

PRIVACY, SECURITY AND TRANSPARENCY

Thank you for visiting Full Steam Staffing's online and mobile resources, and for viewing this privacy statement. Our privacy statement, contained in the pages that follow, serves to give notice about the types of personal information we collect, how we use it, who we share it with and why, and what we do to try to protect it. We delve into those matters in a fair amount of detail in the pages that follow. We encourage you to read them carefully. In the meantime, we provide a quick overview below.

Summary of how we handle Personal Information

- **What do we collect?**

We collect and retain certain personal information from four different groups of data subjects encompassing: our workforce, vendors, customers and those who visit and use our online and mobile resources. Our privacy statement applies mostly to that last group, from which we collect very little information unless it is voluntarily submitted to us. You can read [here](#) to learn about the categories of personal information we collect from all four groups of data subjects.

- **Why do we use it?**

We use personal information received from visitors and users of our online and mobile resources to complete their transactions, communicate directly with them, update them on services and benefits, and personalize the online and mobile resources for them. We provide further detail about our use of personal information [here](#).

- **When do we share it?**

We share personal information when needed to fulfill our legal obligations and when our vendors need it to perform under the contracts we have with them. We provide further detail about our sharing of personal information [here](#). We do not sell or rent any personal information from any group of data subjects to third party data brokers or marketing companies.

- **How do we protect it?**

We've invested in a Security Program that addresses both technical and operational matters. Our program includes an incident response and management and vendor oversight components. You can read about those components [here](#) and [here](#).

- **Your Privacy Choices and Rights**

You do not have to provide personal information to enjoy the features of our online and mobile resources. Moreover, you can opt out of certain activities like newsletters and announcements. You can learn more about that [here](#). Residents of California have certain additional rights. You can read about those rights [here](#).

Contacting Our Privacy Office

If you have any questions about our privacy and data security policies, procedures and practices, including anything we say in this privacy statement, we encourage you to contact our Privacy Office.

- **Address**
Full Steam Staffing
Attn: Privacy Office
2121 S. Haven Avenue
Suite 100
Ontario, CA 91761
- **Email:** privacy@fullsteamstaffing.com
- **Phone:** 909-947-3755

This privacy statement was amended as of July 1, 2020 and is effective as of that date. The English language version of this privacy statement is the controlling version regardless of any translation you may attempt.

NAVIGATING THROUGH THIS STATEMENT

You can use the links below to navigate to areas of this statement that apply specifically to you, or which may otherwise be of interest:

[Some Important Vocabulary](#)
[What Personal Information Do We Collect?](#)
[How Do We Use the Personal Information We Collect?](#)
[When/With Whom Do We Share Personal Information?](#)
[How Do We Protect Collected Personal Information?](#)
[Your Rights And Options](#)
[Children's Privacy](#)
[The California Consumer Privacy Act](#)
[Submitting Information from Outside the U.S.](#)
[Changes To This Privacy Statement](#)
[Contacting Us](#)

SOME IMPORTANT VOCABULARY

Although not itself a contract, this privacy statement is an important document that explains how we address some of our legal obligations, and your related legal rights, involving personal information. Clarity is, therefore, important. We'll use this section to let you know about some words that have special meanings whenever you see them in this statement. Let's start with the word "**statement**" itself: when we reference "**this statement**", "**this privacy statement**" and "**our statement**", we mean the Privacy Statement you are reading now. Wherever we say "**Full Steam**", "**we**", "**us**", or "**our**", we mean Full Steam Staffing LLC. We use the words "**you**" and "**your**" to mean you, the reader, and other visitors to our online and mobile resources who are, in all cases, over the age of 18. This age requirement is discussed in more detail later in this statement [here](#).

When we talk about our "**online and mobile resources**", we mean all websites, portals or other features we operate to allow you to interact with us and our systems, as well as the mobile apps we've created and distributed to let you interact with the content we provide. An "**affinity action**" is when you "follow" us, "like" us or take a similar or analogous action on our external social media presence. As described [here](#), we have a broad array of legal obligations to protect your personal information. So when we use the term "**vendors**" we mean it to include all analogous terms under the data privacy and security laws applicable to us such as "service providers" under the California Consumer Privacy Act ("**CCPA**").

