

PROGRAM PRODUCTIONS, INC.

California Worker Privacy Policy

Effective Date: January 1, 2020

Last Reviewed: December 31, 2019

This **Program Productions, Inc. Privacy Policy for California Workers** (“**Policy**” or “**Notice**”) applies solely to all individuals that reside in the State of California who are job applicants, employees, directors, officers, or contractors (“**Workers**”) of Program Productions, Inc. (“**PPI**” or “**We**”). PPI has a different privacy policy for California residents who are not Workers. We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and any terms defined in the CCPA have the same meaning when used in this Notice.

PPI has not, does not, and will not sell Personal Information of Workers.

Information We May Collect

We may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Worker or device (“**Personal Information**”). In particular, we may have collected some or all of the following categories of Personal Information from those Workers who are subject to this privacy Notice within the last twelve (12) months:

Categories of Personal Information which We may collect
Identifiers. This includes your real name, alias, postal address, unique personal identifier, social security number, driver’s license number, telephone number, email, marital status, birth date, gender, educational data, passport number, or other similar identifiers, financial information including bank account number, credit card number, debit card number, or other financial account information used, for example, in connection with payroll processing, and characteristics of protected classifications including but not limited to: race, ethnicity, age, citizenship, marital status, medical condition, physical or mental disability, gender, pregnancy or childbirth and related medical conditions, veteran or military status.
Sensitive Data. This includes data like financial account numbers, SSN, medical data, biometric data, performance reviews, etc.
Transactional Data. This includes data you may share with PPI or PPI affiliates when you are acting in your capacity as a consumer instead of an employee. For example, when you directly or indirectly buy products or services or rent a vehicle.
Biometric information. This includes information like ID badge photos, fingerprints or other unique identifying information used with time keeping systems, security camera video footage of you, and recordings of phone calls with PPI.
Internet or other similar network activity. You use various PPI’s or PPI affiliates’ electronic

or technical equipment and systems for your work. Your activity on these systems, from broadcast or other video and audio recordings, to email to web browsing, is collected and used. This includes information relating to your use of PPI's or our affiliates' information and communications systems, information relating to your use of television recording or broadcast equipment, information and communications systems, including browsing history, search history, information regarding your interaction with an Internet Web site or online job boards, log-in details, software application usage, VoIP phone usage, file share access, personal data processed on our payroll or IT systems including information contained in emails, through message applications or contained in documents sent by you.

Geolocation data. This can include location data we may use in connection with your log-in and log-out at events, or GPS data collected in connection with your use of a rented or provided vehicle.

Sensory data. This is data which may or may not be related to you directly, as it is usually data coming from devices like security motion detectors or similar devices. However, if it is tied to other data, like key card access logs, it can become Personal Information.

Professional or employment-related information. This is all the data related to your employment with PPI, including but not limited to Personal Information related to individuals who receive benefits from PPI as a result of your status as a Worker with PPI. For example, it can include "right to work" documents, payroll and benefits data, medical leave data, location of workplace, job titles, work history, work hours, or other kinds of information necessary for PPI to acquire, manage, and retain talent in its workforce.

Non-public education information. This is information related to your academic credentials such as what school you went to, what your GPA was, what activities or sports you did in school, or other data on your school transcripts.

PPI Inferences based on Personal Information. This includes information in performance reviews, any testing or training you may have undertaken, information related to succession planning, as well as predictive analytics related to your use of PPI's or PPI affiliates' IT systems and networks.

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated information.
- Information excluded from the CCPA's scope

PPI obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase (if any).
- Indirectly from you. For example, from observing your actions as a Worker, from records of your use of PPI information technology, or from location-tracking enabled devices connected to PPI assets you may use as part of your regular employment related activities with PPI.

- From independent third parties as permitted by law, related to your eligibility for employment, driving or criminal background, Employment Eligibility Verification Services (such as the U.S. Citizenship and Immigration Services), or as part of our ongoing management of our business.
- Other Workers, as part of PPI's management, evaluation, training, investigation, and discipline processes

Use of Personal Information

We may process or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to apply for a job at PPI, or, request time off, or, in order to administer benefits, or to process payroll.
- To provide, support, personalize, and develop our Worker population.
- To provide you with support and to respond to your inquiries.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information.
- Disclosures made to prevent or halt violations of PPI policies, illegal activities, or as required by law.
- Disclosures that we reasonably believe are necessary to defend against or prevent PPI or PPI affiliates from incurring liability to third parties.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- To make decisions concerning your continued engagement, or frequency of engagement by PPI.
- For other purposes as permitted by law.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice by updating and posting this Notice on PPI's website.

Sharing Personal Information

PPI is part of the P&E Services Group and is affiliated with other clients and companies where certain personnel or services are provided by one or more affiliated clients or companies for the entire group or a part of it. We, therefore, reserve the right to share Personal Information with our direct and indirect affiliates for all purposes described above. Whenever we share Personal Information with affiliates, we request from them that they commit themselves to process Personal Information in line with this privacy Notice only.

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter into an agreement that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract. These third parties are “Service Providers” as defined by applicable law. We do not share Personal Information with any third parties, who are not Service Providers, where PPI may receive a financial benefit from such sharing.

We may also disclose your Personal Information to another company as part of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets to that company; or where required by PPI policy, law, or in response to valid legal process compelling disclosure.

Disclosures of Personal Information

In the preceding twelve (12) months, PPI has disclosed some or all of the categories of Personal Information noted above, for the business purposes described above.

We disclose your Personal Information for a business purpose only to Service Providers, or, where required by law, or in response to valid legal process compelling disclosure.

Sales of Personal Information

In the preceding twelve (12) months, Company has not sold Personal Information. PPI does not and will not sell Personal Information of Workers.

Changes to Our Privacy Notice

PPI reserves the right to amend this privacy Notice at our discretion and at any time. When we make changes to this privacy Notice, we will post the updated Notice on PPI’s website and update the Notice’s effective date. Changes will be effective upon the posting of the updated Notice on our website.

Contact Information

If you have any questions or comments about this Notice, the ways in which PPI collects and uses your information, please do not hesitate to contact either PPI’s HR representative at HR@ProgramProductions.com.