



## Privacy Notice for Employment Applicants Residing in California

Updated as of: January 1, 2020

Headway Technologies, Inc. (“HWT”) is concerned about privacy and wants you to be familiar with how we collect, use and disclose your personal information.

This Privacy Notice (“Privacy Notice”) applies solely to current and former applicants for employment at HWT who reside in the State of California. HWT has adopted this Privacy Notice to comply with the California Consumer Privacy Act of 2018 (the “CCPA”). Any terms defined in the CCPA have the same meaning in this Privacy Notice.

### PERSONAL INFORMATION WE COLLECT

**When Viewing Job Listings In Our Career Center:** We do not require that you create a login ID or provide personal information in order to review job listings. We may collect personal information such as usage and interaction data, IP addresses, online identifiers, and cookies from our online career sites and applications.

**When Applying For A Job Opening:** When you apply for a job at HWT, we may, either directly or through third parties, collect the following personal information:

- Contact information (name, phone, current and former addresses, email)
- Educational background, degrees, and certifications
- Professional experience and work history
- Professional certifications and qualifications
- Professional references
- Compensation expectations
- Marital status
- Job openings of interest
- Source of information concerning job openings
- Gender, race, and ethnicity information
- Birthplace and national origin
- Work authorization status and sponsorship information
- Veteran status
- Medical and health information, disabilities, and necessary accommodations
- Geo-location data
- Willingness to travel or relocate
- Background check information (investigative consumer report) from service providers which may include criminal history, credit history and driving records (as permitted by law).

- Banking information
- Information from third parties such as recruiters, employment agencies, online networks, and other vendors
- Usage and interaction data, account credentials, IP addresses, online identifiers, and cookies from online sites and applications of HWT and its service providers
- Inferences reflecting an applicant's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, aptitude, and abilities

## **HOW WE USE THIS PERSONAL INFORMATION**

HWT may use the personal information it collects about its applicants for one or more of the following purposes:

- To communicate with applicant or applicant's agents
- To identify potential applicants
- Assessment of skills, qualifications, interests and suitability for job role
- Preparation for interviews and hiring decisions
- Interviewing, staffing, and compensation decisions
- Assessment and verification of information obtained during recruiting process, including reference and background checks as permitted by law
- Preparing employment offers, offer negotiations
- For work permits, housing or relocation purposes
- Providing information in advance of employment
- Providing information about other job positions and openings
- Providing, supporting, and developing human resources and personnel functions
- Managing and maintaining recruiting, hiring, and other employment-related functions and programs
- Creating and maintaining personnel files, including emergency contact information
- Reimbursement of travel and other expenses
- Administering, maintaining, and developing HWT websites and applications
- Developing a profile reflecting an applicant's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, aptitude, and abilities
- Carrying out contractual obligations and enforcing rights under contracts
- As necessary to protect the rights, property, or safety of HWT or any person
- Responding to law enforcement requests
- As required by, and to comply with, applicable state and federal law, regulation, court order, or government request
- To evaluate or complete a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding
- As described at the time the personal information is collected

## HOW WE MAY SHARE AND DISCLOSE THIS PERSONAL INFORMATION

**Service Providers:** We may disclose personal information to third party service providers so they can perform functions for and provide services to HWT. Such service providers include:

- Banking institutions
- Travel agencies
- Recruiters and employment agencies
- Website hosting providers
- Cloud storage and application providers
- IT support providers
- Security services providers
- Data analytics providers

**Law and Public Interest:** We may disclose personal information of applicants to the following if we think that it is reasonably necessary or as required by law:

- U.S. Department of Labor
- State of California Employment Development Department
- Federal, state, county or other local courts
- Any other government, quasi-government or law enforcement agency
- A third party evaluating a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding

**Affiliates:** We may disclose personal information to affiliates of HWT to allow them to consider you for employment or other services, or as otherwise permitted by this Privacy Notice or applicable law or regulation.

## WE DO NOT SELL THIS PERSONAL INFORMATION

In the preceding twelve (12) months, HWT has not sold any personal information of its applicants and currently has no intention to do so. If, in the future, HWT anticipates selling such personal information, we will provide you with all rights required by the CCPA.

## CHANGES TO THIS PRIVACY NOTICE

HWT reserves the right to amend this Privacy Notice at our discretion at any time. When we make any changes, we will provide you with the updated Privacy Notice via your email address on file with HWT.

## **CONTACT INFORMATION**

If you have any questions about this Privacy Notice, or any manner in which HWT is collecting, using, or disclosing your personal information, please contact us at:

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