Finally, and perhaps most importantly, when we refer to "**personal information**", we mean information that can be used to identify or easily be linked to you. The privacy laws in some jurisdictions include unique elements in what they consider to be the personal information of the data subjects they protect. If those laws apply to us, as in the case of the CCPA, then, when the context requires, our use of the phrase "personal information" includes the unique elements required by such laws.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect personal information from four groups of data subjects:

- visitors to, and users of, our online and mobile resources
- current members of our workforce and those who apply for posted jobs
- our third party vendors
- our customers (both corporate customers and those applicants looking to be placed at open positions with our corporate customers)

The categories of information we collect from each of these groups differs. As you may have noticed, it's possible that the same person could fall into more than one group. For instance, someone who is a customer might also work for one of our vendors. Or someone who works for us might, on their day off, visit

one of our general websites. We explain below the different categories of personal information we collect from each group of data subjects.

Visitors and Users of our Online and Mobile Resources

If you visit and/or use our online and mobile resources, we collect and retain a very limited amount of personal information through automated/technical means. We describe that automatic collection [here](#). In addition, if you choose to participate in, or make use of certain activities and features available via our online and mobile resources, you will need to provide us with information about yourself. We describe that type of voluntary submission immediately below. ***By using our online and mobile resources, you are signifying to us that you agree with this section of our privacy statement and that we may use and disclose your information as described.***

Voluntarily Submitted Information.

Here are some of the ways you voluntarily give us your personal information. The types of personal information you will be submitting to us in these situations is almost always limited to **identifiers** such as your name, email address, mailing address and phone number. You can read about how we use that personal information [here](#).

- **Emails and Online Forms** – If you choose to send us an email or fill out an online form from our “contact us” link or a similar link, you will be giving us your email address and any other personal information that may be in your message or attached to it.
- **Applying Online and Creating an Account** – In order to apply for an open position with one of our corporate customers, you will need to create an account and provide us with some basic identifiers such as your name, email address and phone number, **professional or employment related personal information** that is contained on your resume or other documentation you upload and any other personal information that is contained on such documentation as well. The same is true if you sign up to receive a newsletter or other informational or marketing material we publish.
- **Applying for an Open Position at Full Steam** – When you send us an email to apply for an open position with us and not one of the open positions with our customers, you will be giving us identifiers such as your name and email address along with any other personal information that may be in your message or attached to it such as **professional or employment related personal information** found on your resume.
- **Registering for Events** – When you register for events, conferences or programs we ourselves may host (rather than outsource to a third party event manager with its own privacy policies), you will be submitting the types of identifiers described above. If the event requires a fee, we may also ask you to submit **credit card or other financial information**.
- **Social Media and Community Features** – Some of our online and mobile resources may offer social media-like community features letting users post or upload messages, comments, and/or image or other files and materials. If you choose to make use of these features the information you post, including your screen name and any other personal information, will be in the public domain and **not covered/protected by this statement**.
- **Customer Portals** – Some of our online and mobile resources are used to help us serve our customers. We discuss personal information submitted in those situations elsewhere in this statement such as [here](#).

If you prefer we not receive the above-described personal information, please don't submit it. This means you shouldn't participate in the applicable activities on, or use the applicable features available from our

online and mobile resources. Such participation and use is strictly your choice. By not participating, you may limit your ability to take full advantage of the online and mobile resources, but most of the content in our online and mobile resources will still be available to you.

Automatically Collected Information.

When you visit or use our online and mobile resources, **basic information about your internet/electronic activity** is automatically collected through your browser via tracking technologies, such as “cookies.” As just about everyone knows by now, cookies are small text files downloaded onto your computer or mobile device. Cookies allow us to collect your **IP address** and recognize your computer or mobile device and store some information about your preferences for using our online and mobile resources or past actions, such as:

- the type of browser and operating system you use
- the date and time and length of your visit
- the pages visited, graphics viewed and any documents downloaded
- links to other sites you accessed from our online and mobile resources or used to navigate to our online and mobile resources

Additional information about cookies and tracking technologies is available [here](#).

If you access our online and mobile resources from a phone or other mobile device, the mobile services provider may transmit to us certain information such as uniquely identifiable mobile device information. That, in turn, allows us to collect **mobile phone numbers and associate them with the mobile device identification information**. Some mobile phone service providers also operate systems that pinpoint the physical location of devices and we may receive this **geolocation data** as well.

Finally, when you use our online and mobile resources, we may allow third party service providers to place their own cookies or similar technologies in order to engage in the same types of collection we describe above. For example, we use third party “web analytics” services such as those offered by Google Analytics. For more information on how Google specifically uses this data, go to www.google.com/policies/privacy/partners/. You can learn more about how to opt out of Google Analytics by going to <https://tools.google.com/dlpage/gaoptout>.

User Beware: External Sites, Apps, Links and Social Media.

We maintain a presence on one or more external social media platforms such as Twitter, Facebook, YouTube and LinkedIn. We may further allow [the community features](#) of our online and mobile resources to connect with, or be viewable from, that external social media presence. Similarly, our online and mobile resources may contain links to other websites or apps controlled by third parties.

