

# Davies Group Ltd.: California Consumer Privacy Statement

**Last Updated: September 13, 2023**

This California Consumer Privacy Statement supplements the [www.davies-group.com](http://www.davies-group.com) Privacy Notice (“Davies Privacy Notice”) and applies solely to personal information Davies Group Ltd. (“Davies”) collects online and offline about California consumers, such as our website visitors, business partners and job applicants. This California Consumer Privacy Statement does not apply to personal information collected about Davies personnel or to personal information we process in our role as a service provider to other businesses.

This California Consumer Privacy Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and its implementing regulations (collectively, the “CCPA”).

## Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the Last Updated date of this California Consumer Privacy Statement) the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers, and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, IP address, email address, account name, Social Security number, driver’s license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, bank account number, credit card number, debit card number, or other financial information, education information, medical information and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, which you may provide us when applying for jobs with Davies, such as race, color, national origin, , age, sex, gender, marital status, medical condition, , , disability, citizenship status, and military and veteran status
- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements.

- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information such as résumé information, occupation details, education details, certifications and professional associations, historical compensation details, previous employment details, emergency contact information, and pre-employment screening and background check information, including criminal records information
- **Education Information:** education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use (and may have used during the 12-month period prior to the Last Updated date of this California Consumer Privacy Statement) your personal information for the purposes described in the Davies Privacy Notice and for the following business purposes:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or verifying customer information, processing payments, providing analytics services, providing storage, or providing similar services;
- Providing advertising and marketing services;
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Short-term, transient use, such as nonpersonalized advertising shown as part of your current interaction with us;
- Helping to ensure security and integrity;
- Undertaking activities to verify or maintain the quality or safety of our services or devices and to improve, upgrade, or enhance them;
- Debugging to identify and repair errors;
- Undertaking internal research for technological development and demonstration;
- Managing career opportunities with us; and
- Managing our relationships with current or prospective partners, corporate customers and vendors and other business partner personnel.

We do not collect or process sensitive personal information for purposes of inferring characteristics about consumers.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

#### Retention of Personal Information

We will retain your personal information for the time period reasonably necessary to achieve the purposes described in the Davies Privacy Notice and this California Consumer Privacy Statement, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

### Sources of Personal Information

During the 12-month period prior to the Last Updated date of this California Consumer Privacy Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you, such as when you contact us
- Your devices, such as when you use our Services
- Our affiliates and clients
- Service providers, contractors and other vendors who provide services on our behalf
- Our joint marketing and business partners
- Online advertising services
- Data analytics providers
- Internet service providers (“ISPs”)
- Operating systems and platforms
- Social networks
- Recruiting and talent agencies
- Job references, such as your employers or teachers
- Data brokers, such as public databases, credit bureaus, credit reporting service providers and background check services

### Sale or Sharing of Personal Information

We do not sell your personal information in exchange for monetary compensation. We may share your personal information by allowing certain third parties (such as online advertising services) to collect personal information via automated technologies on our websites and apps for cross-context behavioral advertising purposes. This kind of sharing may be considered a “sale” under California law when the personal information is exchanged for non-monetary consideration. You have the right to opt out of these types of disclosures of your information.

We may sell or share for cross-context behavioral advertising purposes (and may have sold or shared during the 12-month period prior to the Last Updated date of this California Consumer Privacy Statement) the following categories of personal information about you to online advertising services:

- Identifiers
- Online Activity
- Inferences

You have the right to opt-out of this disclosure of your information, as detailed below. We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

Disclosure of Personal Information

During the 12-month period prior to the Last Updated date of this California Consumer Privacy Statement, we may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

Category of Personal Information	Categories of Third Parties
Identifiers	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Online advertising services</li> <li>• Data analytics providers</li> <li>• Social networks</li> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>
Additional Data Subject to Cal. Civ. Code § 1798.80	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Online advertising services</li> <li>• Data analytics providers</li> <li>• Social networks</li> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>
Protected Classifications	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our business partners</li> <li>• ISPs and operating systems and platforms</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Social networks</li> </ul>

Category of Personal Information	Categories of Third Parties
	<ul style="list-style-type: none"> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>
Online Activity	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Online advertising services</li> <li>• Data analytics providers</li> <li>• Social networks</li> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>
Sensory Information	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Social networks</li> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>
Employment Information	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Online advertising services</li> <li>• Data analytics providers</li> <li>• Social networks</li> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>
Education Information	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Online advertising services</li> <li>• Data analytics providers</li> <li>• Social networks</li> </ul>

Category of Personal Information	Categories of Third Parties
	<ul style="list-style-type: none"> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>
Inferences	<ul style="list-style-type: none"> <li>• Our affiliates and clients</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing and business partners</li> <li>• Online advertising services</li> <li>• Data analytics providers</li> <li>• Social networks</li> <li>• ISPs and operating systems and platforms</li> <li>• Data brokers, such as credit bureaus, credit reporting service providers, background check services</li> </ul>

In addition to the categories of third parties identified above, during the 12-month period prior to the Last Updated date of this California Consumer Privacy Statement, we may have disclosed personal information about you to government entities and third parties in connection with corporate transactions, such as mergers, acquisitions or divestitures.

California Consumer Privacy Rights

You have certain choices regarding your personal information, as described below.

- Access: You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed, and sold or shared about you.
- Correction: You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.
- Deletion: You have the right to request that we delete certain personal information we have collected from you.
- Opt-Out of Sale or Sharing: You have the right to opt-out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes.

**How to Submit a Request.** To submit an access, correction or deletion request, please download the California Data Subject Request form and email a completed form to us at: [usprivacy.dpo@us.davies-group.com](mailto:usprivacy.dpo@us.davies-group.com) with the subject line “CCPA Request” or call us at:

**(800) 490-5759.** You can opt-out of the sale or sharing of your personal information by clicking to **“Do Not Sell or Share My Personal Information”** or using the Global Privacy Control signal. To submit a request as an authorized agent on behalf of a consumer, please download the California Data Subject Request form and email a completed form to us at: [usprivacy.dpo@us.davies-group.com](mailto:usprivacy.dpo@us.davies-group.com) with a subject line **“CCPA Authorized Agent Request”**

**Verifying Requests.** To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your deletion or correction request. We may require you to provide any of the following information:

- Name
- Address
- Phone Number
- Email

In addition, if you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

**Additional Information.** If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

### **How To Contact Us**

If you have any questions regarding this HR Privacy Notice for California Consumer Privacy Statement or our privacy practices, please contact us at [usprivacy.dpo@us.davies-group.com](mailto:usprivacy.dpo@us.davies-group.com)