

# Privacy Policy

Pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (collectively, the “CCPA”), By Light Professional IT Services, and its affiliates (“By Light,” “we,” or “us”) are providing the following Privacy Statement to explain how By Light collects, uses and discloses Personal Data that we collect from individuals who are residents of California, including but not limited to users who visit our websites, consumers, and employees.

For purposes of this Privacy Statement, Personal Data is information that identifies, relates to, or could reasonably be linked with a particular California resident or household.

By Light also has Privacy Policies that applies to the By Light enterprise. An overview of our privacy policies can be found [on our Policies & Privacy page](#) on ByLight.com.

## **Collection, Disclosure, and Sharing of Personal Data**

This section provides details regarding the categories of Personal Data we collect and process, as well as the categories of third parties that may have access to your Personal Data for operational business purposes.

## **Sources of Personal Data**

We collect personal information you voluntarily provide to us during the application process, onboarding process, through our administration of payroll, benefits, and other employment functions, and **when you otherwise visit our website’s “contact us” page**. We may also automatically collect certain information, **such as IP addresses and device identifiers**.

## **Personal Information By Light Collects**

Below are the categories of Personal Information that we may have collected or shared for a business purpose in the last (12) months, as permitted by law:

**\*Denotes Sensitive Personal Information as defined by CPRA.**

Category	Examples
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, <i>driver's license number</i> , passport number*, or other similar identifiers.
Personal Information	Your identity: to include last name, first name, maiden name; date of birth; sex; race/ethnicity; <i>home address; home telephone number; home email, name and telephone number of a contact in case of emergency; passport number</i> and related materials for processing of residency or other immigration status (if applicable); driver's license number* (if applicable); work permit number; social security number* (if applicable and only as required for payroll, benefit, insurance, and work eligibility purposes); other identification document numbers (if applicable) provided for work eligibility purposes; country of birth and nationality* (if applicable); bank account details; <i>employee identification number; and, if any, your disability rate</i> (if applicable) as required for By Light to comply with its legal duty; your disability* and veteran status (if applicable); marriage certificates and banking loan information* for processing for relocation matters; and personal banking information* for processing of payroll. Family status: to include marital status; last name, first name and date of birth of your spouse or partner (should you and your spouse or partner wish to be added to your insurance); last name, first name, and date of birth of your children (should you wish to add them to your insurance); last name, first name, and date of birth for any designated beneficiaries; insurance information; retirement account information
Protected classification characteristics under California or federal law	Age (40 years or older), race, <i>color</i> , ancestry, <i>national origin</i> , citizenship, religion or creed, <i>marital status, medical condition</i> , physical or mental disability, <i>sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation</i> , veteran or military status, genetic information* (including familial genetic information). Some personal information included in this category may overlap with other categories.
Internet or other similar network activity	Information may be automatically collected by our website, including your IP address, the address of the site you visited just prior to ours, and number of times an article or page from our site has been shared.
Geolocation	Information identifying your physical location or movements
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information
Education Information	Education and development: to include diplomas and training certificates held; languages and proficiency (if applicable); curriculum vitae detailing your work experience and if applicable, military experience (but not the reasons for deferment or rejection from the military service, if any); continuous training; mobility situation and management of career development actions; performance evaluations; training programs completed.
Professional and employment- related information	Employment terms and conditions: employment status; to include fixed-term contract or open-ended contract (if applicable); part-time or full-time job; hire date; termination date; division; department; reporting structure; job title; pay grade; work telephone number and work email address; job description; salary schedule and other

**Detailed Description of Categories of Third Parties**

Third Parties that By Light may disclose your Personal Data to are as follows:

**Service Providers/Subcontractors**

By Light may share your Personal Data with our trusted vendors for certain business purposes. This information is provided in order for them to provide By Light with services such as payment processing, benefits administration, web analytics, data processing, IT services, customer support and other services such as for the purpose of auditing and fraud investigations.

### **Related Entities**

By Light may share Personal Data between and among its subsidiaries, and affiliated companies for purposes of management and analysis, and other business purposes. For instances, By Light may share your Personal Data with our subsidiaries and affiliated companies to expand and promote our service offerings.

