

Evan-Moor

Privacy Notice for California Job Applicants, Employees, and Independent Contractors

Please review the terms of the privacy notice set forth below carefully. This privacy notice was updated January 1, 2023.

1. Our Commitment to Your Privacy

At Evan-Moor Educational Publishers, your privacy and the protection of your personal information is our priority. Evan-Moor complies with the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act (“CPRA”), which create consumer rights, including rights for employees who are California residents relating to the access to, deletion of, and sharing of personal information that is collected by businesses.

2. California Consumer Privacy Act/California Privacy Rights Act

The California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act (“CPRA”) set forth specific obligations for businesses processing personal information of California residents, including employees. Pursuant to the CCPA and the CPRA, Evan-Moor is required to provide its employees who are California residents (“California Residents”) a notice that identifies the categories of personal information that may be collected, and why Evan-Moor collects that information.

This California Employee Privacy Notice (“Notice”) is intended to notify you of our privacy practices as required by the CCPA and the CPRA.

This Notice applies only to individuals residing in the State of California who are considered consumers – namely, job applicants, employees, and contractors of Evan-Moor – from whom we collect “Personal Information” as set forth in this Notice.

3. What Personal Information Does Evan-Moor Collect about California Employees/Job Applicants/Independent Contractors?

Listed below are the categories of personal information that Evan-Moor has or may have collected and processed about employees, job applicants, and independent contractors in the twelve (12) months preceding January 1, 2023. We may collect personal information from you in a variety of ways including, but not limited to, on our website, your mobile device, through email, in physical locations, in person, through the mail, and over the telephone.

Identifiers:

- Name
- Alias
- Signature
- Postal address
- Unique personal identifiers

- Physical characteristics or description
- Email address
- Telephone number
- Names of children
- Name of spouse or domestic partner
- Other information that identifies, relates to, describes, or is capable of being associated with, a particular individual.

A “unique personal identifier” is a persistent identifier that can be used to recognize an employee, or a device that is linked to an employee, over time and across different services, including, but not limited to, a device identifier, an Internet Protocol address, cookies, beacons, pixel tags, or similar technology; unique pseudonym or user aliases; telephone numbers; or other forms of persistent identifiers.

Internet or Other Electronic Network Activity Information on Work Devices:

- Browsing history
- Search history
- Information regarding an employee’s interaction with an internet website, application, or advertisement
- Geolocation data related to use of an internet website, application, or physical access to an Evan-Moor office location.

Professional or Employment-Related Information:

- Job related data
- Data on a job application or resume/CV
- Job titles
- Work history
- Work dates and locations
- Professional memberships
- Work samples
- Job preferences
- References
- Background screening results
- Qualifications
- Experience
- Employment contracts
- Contractor agreements
- Performance reviews
- Disciplinary records
- Photos
- Biometric data including imagery of employee fingerprints, face, and voice recordings
- Information about employee expenses
- Payroll and benefits related data

- Internal and external contact information.

Education Information:

- Institutions attended
- Education records
- Degrees
- Certifications
- Report cards
- Transcripts that are not publicly available.

Inferences:

- Information drawn from any of the personal information categories referenced above to create a profile about an employee.

4. Sensitive Personal Information

Evan-Moor may also collect or process sensitive personal information as necessary to allow us to carry out your instructions, to manage and operate our business, and to comply with Evan-Moor's legal and regulatory obligations:

- Username and password
- Date of birth
- Place of birth
- Financial, account, or billing information, including tax identification number, social security number, or credit/debit card information
- Proof of identification, including driver's license number or state/national government-issued identification
- Passport number
- Insurance policy number
- Bank account number
- Medical information
- Health insurance information
- Life insurance information
- Audio, electronic, visual, thermal, olfactory, or similar information such as telephone recordings, temperature
- Diversity or demographic information, including the following:
 - Race
 - Color
 - National origin
 - Religion
 - Sex
 - Gender
 - Gender identity

- Gender expression
- Sexual orientation
- Marital status
- Medical condition
- Genetic characteristics
- Military or veteran status
- Mental or physical disability
- Request for family care leave
- Request for leave related to an employee's own serious health condition
- Request for pregnancy disability leave
- Age
- Information Evan-Moor has contractually agreed to manage under heightened confidentiality and security protocols, such as health and financial information or intellectual property
- Information required to conduct background checks.

