

RUE GILT

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CALIFORNIA APPLICANT PRIVACY NOTICE

The purpose of this Privacy Notice (“**Notice**”) is to inform applicants for employment with Rue Gilt Groupe or its subsidiaries (collectively, the “**Company**” or “**we**” or “**us**”) of the categories of personal information we collect and describe the purposes for which we collect, use, disclose, and otherwise process such personal information relating to job applicants and potential candidates for positions with the Company (each, an “**Applicant**”, “**you**” or “**your**”). This Notice is intended to satisfy our notice and privacy policy requirements under the California Consumer Privacy Act and the regulations issued thereto, each as amended (collectively, the “**CCPA**”), and comply with all other applicable laws. If any provision below conflicts with a legal requirement, then the Company will comply with the applicable law. We encourage you to carefully read this Notice, together with any other privacy notice we may provide to you.

1. Scope

This Notice applies, generally, to the Applicant personal information that we collect and otherwise process about Applicants, in the context of reviewing, assessing, considering, managing, storing, or processing their applications or otherwise considering them for a position with us. This Notice does not address or apply to our collection of personal information that is not subject to the CCPA, such as consumer credit reports and background checks, publicly available data, or other information that is exempt under the CCPA.

2. Categories of Personal Information Collected and Disclosed

The table below generally identifies the categories of personal information about Applicants that we collect, as well as the categories of third parties to whom we may disclose this information for a business or commercial purpose. In some cases (such as where required by law), we may ask for consent or give you certain choices prior to collecting or using certain personal information.

Category of Personal Information	Description	Third Party Disclosures for Business or Commercial Purposes
Identifiers	May include, but is not limited to, your personal contact details, such as your real name, alias, mailing address, email address, cell phone, IP address, account name, social security number, driver’s license number, and other government identifiers.	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.
Professional or Employment-related Information	Such as performance information, professional membership records, references, assessment records, resumes, cover letters and work history, attendance records, conduct information (including disciplinary and grievance records), and termination data.	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.
Education Information	Such as degrees earned, educational institutions attended, transcripts, training records, and other information about your educational history or background that is not publicly available personally identifiable information as defined under the Family Educational Rights and Privacy Act (FERPA).	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.

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Category of Personal Information	Description	Third Party Disclosures for Business or Commercial Purposes
Categories of Personal Information Described in Cal. Civ. Code § 1798.80	Records containing personal information, such as name, signature, photo, contact information, education and employment history, government identifiers, financial or payment information, or medical information.	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.
Internet or Other Electronic Network Activity Information	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an internet website or application, as well as physical and network access logs and other network activity information related to your use of any Company device, network, or other information resource.	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.
Geolocation Data	Location information about a particular individual or device.	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.
Characteristics of Protected Classifications under California and Federal Law	Such as race/ethnicity, gender, sex, veteran status, disability, and other characteristics of protected classifications under California or federal law. (<i>Note: generally, this information is collected on a voluntary basis and is used in support of our equal opportunity and diversity efforts and reporting obligations, or where otherwise required by law</i>).	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.
Audio, Electronic, Visual, or Similar Information	Audio, electronic, visual, or similar information, such as CCTV/video footage, photographs, call recordings, and other audio recording (e.g., recorded webinars).	• Affiliates and subsidiaries • Service providers • Advisors and agents • Regulators, government entities, and law enforcement • Internet service providers, operating systems, and platforms • Others as required by law.
Sensitive Personal Information	Such as: (a) government identifiers; (b) financial account and payment information (e.g., for reimbursement purposes); (c) racial or ethnic origin or sexual orientation (e.g., on a voluntary basis to support our equal opportunity and diversity efforts and reporting obligations, or where otherwise required by law); and (d) health information (e.g., as necessary to provide reasonable accommodations).	• Affiliates and subsidiaries • Service providers • Advisors and agents • Others as required by law.

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We do not sell or share (as defined by the CCPA) the personal information or sensitive personal information related to Applicants. Any disclosures of Applicant information are limited to service providers and contractors that process information on our behalf (such as background check providers, recruitment platforms and IT support) and are subject to contractual obligations restricting their use of the information.

