



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

Privacy Notice for California Residents Pursuant to the California Privacy Rights Act (CPRA) (Job Applicants)

Last Updated: 26 August 2024

This Privacy Notice applies to the Personal Information of job applicants (“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 evaluating your application and related human resources functions, and if a job offer is extended and accepted, for additional employment, benefits administration, health and safety, and other business-related purposes, and in all cases 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. Personal Information Collected and Retention Periods

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

To view our website privacy policy, please visit [Privacy Policy | Abacus Group \(abacusgroup.com\)](https://abacusgroup.com/privacy-policy).

Personal Information Category	Business Purpose
Identifiers, such as your full name, gender, date of birth, signature, home address, telephone numbers, and email address	<ul style="list-style-type: none"> • Recruit and process employment applications, including verifying eligibility for employment and conducting background and related checks • Comply with applicable state and federal labor, employment, tax, benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws • Conduct internal audits and investigate complaints, grievances, and suspected violations of Abacus policies

Personal Information Category	Business Purpose
	<ul style="list-style-type: none"> • 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)
<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,</p>	<ul style="list-style-type: none"> • Recruit and process employment applications, including verifying eligibility for employment, background checks, and onboarding

Personal Information Category	Business Purpose
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	<ul style="list-style-type: none"> • 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 • Exercise or defend the legal rights of Abacus, its employees, customers, and agents
Non-public educational information , such as academic and professional qualifications, educational records, references, degrees and vocational certifications obtained, report cards, and transcripts	<ul style="list-style-type: none"> • Evaluate an individual's appropriateness for hire, or promotion or transfer to a new position at Abacus
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
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
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;
- Third party HR providers; 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.

1. Personal Information Category	2. Category of Third Parties
<ul style="list-style-type: none"> • Identifiers • 	<ul style="list-style-type: none"> • Companies that conduct background checks, screen for KYC, AML, and/or other factors
<ul style="list-style-type: none"> • Identifiers • California Customer Records employment and personal information • Protected classification characteristics under California or federal law • Professional or employment-related information • Non-public education information 	<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.

6. 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.

7. Updates

This CPRA Notice is effective as of the date of the “Last Update” stated at the top of this 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.

8. 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 PrivacyPolicy@AbacusGroupLLC.com or US +1 (866) 997-3999 or UK +44 (0) 20 7936 1799.