We are not responsible for either the content on, or the privacy practices of, social media platforms, or any third party sites or apps to which we link. Those apps, sites and platforms are not controlled by us and therefore have their own privacy policies and terms of use. **To be clear: neither this statement nor the terms of use appearing on or in any of our online and mobile resources apply to our social media presence or any third party sites or apps to which we may link.** That means even if you take an [affinity action](#) on our specific social media presence, and identifiers about you are automatically collected and given to us as a result, that collection and transfer is governed by the privacy policies and other terms of the applicable social media platform and are not our responsibility. If you have questions about how those apps, sites and platforms collect and use personal information, you should carefully read their privacy policies and contact them using the information they provide.

Personal Information we collect from our Corporate Customers

Typically, the categories of personal information collected from our corporate customers will be limited to what is often referred to as “**minimum business contact information**” such as name, business title, business address and business email. As a result, if legally required, we make a reasonable effort to provide notice at the point of collection, or address the question of notice in the applicable contract with our corporate customer.

Personal Information we collect from Job Seekers to our Corporate Customers

For those job seekers who apply for open positions with our corporate customers, we collect the categories of personal information described [here](#), which includes identifiers, professional and employment related information and any other personal information included in the documents provided by such job seekers.

Personal Information we collect from our Workforce and Job Applicants

We collect and retain the types of **professional or employment related personal information** you would expect a U.S. employer to have about its U.S. workforce such as name, age, home address, and personal information for payroll, tax and benefits. When the law allows or requires (such as for compliance with equal opportunity/non-discrimination laws) we may also collect **characteristics of protected classifications** such as race, gender, and ethnicity. Similarly, when someone applies for an open job position, including via portals or other online and mobile resources, we collect the personal information we need, and which the law allows, to evaluate their applications.

We provide notice of what personal information we collect from our workforce/applicants in our confidential human resources manuals and other documentation, or on the proprietary apps and portals we operate for such purpose doing so via confidential Full Steam terms and conditions published thereon. In some cases, portals and apps may be operated by third parties who transfer the personal information to us. In those situations, the legal responsibility to provide notice usually rests with the third party, not Full Steam. You can read about how we use the personal information we collect from our workforce and job applicants [here](#).

Personal Information we collect from Vendors

Like all corporate enterprises, we buy goods and services, lease equipment and office space and attend industry events. In doing so, we interact with many existing and potential vendors from whom we necessarily collect certain personal information in connection with our contractual and business relationships. Typically, the categories of personal information collected in those cases will be limited to minimum business contact information. As a result, if legally required, we make a reasonable effort to provide notice at the point of collection, or address the question of notice in the applicable business contract.

HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT?

We use personal information we collect only in the manner and through the means allowed by applicable law. That means we determine whether we have a lawful basis/legitimate business purpose to use your personal information before doing so. As stated in applicable law, such lawful bases/legitimate business purposes include receiving express consent, operating our business, performing a contract, and complying with a legal obligation. More specifically, we use the personal information of [each group of data subjects](#) as follows:

Visitors and Users of our Online and Mobile Resources

We use the automatically collected personal information described [here](#) to compile generic reports about popular pages/features of our online and mobile resources, and to see how users are accessing our online and mobile resources and in some cases (such as [affinity actions](#)) send materials to you. We use the personal information you voluntarily submitted, as described [here](#), to respond back directly to you and/or send you the information you requested or about which you inquired. From time to time, we may also use your information to contact you for market research or to send you information on our services that we think may be of interest to you but we will always give you the opportunity to opt-out of receiving such direct marketing or market research communications. We also may use any such personal information you provide to customize our programs and newsletters to make them more relevant to you. We do not sell or rent personal information automatically collected by, or which you voluntarily provide when using our online and mobile resources.

Our Corporate Customers

We use personal information collected from our customers to perform under our contracts with them. As mentioned above, customers enter into confidential contracts with us and those contracts have their own terms and conditions describing the manner and means of our use of customer personal information. As a

result, those terms and not this statement, apply to our use of the personal information of our corporate customers.

Job Seekers to our Corporate Customers

We use personal information collected from job seekers to our corporate customers in order to process their application and evaluate their work history, skills and understand the type of job they are looking for. We then use that information match a job seeker with any open jobs with our corporate customers in their area.

Our Workforce and Job Applicants

We use personal information collected from our workforce to operate our business, perform our duties as an employer, and fulfill our commitments to workforce members (such as benefits administration). We use personal information collected from job applicants to evaluate their candidacy and process their applications. We describe our use of workforce and job applicant personal information in greater detail in confidential Full Steam human resource policy documents or by publishing such policies on the proprietary workforce/applicant portals and apps we operate.