### **Law Enforcement/Legal Authorities**

By Light may be required to disclose your Personal Data to third parties including law enforcement agencies when required to protect and defend our legal rights, protect the safety and security of users of our Services, prevent fraud, respond to legal process, or a request for cooperation by a government entity, as required by law.

### **Corporate Transactions**

In the event of sale, transfer, merger, reorganization, or similar event, By Light may transfer your Personal Data to one or more third parties as part of that transaction with the business entities or people involved in the deal negotiation or transfer.

### **With Your Consent**

By Light may share Personal Data about you with other third-party companies if you give us permission or direct us to share the information. By Light will share Personal Data with authorized agents that you authorize By Light to communicate to.

We have not sold Personal Data, including your Sensitive Personal Data, in the preceding 12 months. Without limiting the foregoing, we do not sell Personal Data, including the Sensitive Personal Data, of minors under 16 years of age. We do not knowingly "share" Personal Data, including Sensitive Personal Data, of minors under 16 years of age.

### **Sources of Personal Data**

We collect personal information you voluntarily provide to us during the application process, onboarding process, through our administration of payroll, benefits, and other employment functions, and when you otherwise visit our websites contact us. We may also automatically collect certain information, such as IP addresses and device identifiers. We may combine personal information you voluntarily provide to us with information we collect from other sources, such as:

- Recruiters
- Pre-employment screening and background check services
- Credentialing and licensing organizations
- Publicly available sources, such as public social media profiles on LinkedIn, Twitter or Facebook
- Other sources as provided by you.

### **Purposes for the Collection, Use and Sharing of Personal Data**

By Light business purposes for processing personal data pertaining to consumers. Personal data pertaining to consumers with whom By Light has a business relationship may be processed as needed:

**Salary and Benefits.** Personal information is used to administer the salaries, benefits, and insurance that you receive under your employment agreement, including annual merit increases, any other salary adjustments, annual bonus payments and retirement plan management, including other benefits provided to retirees; income tax; and social security withholdings.

**Security:** Some of your personal information is collected and processed for security purposes including office access and IT resources access. Personal information may be collected during IT resources security procedures, including security penetration tests, for which IT experts will try to access our system to find any security breaches.

- **General Management and Human Resources Administration:** Personal information may also be used for administration purposes, including employee feedback through the use of employee surveys and contacting employees; administration of email systems and company directories; assignment of offices and other Company equipment; assignment of identification badges; and evaluations performed for purposes such as headcount, diversity and inclusion measures and overall corporate programs, to promote an optimal workplace personal information may also be used for By Light's planning and budgeting, financial reporting, corporate reorganizations, outsourcing, restructuring and acquisitions and investments. Personal information may also be used for human resources administration such as to obtain feedback from personnel about By Light and the work life environment, to identify areas where the organization can improve and related matters.
- **Monitoring:** We will only monitor your use of By Light IT Resources in accordance with applicable statutory requirements (including, if applicable, notification of relevant authorities).

- Performance in Your Job within By Light: To assign a workspace, office, computers, other By Light equipment, to keep track of the individuals to whom the equipment is assigned, and to enable access to By Light IT systems and applications, including third party applications used to perform your job.
- Travel Arrangements and Business Expense Processing: Personal information is used to make travel arrangements and to process business expenses associated with business travel; to process business expenses associated with approved coursework, books and periodicals, and training; to process business expenses associated with approved business.
- Performance Review and Management: By Light uses personal information to facilitate personnel performance management and career development, notably through annual performance appraisals; annual salary reviews, and; if any, disciplinary measures in accordance with local legislation
- Legal Obligations: We use your personal information to comply with our legal obligations, such as income tax and social security withholdings; disability and family leave obligations; or cooperation with courts, including civil actions, and with law enforcement agencies in legal investigations regarding suspected criminal activities or other suspected illegal activities. By Light may also use your personal information to comply with federal, state and local contracting and reporting obligations. Subject to local law requirements, By Light may use your personal information to protect our legal rights or support any claim, defense or declaration in a case or before any jurisdictional and/or administrative authority or arbitration or mediation panel, in the context of disciplinary actions/investigations or of internal or external audit and inquiries.

