

# California Privacy Notice

Last updated on 7/12/2023

This Privacy Notice supplements the information contained in the Revel IT Privacy Policy and applies solely to potential clients and job seekers who reside in the State of California and use our Services. We adopt this Privacy Notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”), and Proposition 24, the CPRA, which amended the CCPA and added new additional privacy protections that began on January 1, 2023.

## Types of Personal Information We Collect

Revel IT collects information from two types of users, clients, and job seekers. We 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 Consumer or Device.

## Categories of Personal Information Collected

The following is a list of categories of personal information which we may collect, or which may have been collected from California residents within the last twelve (12) months. Please note that the categories and examples provided in the list below are those defined in the CCPA/CPRA.

- **Category A: Identifiers**

User Type	Examples	Collected?
Client	Name, alias, postal address, email address, telephone number, social media profile, social media address, username, unique personal identifier, online identifier, Internet Protocol (IP) address, device IDs, account name, and other similar identifiers.	Yes
Job Seeker	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers	Yes

• **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**

User Type	Examples	Collected?
Client	A name, postal address, telephone number, email address.	Yes
Job Seeker	Name, Social Security number, postal address, telephone number, passport number, driver's license or state identification card number, education, employment, and employment history. Some personal information included in this category may overlap with other categories.	Yes

• **Category C: Protected classification characteristics under California or federal law.**

User Type	Examples	Collected?
Client	N/A	N/A
Job Seeker	Birth date, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No

• **Category D: Commercial information.**

User Type	Examples	Collected?
Client	Records and history of the job openings submitted.	Yes
Job Seeker	Records and history of the job postings applied for.	Yes

• **Category E: Biometric information.**

User Type	Examples	Collected?
Client	N/A	No
Job Seeker	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and	No

	voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
--	--	--

● **Category F: Internet or other similar network activity.**

User Type	Examples	Collected?
Client	Search history, access dates and times, browsing history, browser type and version, device information, cookie data, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Website, and other similar activity concerning an interaction with our Services.	Yes
Job Seeker	Search history, access dates and times, browsing history, browser type and version, device information, cookie data, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Website, and other similar activity concerning an interaction with our Services.	Yes

● **Category G: Geolocation data.**

User Type	Examples	Collected?
Client	Time zone setting and approximate location; latitude and longitude.	Yes
Job Seeker	Time zone setting and approximate location; latitude and longitude.	Yes

● **Category H: Sensory data.**

User Type	Examples	Collected?
Client	Audio, electronic, visual, thermal, olfactory, or similar information.	No
Job Seeker	Audio, electronic, visual, thermal, olfactory, or similar information.	No

● **Category I: Professional or employment-related information.**

User Type	Examples	Collected?
Client	Job title and company name.	Yes
Job Seeker	Job searches, job applications, any information provided in a resume/CV or job seeker profile (including, but not limited to,	Yes

	executive summary, objective, current or prior work experience and education).	
--	--	--

● **Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).**

User Type	Examples	Collected?
Client	N/A	N/A
Job Seeker	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No

● **Category K: Inferences drawn from other personal information.**

User Type	Examples	Collected?
Client	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	N/A
Job Seeker	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

## Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from you** – for example, when you fill in forms, submit your resume/CV, or correspond with us by post, phone, e-mail or otherwise.
- **Indirectly from you** – for example, through automated technologies or your interactions with us, including from observing your actions when you use our Website.
- **From Your Company.** If your company is a Client, we may receive personal information about you from your company for purposes of using our services.

- **Third Parties** – we may receive personal information about you from various third parties, such as data analytics providers, data brokers (for business-related data), advertising networks, service providers, third parties you directly interact with on our Website, or other third parties that you direct to share information with us.

## **Use of Personal Information for Business Purposes or Commercial Purposes**

We may use or disclose personal information We collect for "business purposes" or "commercial purposes"(as defined under the CCPA), which may include the following examples:

- To fulfill or meet the reason for which the personal information is provided.
- To provide You with support and to respond to Your inquiries, including to investigate and address Your concerns and monitor and improve our Service.
- To communicate with you about your account or our Services, and to manage our relationship with you.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To send you job-related text messages (SMS), if you have consented to receive such messages.
- For internal administrative and auditing purposes.
- To help maintain the safety, security, and integrity of our Services.
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
- As described to You when collecting Your personal information or as otherwise set forth in the CCPA.

