

GLOBAL UPRISING, PBC D/B/A COTOPAXI CALIFORNIA HR PRIVACY NOTICE

Privacy Information for California Employees, Contractors, and Applicants

We collect Personal Information from current and past employees ('Employees'), Contractors and Applicants and comply with the California Consumer Privacy Act and related laws and regulations ("California privacy laws"). This California HR Privacy Notice applies to California Employees, Contractors, and Applicants ("you" or "your").

"Personal Information" means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Information:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of California privacy laws.

This Privacy Notice provides the following information to California Employees, Contractors, and Applicants:

- Categories of Personal Information we collect;
- Purposes for which we use Personal Information;
- Categories of Personal Information we disclose to third parties;
- Categories of third parties to which we disclose Personal Information; and
- How Employees, Contractors, and Applicants can exercise their rights under California privacy laws:
 - The rights to access, correct, or delete Personal Information;
 - The right to limit the use of sensitive Personal Information in certain circumstances; and
 - The rights to opt out of targeted advertising, sales of Personal Information, or profiling.

Categories of Non-Sensitive Personal Information

The table below outlines the non-sensitive categories of Personal Information Global Uprising, PBC d/b/a Cotopaxi collects about Employees, Contractors, and Applicants and whether and how they are disclosed to third parties.

We collect Non-Sensitive Personal Information from the following sources:

- Directly from our Employees, Contractors, and Applicants
- From our affiliates ("affiliates" are businesses that share common ownership with Global Uprising, PBC d/b/a Cotopaxi)
- From our business partners ("business partners" are companies that we have a pre-existing commercial relationship with)
- From data brokers ("data brokers" are companies engaged in the business of buying or collecting Personal Information and selling it to other businesses)

Category of Personal Information:

Identifiers

Examples

Identifiers may contain the following: full name, work and personal email addresses, mailing and residential addresses, home and mobile phone number(s), and social media handle

Purpose(s) for Collection

Providing human resource management services, including hiring, retention, and termination of employees. Complying with legal obligations and reporting requirements.

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information may be disclosed to Processors and Government Entities. We disclose Identifiers to meet employment-related government reporting requirements and to enable our processors to support us in providing a robust human resources program, including processing of potential applicant, applicant, employee former employee, and contractor data.

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled. Applicant data is retained for at least one year and employee data is retained throughout the employment period and for at least 2 years post-termination.

Category of Personal Information:

Personal Characteristics

Examples

Personal Characteristics may contain the following: characteristics of protected classifications under California or federal law (e.g., race, religion, gender, marital status and disability)

Purpose(s) for Collection

Providing human resource management services, including hiring, retention, and termination of employees. Complying with legal obligations and reporting requirements.

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information is not otherwise disclosed to third parties

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled

Category of Personal Information:

Commercial Information

Examples

Commercial Information may contain the following: Not applicable

Purpose(s) for Collection

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information is not otherwise disclosed to third parties

Retention Period

Not applicable

Category of Personal Information:

Internet/Electronic Activity

Examples

Internet/Electronic Activity may contain the following: Internet or other electronic network activity information including, but not limited to, browsing history and search history (e.g., your browsing and search history using our networks, applications, devices, computers or communications equipment)

Purpose(s) for Collection

We may collect browsing history, search history, and other information regarding your interaction with our systems or other sites, applications, or content

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information is not otherwise disclosed to third parties

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled

Category of Personal Information:

Imprecise Geolocational

Examples

Imprecise Geolocational may contain the following: state, city, or area code of home address provided

Purpose(s) for Collection

Providing human resource management services, including hiring, retention, and termination of employees.
Complying with legal obligations and reporting requirements.

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information is not otherwise disclosed to third parties

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled

Category of Personal Information:

Sensory Information

Examples

Sensory Information may contain the following: audio, electronic, visual, and similar information

Purpose(s) for Collection

Providing human resource management services, including hiring, retention, and termination of employees.
Complying with legal obligations and reporting requirements.

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information is not otherwise disclosed to third parties

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled

Category of Personal Information:

Professional Information

Examples

Professional Information may contain the following: Professional or employment-related information (e.g., employment history)

Purpose(s) for Collection

Determining eligibility for initial employment, including the verification of references and qualifications

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information is not otherwise disclosed to third parties

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled.