5. Methods of Collecting Your Personal Information and Sensitive Personal Information

- We may collect information directly from you from, for example, forms you complete.
- We may collect information indirectly from you by, for example, observing your actions on the Evan-Moor website.
- We may collect information from third parties, including recruiters who submit your information to us for an employment position, consumer reporting agencies for employment background checks, referrals you have listed on your job application, third parties such as banks or financial advisors (with your consent), from our website, or through the use of Cookies.

6. To Whom Does Evan-Moor Sell Your Personal Information and Sensitive Personal Information?

- Evan-Moor does not sell your personal information or your sensitive personal information.

7. With Whom Does Evan-Moor Share Your Personal Information and Sensitive Personal Information?

For the purposes set forth below at section 8, Evan-Moor shares your personal information and/or sensitive personal information with the following:

- Health insurance administrator
- Payroll company
- Certified Public Accountant related to payroll
- Consumer Reporting Agencies conducting background checks
- Evan-Moor Human Resources Department
- Government entities when required by law.

8. Purposes for Collecting Your Personal Information and Sensitive Personal Information

Evan-Moor collects the personal information and sensitive personal information identified in Sections 3 and 4, above, for the following reasons:

- To consider job applications.
- To recruit employees, including to conduct employment related background checks and screening.
- To meet the purpose for which information is provided. For example, if a job applicant shares information in applying for a job with Evan-Moor, we will use that Personal Information in connection with the individual's employment or employment application.
- To provide human resources management services including, but not limited to, hiring, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing relations with independent contractors, providing employee training and development, undertaking internal research, termination, separation, payroll, expense reimbursement, and other functions related to employment or potential employment with Evan-Moor.
- To communicate with applicants/employees throughout the recruitment and hiring process.
- To contact applicants/employees, including to provide information about benefits or information relating to employment or a job application.
- To contact references.
- To schedule and manage interviews.
- To evaluate applicants/employees for current and future job opportunities.
- To make hiring decisions.
- To initiate onboarding if an individual receives and accepts an offer.
- For internal analysis to improve recruitment and hiring efforts, including around diversity and inclusion.
- To detect security incidents and protect against deceptive, fraudulent, or illegal activity.
- To debug and repair errors that impair existing functionality of internal resources, networks, and databases.
- To share with service providers, including technology providers, agencies and/or external recruiters.
- To fulfill a legal obligation pursuant to law, regulation and/or lawful order.
- For business transaction purposes.
- To comply with state and federal law including, but not limited to, tax reporting requirements of the Internal Revenue Service, Franchise Tax Board, Employment Development Department.
- To administer benefits including, but not limited to, medical, dental, vision, and retirement benefits, including recording and processing eligibility of dependents, monitoring of absences and leaves of absence, and insurance and accident management.
- To compensate employees including salary and wage administration, payroll management, reimbursement of expenses, administering other compensation related payments including determining bonus payments, if any.

- To conduct performance related reviews including, but not limited to, doing performance appraisals, monitoring skills, determining disciplinary actions, assessing demotions and promotions, deciding on pay scales, restructuring staff.
- To monitor work related licenses and credentials including providing software licenses for use in the course of an employee's work related responsibilities, ensuring legal and regulatory compliance, training, examination, and other requirements are met.
- To maintain applicant and employee information including, but not limited to, securing personnel files, emergency contact information, customizing and securing employee information or accounts with Evan-Moor.
- To monitor eligibility to work in the United States in accordance with the U.S. Immigration and Nationality Act.
- To identify health needs of employees to plan and provide appropriate services, including administering sick leave and leave of absence policies and procedures.
- To facilitate a better working environment, including conducting staff surveys and training.
- To ensure a safe and efficient working environment including related to disciplinary actions, enforcing the Evan-Moor code of conduct, and conducting workplace investigations.
- To support and develop Evan-Moor's website including services relating to employment or employment application.
- To provide support, including to respond to inquiries, to investigate and address concerns, and to monitor and improve our responses.
- To maintain security on the Evan-Moor website including hosting and maintenance of computer systems and infrastructure; managing Evan-Moor's software and hardware computer assets; systems testing; training; and monitoring email and internet access.
- To comply with applicable law or regulatory requirements such as legal (state and federal) and internal company reporting obligations and record retention requirements.

9. How Evan-Moor Protects Your Personal Information and Sensitive Personal Information.

Evan-Moor processes and protects your personal information and sensitive personal information by maintaining electronic, physical, and procedural safeguards. We use computer safeguards such as data encryption; we enforce physical access controls to our buildings and files; and we authorize access to your personal information and sensitive personal information only for those employees who require it to fulfill their job responsibilities.