Vendors

We use the personal information collected from our vendors (which, again, is largely minimum business contact information) to manage, administer and perform under our contracts with them, or share information about our services. We also may from time-to-time use personal information about their individual personnel to perform background checks on those who are provided access to our facilities or technology networks so that we can help protect the personal information of others stored thereon. We describe our use of vendor personal information in greater detail in our confidential contracts with those parties.

WHEN/WITH WHOM DO WE SHARE PERSONAL INFORMATION?

We may share your personal information as described below. This sharing applies to the personal information of all four groups of data subjects described [here](#).

Affiliates

We may share personal information with other corporate affiliates who will use such information in the same way as we can under this statement.

Legal Requirements

We may disclose personal information to government authorities, and to other third parties when compelled to do so by such government authorities, or at our discretion or otherwise as required or permitted by law, including responding to court orders and subpoenas.

To Prevent Harm

We also may disclose such information when we have reason to believe that someone is causing injury to or interference with our rights or property, or harming or potentially harming other persons or property.

Business Sale/Purchase

If Full Steam sells or transfers all or substantially all of its assets, equity interests or securities, or is acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, divestiture, consolidation, or liquidation, personal information may be one of the transferred assets.

Vendors

We also share personal information with those of our vendors who need it to perform under the contracts we have with them. As part of our [Security Program](#), we have adopted standards for those vendors who receive personal information from us. We attempt to bind such vendors to those standards via written

contracts. Such standards include expectations that when we share personal information with our vendors, they will comply with all applicable privacy and data security laws and regulations and our Security Program, and will contractually require and cause their subcontractors and agents to do the same.

Please note, however, that we cannot guarantee that all of our vendors will agree to the above-described contractual requirements; nor can we ensure that, even when they do agree, they will always fully comply.

HOW DO WE PROTECT COLLECTED PERSONAL INFORMATION?

Our Data Security Program

We have adopted, implemented and maintain an enterprise-wide corporate information security and privacy program that includes technical, organizational, administrative, and other security measures designed to protect, as required by applicable law (including all those described above), against reasonably anticipated or actual threats to the security of your personal information (the “**Security Program**”). We have every reason to believe our Security Program is reasonable and appropriate for our business and the nature of foreseeable risks to the personal information we collect. We further periodically review and update our Security Program, including as required by applicable law.

Our Incident Response and Management Plan

Despite the investment we’ve made in, and our commitment to, the Security Program including enforcement of our third party [oversight procedures](#), we cannot guarantee that your personal information, whether during transmission or while stored on our systems, otherwise in our care, or the care of our vendors, will be free from either failed or successful attempts at unauthorized access or that loss or destruction will never occur. Except for our duty to maintain the Security Program under applicable law, we therefore necessarily disclaim, to the maximum extent the law allows, any other liability for any such theft or loss of, unauthorized access or damage to, or interception of any data or communications including personal information.

All that said, as part of our Security Program, we have specific incident response and management procedures that are activated whenever we become aware that your personal information was likely to have been compromised. Those procedures include mechanisms to provide, when circumstances and/or our legal obligations warrant, notice to all affected data subjects within the timeframes required by law, as well as to give them such other mitigation and protection services (such as the credit monitoring and ID theft insurance) as may be required by applicable law. We further require, as part of our vendor and business partner oversight procedures, that such parties notify us immediately if they have any reason to believe that an incident adversely affecting personal information we provided to them has occurred.

YOUR RIGHTS AND OPTIONS

If we are using your personal information to send you marketing materials, such as newsletters or product alerts via text or email, you may opt out by following the opt-out instructions in the email or other communication (e.g., by responding to the text with “STOP”). In addition, certain of our online and mobile resources will provide a centralized opt-out link allowing you to opt out of any programs in which you may have enrolled using that particular online or mobile resource. When we receive your request, we will take reasonable steps to remove your name from our distribution lists, but it may take time to do so. You may still receive materials for a period of time after you opt out. In addition to opting out, you have the ability to access, amend and delete your personal information by contacting us using the contact information below. Opting out of or changing affinity actions or other submissions or requests made on our third party social media platform, will likely require that you do so directly on that platform as we do not control their procedures.

Some browsers have a “do not track” feature that lets you tell websites that you do not want to have your online activities tracked. At this time, we do not specifically respond to browser “do not track” signals.

