

Blue Trust Personal Information Privacy Notice

August 2025

This Privacy Notice is made available pursuant to the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). Please review this notice carefully as it applies to the personal information we collect about you solely in your capacity as a Blue Trust, Inc. applicant, job candidate, employee, or former employee.

In this Notice, Personal Information includes such information that identifies and describes who you are, as well as information that relates to or is capable of being associated with, or could be reasonably linked to you, one of your devices, and/or a member of your household.

You have the right to know what Personal Information we collect, use, and disclose.

Blue Trust collects and uses Personal Information for human resources, employment, placement, payroll information, benefits administration, health and safety, and other business-related purposes and to be in legal compliance. Below are the categories of Personal Information we may collect and the purposes for which we intend to use this information:

- **Identifying information**, such as your full name, gender, date of birth, and signature.
- **Demographic data**, such as race, ethnic origin, marital status, disability, and veteran or military status.
- **Contact information**, such as your home address, telephone numbers, email addresses, and emergency contact information.
- **Dependent's or other individual's information**, such as their full name, address, date of birth, and Social Security numbers (SSN).
- **National identifiers**, such as SSN, passport and visa information, and immigration status and documentation.
- **Educational and professional background**, such as your work history, academic and professional qualifications, educational records, references, and interview notes.
- **Employment details**, such as your job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records.
- **Financial information**, such as banking details, tax information, payroll information, and withholdings.
- **Health and Safety information**, such as health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, and health insurance policy information.
- **Information Systems (IS) information**, such as your search history, browsing history, login information, and IP addresses on the Company's information systems and networks.
- **Biometric information**, such as fingerprints, iris or retina scans.
- **Geolocation data**, such as time and physical location related to use of an internet website, application, device, or physical access to a Company or client office location.

- **Sensory or surveillance information**, such as COVID-19 related temperature checks and call monitoring and video surveillance.
- Profile or summary about an applicant/employee's preferences, characteristics, attitudes, intelligence, abilities, and aptitudes.

The Company collects Personal Information to use or disclose as appropriate to:

- Comply with all applicable laws and regulations.
- Recruit and evaluate job applicants and candidates for employment.
- Conduct background checks.
- Manage your employment relationship with us, including for:
 - onboarding processes;
 - offering you as a candidate to clients for placement with them and managing that placement;
 - timekeeping, payroll, and expense report administration;
 - employee benefits administration;
 - employee training and development requirements;
 - the creation, maintenance, and security of your online employee accounts;
 - reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
 - workers' compensation claims management;
 - employee job performance, including goals and performance reviews, promotions, discipline, and termination; and
 - other human resources purposes; and
- Manage and monitor employee access to company facilities, equipment, and systems.
- Conduct internal audits and workplace investigations.
- Investigate and enforce compliance with and potential breaches of Company policies and procedures.
- Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company.
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking.
- Administer and maintain the Company's operations, including for safety purposes.
- For client marketing purposes.

- Exercise or defend the legal rights of the Company and its employees, affiliates, customers, contractors, and agents.

Please note that Blue Trust does not sell your Personal Information and will only share your Personal Information with third-party service providers for the business purposes described above. Blue Trust may share your Personal Information with third-party service providers used to help deliver benefits and services related to your prospective or actual employment, such as identity verification providers, payment or payroll service providers, time and attendance programs, benefits programs, and more. Blue Trust may share your Personal Information where required by law upon request from law enforcement, government entities, or judicial order.

Blue Trust retains each category of Personal Information for as long as necessary to fulfill the purposes described in this Notice or as required by law, including for tax, legal, and employment recordkeeping purposes.

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact Blue Trust Human Resources at hrsupport@bluetrust.com.