Category of Personal Information:

Educational Information

Examples

Educational Information may contain the following: Education information (e.g., level of education, schools and colleges attended, etc.)

Purpose(s) for Collection

Determining eligibility, if applicable, for initial employment, including the verification of references and qualifications

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information is not otherwise disclosed to third parties

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled.

Category of Personal Information:	
	Inferences
Examples	
	Inferences may contain the following: Not applicable
Purpose(s) for Collection	
	We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Targeted Advertising	
	We do not engage in targeted advertising or disclose this information for targeted advertising purposes
Sale	
	This information is not sold to third parties
Other Disclosures	
	This information is not otherwise disclosed to third parties
Retention Period	
	Not applicable

Categories of Sensitive Personal Information

The table below outlines the categories of Sensitive Personal Information Global Uprising, PBC d/b/a Cotopaxi collects about Employees, Contractors, and Applicants and whether they are disclosed to third parties.

We collect Sensitive Personal Information from the following sources:

- Directly from our Employees, Contractors, and Applicants
- From our business partners (“business partners” are companies that we have a pre-existing commercial relationship with)

- From our advertising partners
- From data brokers (“data brokers” are companies engaged in the business of buying or collecting Personal Information and selling it to other businesses)

Category of Sensitive Personal Information:	
Government ID Information	
Examples	
Government ID Information may contain the following: Social Security number, driver's license number, and other government ID information used for completing I-9 form	
Purpose(s) for Collection	
Complying with legal obligations for the provision of employment	
Targeted Advertising	
We do not engage in targeted advertising or disclose this information for targeted advertising purposes	
Sale	
This information is not sold to third parties	
Other Disclosures	
This information is not otherwise disclosed to third parties	
Retention Period	
Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled.	

Category of Sensitive Personal Information:

Sensitive Category Information

Examples

Sensitive Category Information may contain the following: race and ethnicity; religion; citizenship or immigration status; disability or health information; sensitive household information in the form of beneficiary and emergency contact information, which may include the Personal Information of minors or dependents or a partner and their relationship to the HR Subject

Purpose(s) for Collection

Providing human resource management services, including hiring, retention, and termination of employees; processing payroll, benefits, and insurance and related human resource support activities; providing accommodations and leaves of absence; administering diversity, equity, and inclusion programs; complying with legal obligations, such as reporting and work authorization verification

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information may be disclosed to Processors. We disclose Sensitive Category Information to enable our Processors to provide services on the business' behalf, such as providing payroll, benefits, and training services.

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled

Category of Sensitive Personal Information:

Financial Information

Examples

Financial Information may contain the following: Bank account number and details; company-issued payment card information, including transaction records; company compensation history; and tax-related information

Purpose(s) for Collection

Facilitating compensation (such as for direct deposits) and expense reimbursement, processing financial transactions; for tax withholding purposes, and for security and fraud prevention

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information may be disclosed to Processors. We disclose Financial Information to enable our processors to process compensation and reimbursements as well as to process other financial transactional and tax withholding activities, and to enable our processors to provide for security and fraud prevention.

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled

Category of Sensitive Personal Information:

Biometric Information

Examples

Biometric Information may contain the following: images of your fingerprint, iris, or face; and your voiceprint

Purpose(s) for Collection

Providing for biometric security access

Targeted Advertising

We do not engage in targeted advertising or disclose this information for targeted advertising purposes

Sale

This information is not sold to third parties

Other Disclosures

This information may be disclosed to Processors. We disclose Biometric Information to enable our processors to run biometric security software protecting access to certain systems or locations.

Retention Period

Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled.

Category of Sensitive Personal Information:	
Precise Geolocation Information	
Examples	
Precise Geolocation Information may contain the following: geolocation features on your device, including your IP address, used for completing I-9 form remotely	
Purpose(s) for Collection	
Complying with legal obligations for the provision of employment	
Targeted Advertising	
We do not engage in targeted advertising or disclose this information for targeted advertising purposes	
Sale	
This information is not sold to third parties	
Other Disclosures	
This information is not otherwise disclosed to third parties	
Retention Period	
Data is deleted upon request by the data subject if all related compliance and legal obligations to retain the data have been fulfilled.	