10. Your Rights Regarding Personal Information and Sensitive Personal Information

- **Right of Access:** You have the right to access personal and/or sensitive personal information which Evan-Moor may collect or retain about you. If requested, we shall provide you with a copy of the personal information or sensitive personal information which we collect as permitted by the CCPA/CPRA.
- **Right to Know:** You have the right to request that we disclose the following about your personal information and/or sensitive personal information:

- The specific personal information or sensitive personal information we may collect
 - The categories of personal information or sensitive personal information we may collect;
 - The categories of sources from which we may collect your personal information or sensitive personal information;
 - The business purpose(s) for collecting or sharing your personal information or sensitive personal information;
 - The categories of personal information or sensitive personal information we may disclose for business purposes;
 - The categories of third parties with whom we may share your personal information or sensitive personal information.
- **Sale of Personal Information or Sensitive Personal Information:** Evan-Moor does not sell personal information or sensitive personal information within the meaning of the CCPA/CPRA.
 - **Sharing/Disclosure of Sensitive Personal Information.** You have the right to limit how your sensitive personal information is disclosed or shared with third parties, as defined in the CCPA/CPRA unless otherwise provided by law.
 - **Right to Deletion.** In certain circumstances, you have the right to request the erasure of your personal information or sensitive personal information. Upon verifying the validity of a deletion request, we will delete your personal information or sensitive personal information from our records, and instruct any service providers or third parties to delete your information, when applicable. The right to deletion does not extend to personal information and sensitive personal information that Evan-Moor is legally required to maintain.
 - **Right to Correct/Right to Rectification.** In certain circumstances, you have the right to request correction of any inaccurate personal information or sensitive personal information. Upon verifying the validity of a verifiable consumer correction request, we will use commercially reasonable efforts to correct your personal information or sensitive personal information as directed, taking into account the nature of the personal information or sensitive personal information and the purposes of maintaining your personal information or sensitive personal information.
 - Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.
 - The above requests may be made by calling 1-800-777-4362 or emailing abuse@evan-moor.com.

11. Non-Discrimination

If you are a California resident, you can exercise any of your rights as described in this Notice and under applicable privacy laws by using the contact information provided in this Notice. We will not discriminate against you for exercising such rights.

12. Verifying Requests.

When you make a request to us, we will require your name, e-mail, phone number, and address. We will attempt to match our records based on that information. Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm their identity.

13. Timelines for Responding to Requests

No later than ten (10) days after receiving a request set forth in section 10, herein, Evan-Moor will confirm receipt of the request and provide information about how it will process the request. Evan-Moor will respond to requests no later than forty-five (45) calendar days after receiving the request. If additional time is needed to respond, we will provide notice and an explanation and will request up to an additional forty-five (45) calendar days to respond. If we are unable to verify the individual making the request, Evan-Moor may deny the request.

14. Updates

This Notice will be updated at least once every twelve (12) months to reflect changes in Evan-Moor's business, legal, or regulatory obligations. Please check this Notice periodically for changes. Evan-Moor will not collect additional categories of your personal information or sensitive personal information, or use your personal information or sensitive personal information already collected for additional purposes without providing you with a notice of our intent to do so.

15. Retention Policy

Evan-Moor retains your personal information and sensitive personal information for a reasonably necessary period of time. When state or federal law specify record retention requirements for certain records, Evan-Moor complies with those laws.

16. Use of Cookies and Online Behavior

In some portions of the website, so-called "cookies" are used in order for us to improve the efficiency of your individual use of the website and to enhance your browsing experience. Cookies are identifiers that our server may send to your computer in order to identify the computer being used for the duration of the session. Most browsers are set up to accept these cookies automatically. In addition, you can deactivate the storing of cookies or adjust your browser to inform you before the cookie is stored on your computer. If you disable cookies, some features may be disabled, and some of our services may not function properly. We may also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

In order to track web site usage, we use Google Analytics, which does not allow the collection of personal identifiable information. For information on Google Analytics, [click here](#). You can opt out of making your site activity available to Google Analytics by installing the [Google Analytics opt-out browser add-on](#).

Questions

If you have questions regarding this Notice or about your rights regarding your Personal Information or Sensitive Personal Information, or if you have concerns about the safety or possible misuse of your Personal Information or Sensitive Personal Information, please contact us by email at abuse@evan-moor.com.