Abacus policies
Personal information collected and analyzed concerning your health , including health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, and health insurance policy information	<ul style="list-style-type: none"> • Investigate and process workers' compensation claims • Process health insurance claims • Ensure equal access to retirement programs and fertility planning by same-sex spouses • Ensure equal family leave policies and insurance for transgender surgeries
Precise geolocation data	<ul style="list-style-type: none"> • Prevent unauthorized access to or use of Abacus’s property, including its information systems, electronic devices, network, and data • Ensure productivity and adherence to Abacus policies • Conduct internal audits and investigate complaints, grievances, and suspected violations of Abacus policies
Biometric information	<ul style="list-style-type: none"> • Prevent unauthorized access to or use of Abacus’s property, including its information systems, electronic devices, network, and data

2. How We Obtain Your Personal Information

We receive your personal information mostly directly from you, but may also receive it from the following categories of sources:

- Publicly available sources;
- Your references;
- Companies that conduct background checks, screen for know your customer (KYC), anti-money laundering (AML), and/or other factors;
- Current and former employers, colleagues, customers, clients, or other professional contacts; and
- Security cameras, time clocks, phone logs, GPS systems on company vehicles, and similar technology.

3. What Kind of Personal Information We Disclose to Others

We may disclose the following categories of personal information to the following categories of service providers and/or contractors for a business purpose. We do not disclose your personal information to others who are not our service providers or contractors.

Personal Information Category	Category of Third Parties
<ul style="list-style-type: none"> • Identifiers • California Customer Records employment and personal information • Protected classification characteristics under California or federal law • Commercial information • Professional or employment-related information • Personal information collected and analyzed concerning your health • Non-public education information • Information related to immigration status • Complete account access credentials • Financial information 	<ul style="list-style-type: none"> • Companies that conduct background checks, screen for KYC, AML, and/or other factors • Payroll Providers • Law firms, accountants, and other providers of professional services
<ul style="list-style-type: none"> • Identifiers • California Customer Records employment and personal information • Protected classification characteristics under California or federal law • Personal information collected and analyzed concerning your health • Professional or employment-related information • Information of dependents or other individuals 	<ul style="list-style-type: none"> • Insurance companies (e.g., Ease and Empire Blue Cross Blue Shield, Guardian, Principal, Justworks, and Aetna)
<ul style="list-style-type: none"> • Identifiers • Protected classification characteristics under California or federal law • Commercial information • Professional or employment-related information • Information of dependents or other individuals 	<ul style="list-style-type: none"> • Retirement plans • Loan providers
<ul style="list-style-type: none"> • All categories of personal information mentioned above 	<ul style="list-style-type: none"> • Service Providers that provide internal auditing services, workforce analytics, data analytics and/or benchmarking services • Data storage companies including cloud providers

4. Your Privacy Rights

You have the following rights regarding your personal information:

- **Right to Know:** You have the right to know:
 - The categories of specific personal information we collect, use, disclose, sell, and/or share; and
 - The specific pieces of personal information we have collected from or about you.
- **Right to Delete:** You have the right to request deletion of your personal information. We will honor such request, but might not be able to fulfill your request if we (or our service providers) are required to retain your personal information.
- **Right to Correct:** You have the right to request that we correct inaccurate personal information about you. We will honor such request, but might not be able to fulfill your request if it is impossible to do so or would involve disproportionate effort, or if we have a good-faith, reasonable, and documented belief that a request to correct is fraudulent or abusive.
- **Right to Opt-Out of the Sale or Sharing of Personal Information:** You have the right to opt-out of the “sale” or “sharing” of your personal information. Please note, however, that we do not “sell” or “share” the personal information of our job applicants or employees as those terms are defined under the CPRA.
- **Anti-Retaliation Right:** We are prohibited from discriminating against you for exercising any of the above rights.
- **Right to Designate an Authorized Agent:** If you submit a request to know or delete your personal information through the use of an authorized agent, we may require that you (i) provide the authorized agent written permission to act on your behalf, and (ii) verify their identity directly with us.

5. Exercising Your Privacy Rights

To exercise the rights described above, please submit a request to us by using the methods outlined below.

In order to fulfill your request, we may need you to (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information related to you.

We will confirm receipt of your request within then (10) business days of its receipt, and endeavor to respond within forty-five (45) calendar days of its receipt. If we require more time, we will notify you of the extension and provide an explanation of the reason for the extension in writing, and we will provide you with a response no later than ninety (90) calendar days of receipt of the request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We may charge a reasonable fee to process or respond to your requests if they are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for this decision and provide you with a cost estimate before completing your request.

6. Updates

This CPRA Notice is effective as of the date of the “Last Update” stated at the top of this CPRA Notice. We may change this CPRA Notice from time to time with or without notice to you. By engaging or interacting with us after we make any such changes to this CPRA Notice, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, and without prejudice to the foregoing, our use of your personal information is governed by the CPRA Notice in current effect. Please refer back to this CPRA Notice on a regular basis.

7. How to Contact Us

If you have any questions about this CPRA Notice or need to access this CPRA Notice in an alternative format due to having a disability, please contact us at PrivacyPolicy@AbacusGroupLLC.com or US +1 (866) 997-3999 or UK +44 (0) 20 7936 1799.