We may also use your Personal Information to:

- Verify or maintain the quality or safety of services owned, manufactured, or controlled by us.
- Comply with applicable laws or legal process, including court order or subpoena.
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons.
- Cooperate with law enforcement agencies regarding conduct that we reasonably and in good faith believe may violate applicable law
- Cooperate with government agencies in an emergency situation where an employee may be at risk of serious physical injury or death.
- Exercise or defend legal claims.

We retain your Personal Information for the period reasonably necessary to provide these goods and services to you, such as the term of your employment, and for the period reasonably necessary to support our business operational purposes listed above. We retain records consistent with our record retention policy, including appropriate disposal at the end of applicable retention periods.

Information may be automatically collected by our website, including your IP address, the address of the site you visited just prior to ours, and number of times an article or page from our site has been shared. When you share contact information via our websites (i.e. email address, phone number) we may use the information we collect to:

- Provide products and services.
- Send you promotional materials or other communications.
- Communicate with you about, and administer your participation in, special events, programs, offers, surveys, and market research.
- Respond to your inquiries.

#### **Retention Period**

We retain Personal Data for as long as needed or permitted considering the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using our services) and the length of time thereafter during which we may have a legitimate need to reference your Personal Data to address issues that may arise.
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them).
- Whether retention is advisable considering our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

## **California Consumer Rights**

If you are a California resident you may make the following requests, subject to applicable law:

### **Right to Access and Know** -- You may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of Personal Data we collected about you and the categories of sources from which we collected such Personal Data.
- The specific pieces of Personal Data we collected about you.
- The business or commercial purpose for collecting or sharing Personal Data about you.
- The categories of Personal Data about you that we shared (as defined under the applicable privacy law) and the categories of third parties with whom we shared such Personal Data.
- The categories of Personal Data about you that we otherwise disclosed, and the categories of third parties to whom we disclosed such Personal Data (if applicable).

**Right to Request Correction of your Personal Data** -- You may request to correct inaccuracies in your Personal Data.

**Right to Request Deletion of your Personal Data** -- You may request to have your Personal Data deleted.

**Right to Opt-out of Sharing for Cross-Context Behavioral Advertising** -- You may request to opt out of the “sharing” of your Personal Data for purposes of cross-context behavioral advertising.

We will not unlawfully discriminate against you for exercising your rights under the CCPA.

### **How to submit a California Rights Request**

To submit a privacy request, please email us at [privacy@bylight.com](mailto:privacy@bylight.com) or call (703) 224-1000. We will verify and respond to your request in accordance with applicable law, considering the type and sensitivity of the personal data involved. To verify your identity and protect against fraudulent requests, we may need to request additional Personal Data from you, such as your name and email address. If you have a password-protected account with us, we may verify your identity through our existing authentication procedures and require you to re-authenticate before disclosing or deleting your personal data. For deletion requests, we may also ask you to confirm your intention before proceeding with the deletion of your personal data.

### **Authorized Agents Submitting a Request on Behalf of a Consumer**

You may choose to designate an authorized agent to make a request under the CCPA on your behalf. No information will be disclosed until the authorized agent’s authority has been reviewed and verified. Agents may be asked to provide proof of their status as an authorized agent. Once a request has been submitted by an authorized agent, we may require additional information from you to verify your identity as described in the section entitled “How to Submit a California Rights Request” or confirm that you provided the agent permission to submit the request.

### **Changes to this California Consumer Privacy Statement**

We may change or update this Privacy Statement from time to time. When we do, we will communicate updates to this Privacy Statement by posting the updated Statement on this page with a new “Last Updated” date.

### **Contact Us**

If you have any questions regarding this California Consumer Privacy Statement, please contact us at [privacy@bylight.com](mailto:privacy@bylight.com). You may also reach us at:

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