## **Disclosure of Personal Information for Business Purposes or Commercial Purposes**

We disclose your personal information when you direct us, or intentionally use Revel IT to share your personal information in connection with the services that we provide. For example:

- If you are a Job Seeker and apply to a job posting on our Website, we will share your personal information with that prospective employer and/or its agent or representative (including but not limited to, external Applicant Tracking Systems or any other external systems used by the direct employer to manage the hiring of employees or other categories of workers).
- If you are a Client, and you request that Revel IT assist in helping to identify candidates to apply to or interview for your job, we will disclose your personal

information with the prospective candidate to invite them to apply or interview with you. We will also disclose your personal information at your direction for any other purpose as specified on the Website or within the Services, provided you agree to such disclosure.

Pursuant to the CCPA, in the preceding twelve (12) months, we may have disclosed the following categories of personal information at your direction, depending on the information that you provided through your resume, and/or job application materials:

Category A: Identifiers

Category B: California Customer Records personal information categories

Category C: Protected classification characteristics under California or federal law

Category F: Geolocation data

Category G: Professional or employment-related information

Revel IT does not use or disclose sensitive personal information, except as necessary to perform our services.

## **Sale or Sharing of Personal Information**

Your privacy is our priority, and we do not monetize your personal information by selling it to third parties.

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact sold but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We may share Your personal information identified in the above categories with the following categories of third parties:

- Service Providers
- Our affiliates
- Our business partners
- Clients to whom You or Your agents authorize Us to disclose Your personal information in connection with the services We provide to You

Revel IT does not sell or share any of your sensitive personal information and does not sell or share the personal information of consumers under 16 years of age.

## Your Rights under the CCPA/CPRA

The CCPA provides California residents with specific rights regarding their personal information. If You are a resident of California, and the CCPA does not recognize an exception that applies to you or your personal information, You have the following rights:

**Right to Know** – The right to request that we disclose to you the categories of personal information we collect, use, or disclose, and information about our data practices.

**Right to Access** – The right to access specific pieces of personal Information or categories of personal information collected about you and to know the source from which it was collected, the business or commercial purpose for which it was collected or shared and the categories of third parties with whom the personal information was shared

**Right to Delete** – The right to request that Revel IT delete your personal information that we have collected from you.

**Right to Correct** – The right to request that Revel IT correct any inaccurate personal information that it maintains about you.

**Right to Opt-Out of Sale or Sharing** – The right to opt-out of the sale or sharing of your personal information to third parties.

**Right of No Retaliation** – The right not to be discriminated against because you exercised any of your CCPA rights.

## How to Exercise Your CCPA Data Protection Rights

if You are a California resident and would like exercise any of CCPA rights described above, submit a verifiable request using one of these two methods:

- Submit an information request on our website: [www.revelit.com/contact](http://www.revelit.com/contact)

- Send a written request to:

Revel IT  
4900 Blazer Parkway  
Dublin, OH 43017  
Attn: CCPA Compliance

Only You, or a person registered with the California Secretary of State that You authorize to act on Your behalf, may make a verifiable request related to Your personal information.

Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative
- Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to Your request or provide You with the required information if we cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You
- We will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, We will select a format to provide Your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.

## **Changes to this California Privacy Notice**

We may update Our California Privacy Notice from time to time. We will notify You of any changes by posting the new Privacy Notice on this page.

We will let You know via a prominent notice on our website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Notice.

You are advised to review this Privacy Notice periodically for any changes. Changes to this Privacy Notice are effective when they are posted on this page.



## Contact Us

If you have any questions about this Privacy Notice, You can contact us:

- By visiting this page on our website: [www.revelit.com/contact/](http://www.revelit.com/contact/)
- Via email at: [privacy@revelit.com](mailto:privacy@revelit.com)