CHILDREN’S PRIVACY

Federal law imposes special restrictions and obligations on commercial website operators who direct their operations toward, and collect and use information from children under the age of 13. We take those age-related requirements very seriously, and, consistent with them, do not intend for our online and mobile

resources to be used by children under the age of 18, and certainly not by anyone under the age of 13. Moreover, we do not knowingly collect personal information from minors under the age of 18. If we become aware that anyone under the age of 18 has submitted personal information to us via our online and mobile resources, we will delete that information and not use it for any purpose whatsoever. We encourage parents and legal guardians to talk with their children about the potential risks of providing personal information over the Internet.

THE CALIFORNIA CONSUMER PRIVACY ACT

When we collect personal information from California residents we become subject to, and those residents have rights under, the CCPA. This section of our statement is used to allow us to fulfill our CCPA obligations and explain your CCPA rights. Our CCPA obligations do not, however, extend equally to all [groups of data subjects](#) because we are covered by certain explicit statutory exemptions in the CCPA.

Under those exemptions, the full breadth of CCPA obligations apply to us only with respect to California residents who were visitors to, or users of our online and mobile resources or job seekers to our corporate customers. For our workforce/job applicants, our only CCPA obligation is to provide notice of collection, which we do, as already described [here](#). For our vendors and corporate customers, our only CCPA obligation would be to give them the right to opt out of sale of their personal information, but we don't engage in such sales as already described [here](#). As such, this section applies only to those California residents who were visitors to or users of our online and mobile resources or job seekers to our corporate customers and thus for purposes of this section, the words “**you**” and “**your**” mean only those California residents.

What did we collect from California Residents?

We collected from you, within the last 12 months, the categories of personal information already described [here](#). We disclosed this personal information for one or more legal or business purposes as permitted by the CCPA. We urge you to re-read this part of this statement where we describe [how we use](#) your personal information and this part where we describe the categories of [third parties with whom we may have shared](#) it. As stated elsewhere in this statement, [we do not sell](#), and within the last 12 months have not sold, any of your personal information to third parties.

Rights of California Residents

While we attempt to allow all visitors and users of our online and mobile resources and job seekers to exercise a degree of control over their personal information, under the CCPA we have a legal obligation to do so for you. More specifically, with respect to your personal information, you have the below-listed rights under the CCPA. While we would never do so anyway, the CCPA prohibits us from “discriminating” against you for exercising these rights by, for example, treating you differently from other California residents who did not do so.

- **Right to Know** – you have the right to request that we disclose to you, specifically, beyond the general statement immediately above, the categories and specific elements of personal information collected from you, disclosed for a business purpose, or sold (if applicable) as well as the categories of third parties who received or purchased it.
- **Right to Access** – you have the right to receive a copy of the categories and specific elements of personal information we collected about you in the preceding 12 months.
- **Right to Delete** – you have the right, under certain circumstances, to request that we delete the personal information we collected about you.

You can exercise certain of these rights up to two different times every 12 months. To do so, just contact us at privacy@fullsteamstaffing.com or 909-321-4243. We may ask you to fill out a request form. The CCPA only allows us to act on your request if we can verify your identity or your authority to make the request, so you will also need to follow our instructions for identity verification.

If you make a verifiable request per the above, we will confirm our receipt and respond in the time frames prescribed by the CCPA.

SUBMITTING INFORMATION FROM OUTSIDE THE U.S.

We control and operate the online and mobile resources from within the United States of America (the “**U.S.**”). Information collected through the online and mobile resources may be stored and processed in the United States or any other country in which we or our vendors maintain facilities. Although we do not actively block or monitor visitors from other countries, the online and mobile resources are directed only at visitors from the U.S. As such, this privacy statement is consistent with U.S. law and practice and is not adapted to other laws. We will apply the applicable laws of the U.S. including as embodied in this privacy statement in place of data protections under your home country's law. That is, you freely and unambiguously acknowledge that this privacy statement, not your home country's laws, controls how Full Steam will collect, store, process, and transfer your personal information.

CHANGES TO THIS PRIVACY STATEMENT

We reserve the right to change or update this statement from time to time. Please check our online and mobile resources periodically for such changes since all information collected is subject to the statement in place at the time of collection. Typically, we will indicate the effective/amendment date at the beginning of this statement. If we feel it is appropriate, or if the law requires, we'll also provide a summary of changes we've made near the end of the new statement.

CONTACTING US

If you have questions about our privacy statement or privacy practices, please contact our Privacy Office:

- **Address**
Full Steam Staffing
Attn: Privacy Office
2121 S. Haven Avenue
Suite 100
Ontario, CA 91761
- **Email:** privacy@fullsteamstaffing.com
- **Phone:** 909-947-3755