Use of Personal Information

We use Personal Information for the purposes described above. Other examples of how we may use your Personal Information within Global Uprising, PBC d/b/a Cotopaxi include:

- Publishing Employees’ work contact information in an intra-company directory for other Employees to view.
- Disclosing applicants’ submitted Personal Information with our HR department and other employees to process applications.

- Creating profiles of contractors' performance based on work product.

Personal Information may also be used or disclosed as otherwise permitted or required by applicable law.

Disclosing Personal Information

We disclose Personal Information to the following categories of third parties:

- Processors (also referred to as "Service Providers" or "Contractors" in California law): We use processors to securely handle Personal Information on our behalf for our business purposes and only on our instructions. California privacy laws and our contracts with these companies prevent them from using your Personal Information for their own purposes.
- Affiliates: We may disclose your information to our affiliates, subsidiaries, and representatives as part of our relationship with you.
- Other Employees, Contractors, and Applicants: Content you post on our systems may be displayed to other Employees, Contractors, and Applicants as appropriate.
- Our Business Partners: We may disclose relevant Personal Information to our business partners, for example to provide you with offers and discounts for products and services that may interest you.

See the tables above for more details about how different categories of Personal Information are disclosed.

We do not sell Personal Information to anyone. We do not share Personal Information for advertising purposes.

Exercising Your Personal Information Rights

California Employees, Contractors, and Applicants have the following rights under California privacy laws:

- The right to know the Personal Information we have collected about them, including the categories of sources from which we collected the Personal Information, the purpose(s) for collecting, selling, or sharing your Personal Information, and the categories of third parties to whom we have disclosed your Personal Information;
- The rights to correct, or delete Personal Information;
- The right to limit the use of Sensitive Personal Information in certain circumstances;
- The rights to opt out of targeted advertising, sales of Personal Information, or profiling; and
- The right not to receive discriminatory treatment for exercising their privacy rights.

If you are a California Employee, Contractor, or Applicant, you can submit a request to exercise your Personal Information rights under California privacy laws by emailing legal@cotopaxi.com and/or peopleops@cotopaxi.com.

To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will verify your identity by taking steps to verify your identity before granting you access to your personal information or complying with your request. We may verify your identity by requiring you to sign into your Cotopaxi account. If you do not have a Cotopaxi account and you request access to, correction of or deletion of your personal information, we may require you to provide certain information to verify your request. In addition, if you

do not have a Cotopaxi account and you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the HR Covered Individual whose personal information is the subject of the request. We may ask you for additional information as part of this process, including the last 4 digits of your telephone number. If you do not complete the verification process, we may be unable to process your request. Any information you provide to authenticate your identity will only be used to process your rights request and not for any other purpose. Please be aware that we do not accept or process rights requests submitted through other means.

We will respond to your rights request within 45 days (or 15 days for requests to opt-out of the sale of Personal Information, requests to opt-out of targeted advertising, and requests to limit the use of Sensitive Personal information), though in certain cases we may inform you that we will need up to another 45 days to act on your request. If we suspect fraudulent or malicious activity on or from your account, we will delay taking action on your request until we can appropriately verify your identity and the request as authentic. Also note that each of the rights are subject to certain exceptions.

We reserve the right to decline to process, or charge a reasonable fee for, requests from an Employee, Contractor, or Applicant that are manifestly unfounded, excessive, or repetitive.

Notice of Right to Limit the Use of Sensitive Personal Information

You have the right to limit some uses of Sensitive Personal Information. In general, you may direct companies not to use Sensitive Personal Information except as necessary to provide goods or services you have requested or other exempt purposes.

However, we only use Sensitive Personal Information for purposes that are exempt from this right, such as to provide you with goods or services you have requested, to detect and prevent security incidents, or verifying the quality of our goods and services. The full list of these exempt purposes is specified in California Code of Regulations, Title 11, Section 7027(m).

Children's Data

We do not knowingly sell or share for targeted advertising the Personal Information of California residents under 16 years of age.

We comply with the Children's Online Privacy Protection Act ("COPPA"), in addition to California privacy law, with respect to any Personal Information we collect or use from children under the age of 13.

Authorized Agent Requests

California privacy law allows you to designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by following the same method described above. We may require verification of your authorized agent in addition to the information for verification above for Employees, Contractors, and Applicants and households.

Contact Us

If you have any questions or concerns regarding this California HR Privacy Notice, contact us at legal@cotopaxi.com.

Last updated: December 4, 2023