Sources of Personal Information. In general, we may collect Applicant personal information identified in the table above from the following categories of sources:

- Directly from you
- Recruiter and recruiting platforms
- Referrals and references
- Publicly available information and data brokers
- Service providers, representatives, and agents
- Affiliates and subsidiaries

Retention. The Company retains the personal information we collect as reasonably necessary for the purposes described herein or otherwise disclosed to you at the time of collection. For example, we will retain your information as necessary to comply with our tax, accounting, and recordkeeping obligations, to consider you for additional positions (with your permission), as well as an additional period of time as necessary to protect, defend, or establish our rights, defend against potential claims, and comply with our legal obligations.

3. **Purposes for Collecting, Using, Disclosing, and Processing Personal Information**

We collect, use, disclose, and process Applicant personal information for the following purposes (subject to applicable legal restrictions):

- **Recruitment and Hiring:** to review and evaluate applications; schedule interviews; verify qualifications; communicate with Applicants; extend and negotiate offers; assess compensation; maintain records for future consideration; and support equal opportunity practices.
- **Business Operations:** to manage and improve our operations, client services, training, quality control, auditing, and reporting obligations.
- **Security and Monitoring:** to protect our systems, networks, premises, and assets; manage access controls; investigate or respond to security or privacy incidents.
- **Compliance and Governance:** to comply with employment, labor, tax, social security, workplace safety, and other applicable legal obligations and to conduct audits, reviews, and corporate governance activities.
- **Transactions and Legal Matters:** to plan or carry out mergers, acquisitions, or reorganizations; seek advice from lawyers, auditors and other professional advisers; and to defend or enforce our rights and respond to legal claims or disputes.
- **Health and Safety:** to protect workplace health and safety, including screenings or contact tracing where legally required.
- **Future Opportunities:** to consider Applicants for other suitable positions and to contact them about such opportunities (unless they opt out).

Sensitive Personal Information. We do not collect, use, or disclose sensitive personal information about Applicants except as permitted under the CCPA. This means we only use such information as reasonably necessary to provide requested services, ensure security, prevent fraud or illegal activity, maintain service quality, comply with legal obligations, work with service providers on our behalf, and never for the purpose of inferring characteristics about you.

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4. Your CCPA Rights

If you are a California Applicant, you have certain rights under the CCPA with respect to your personal information, subject to certain limitations and exceptions:

- **Deletion:** the right to request deletion of your personal information that we have collected about you.
- **Know/Access:** the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- **Correction:** the right to request correction of inaccurate personal information we maintain about you.
- **Opt-out of sales and sharing:** the right to opt-out of the sale and sharing of your personal information. However, as discussed above, we do not sell or share Applicant personal information.
- **Limit use/disclosure of sensitive personal information:** the right to request to limit certain uses and disclosures of sensitive personal information. However as discussed above, we do not use or disclose Applicant personal information beyond the purpose authorized by the CCPA.
- **Right to Non-Discrimination:** the right not to be subject to discriminatory treatment for exercising rights under the CCPA.

Submitting CCPA Requests. Applicants may submit a request to the Company to exercise their CCPA rights to know/access, to delete, and to correct their personal information held by us by submitting a privacy request to us by emailing security@ruegiltgroupe.com. We will take steps to verify your request by matching the information provided by you with the information we have in our records. Your request must:

- **Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative (i.e., by completing all required fields on our webform if you choose to submit a request in that manner).**
- **Describe your request with sufficient details that allows us to properly understand, evaluate, and respond to it.**

In some cases, we may request additional information in order to verify your request or where necessary to process your request. Authorized agents may initiate a request on behalf of another individual through one of the above methods; authorized agents will be required to provide proof of their authorization and we may also require that the relevant applicant directly verify their identity and the authority of the authorized agent.

5. Questions

If you have any questions about this Notice, or to request this Notice in another format, please contact legal@ruegiltgroupe.com.