

**ATRIUM STAFFING SERVICES LTD & ITS AFFILIATES  
(COLLECTIVELY “ATRIUM”)  
CCPA PRIVACY NOTICE FOR CALIFORNIA RESIDENTS**

**Effective Date:** July 1, 2020

This CCPA Privacy Notice for California Residents (“CCPA Notice”) supplements the information contained in Atrium Staffing Services LTD’s (and its affiliates and subsidiaries) (“Atrium,” “we,” “us,” or “our”) [Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). This CCPA Notice sets forth our privacy practices as required by the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this notice.

**INFORMATION ATRIUM COLLECTS**

Atrium, through our websites ([www.atriumstaff.com](http://www.atriumstaff.com) and [www.atriumglobal.com](http://www.atriumglobal.com)) (collectively the “Website”) or through other technological means, 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 (“personal information”). More specifically, Atrium collects the following categories of personal information from California employees or potential employees, which will depend on the particular business purpose for which we collect it:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, Internet Protocol address, email address, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, education, employment, employment history, bank account number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), 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).	YES
D. Commercial	Services purchased, obtained, or considered.	YES

information.		
E. Biometric information.	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 voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	information on a consumer’s interaction with a website, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Please review this CCPA Privacy Notice for California Consumers or Employees for information related to this category.	YES
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)).	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.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Atrium obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or services we provide you.
- Indirectly from you. For example, from observing your actions on our website or from information your computer or mobile device transmits when interacting with our website or mobile applications, among other things.
- Third parties. For example, staffing and recruiting agencies with whom we contract for services and consumer reporting agencies when we perform employee background screenings.

### **USE OF PERSONAL INFORMATION**

Atrium may use, or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job or become an employee, we will use that Personal Information in connection with your employment or potential employment.
- To contact you and to inform you about benefits or information relating to your employment or potential employment.
- To provide, support, personalize, and develop our website and services relating to your employment or potential employment.
- To create, maintain, customize, and secure your information or account with us.
- To process your requests or transactions and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our systems, Website, services, databases and other technology assets, and business.
- For research, analysis, and business development, including to develop and improve our business processes, Website and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA or subsequently agreed to by you.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Atrium's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Atrium about our Consumers is among the assets transferred.

Atrium will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### ***Sharing Personal Information***

Atrium may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Service providers.
- Federal and State government as it relates to the employment services
- Other third parties such as consumer reporting agencies when we perform employee background screenings

### ***Disclosures of Personal Information for a Business Purpose***

In the preceding twelve (12) months, Atrium has disclosed the following categories of personal information for a business purpose:

- X [Category A: Identifiers.]
- X [Category B: California Customer Records personal information categories.]
- X [Category C: Protected classification characteristics under California or federal law.]
- X [Category D: Commercial information.]
- [Category E: Biometric information.]
- X [Category F: Internet or other similar network activity.]
- [Category G: Geolocation data.]
- [Category H: Sensory data.]
- X [Category I: Professional or employment-related information.]
- X [Category J: Non-public education information.]
- X [Category K: Inferences drawn from other personal information.]

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Other third parties such as consumer reporting agencies when we perform employee background screenings
- Federal and State governments as it relates to the employment services

### ***Sales of Personal Information***

In the preceding twelve (12) months, Atrium has not sold personal information.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Access to Specific Information and Data Portability Rights***

You have the right to request that Atrium disclose certain information to you about our collection and use of your personal information over the past 12 months. Once Atrium receives and confirm your verifiable consumer request (see Section Exercising Access, Data Portability, and Deletion Rights below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- sales, identifying the personal information categories that each category of recipient purchased; and
- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Deletion Request Rights***

You have the right to request that Atrium delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Section Exercising Access, Data Portability, and Deletion Rights below), Atrium will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Accessing <https://www.atriumstaff.com/privacy-policy/>
- Submitting a [Data Subject Request](#)

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request 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.

Atrium cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.

Atrium will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see Personal Information Sales Opt-Out and Opt-In Rights.

### **Response Timing and Format**

Atrium endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons Atrium cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically a comma-separated values (CSV) file or Excel file.

Atrium do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If Atrium determines that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Personal Information Sales Opt-Out and Opt-In Rights**

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). Atrium does not sell the personal information of consumers.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link: [Do Not Sell My Personal Information](#)

You do not need to create an account with us to exercise your opt-out rights.

### **Non-Discrimination**

Atrium will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, Atrium may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive Atrium offers will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program does not require your prior opt in consent. We currently provide the following financial incentives: Referral Program:

<https://www.atriumstaff.com/jobs/submit-a-referral/>.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please submit a [Data Subject Request](#) form.

### **Changes to Our Privacy Notice**

Atrium reserves the right to amend this CCPA Notice at our discretion and at any time. When Atrium makes changes to this CCPA Notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Atrium collects and uses your information described herein and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Website:** <https://www.atriumstaff.com/>

**Attn: Privacy Administrator**  
**Atrium Staffing LLC**  
**387 Park Avenue South**  
**3rd Floor**  
**New York, NY 10016**