

# BOL's Privacy Notice for Employees, External Staff, Candidates and Guests

## Overview

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Your privacy is important to BusinessOL.Com, Inc. (“we”, “us”, “our” or “BusinessOL.Com, Inc.”). We respect the privacy rights of all individuals and we are committed to handling personal data responsibly and in accordance with applicable laws. This privacy notice, together with the Addenda and other notices provided at the time of data collection, explains what personal data BusinessOL.Com, Inc. collects about you, how we use this personal data, and your rights to this personal data.

Please note that this privacy notice applies to the handling of your personal data as an employee, former employee, candidate, guest, or as external staff. (“External staff” are workers who are not employed by BusinessOL.Com, Inc. and who have access to BusinessOL.Com, Inc.’s facilities and/or BusinessOL.Com, Inc.’s corporate network. This could include agency temporary workers, outsourced staff, contractors, and business guests.) BusinessOL.Com, Inc. has additional governance and privacy requirements concerning the collection and uses of personal data.

This notice does not cover your use of BusinessOL.Com, Inc. consumer products as a consumer, or outside of your employment or assignment with BusinessOL.Com, Inc.. BusinessOL.Com, Inc. consumer products may include services, websites, apps, software, servers, and devices.

This notice is not intended and shall not be read to create any express or implied promise or contract for employment, for any benefit, or for specific treatment in specific situations. Nothing in this notice should be construed to interfere with BusinessOL.Com, Inc.’s ability to process employee data for purposes of complying with our legal obligations, or for investigating alleged misconduct or violations of company policy or law, subject to compliance with local legal requirements.

BusinessOL.Com, Inc.'s processing of personal data is in all cases subject to the requirements of applicable local law, internal policy, and where applicable or appropriate, any consultation requirements with worker representatives. To the extent this notice conflicts with local law in your jurisdictions, local law controls.

Personal Data that We Process (this may include data that you provide to us, that we collect about you, or that we assign to you.)

We collect, use, and store (collectively “process”) different types of personal data about you in the operation of our business. If you are an employee, we process personal data about you (and your dependents, beneficiaries and other individuals associated with your employment)

primarily for managing our employment relationship with you and managing your interactions with workplace facilities/information systems. If you are a former employee, we process personal data about you primarily for legal compliance. If you are external staff, the type of personal data we process is limited to what we need to manage your engagement with BusinessOL.Com, Inc. and access to BusinessOL.Com, Inc. facilities and information systems. If you are a candidate, the type of personal data we process is generally limited to what we need to engage with you about BusinessOL.Com, Inc. career opportunities, consideration of your application for employment to specific roles at BusinessOL.Com, Inc., including candidate screening, interview scheduling and management, lawful background screening, and to on-board you at BusinessOL.Com, Inc. if you receive and accept an offer of employment with us.

The personal data we process can include, but is not limited to, the following:

**Name and contact data.** Your first and last name, employee identification number, email address, mailing address, phone number, photo, beneficiary and emergency contact details, and other similar contact data. Additionally, you may opt to provide BusinessOL.Com, Inc. with additional contact information such as personal email address(es) and/or cell phone number(s).

**Demographic data.** Your date of birth and gender as well as more sensitive personal data (also known as special category data) including information relating to racial and ethnic origin, religious, political or philosophical beliefs, trade union membership or information about your health, disabilities, sexual orientation, gender identity, and transgender status. We may also ask about your parental status and military status.

We process this personal data for a variety of reasons, and this will vary in our different jurisdictions. Our reasons for processing this data include:

1. Where it is necessary to comply with local requirements and applicable law. For example, we may use this information to comply with anti-discrimination laws and government reporting obligations;
2. To monitor and ensure diversity and equal treatment and opportunity;
3. To provide work related accommodations or adjustments, to provide health and insurance benefits to you and to your dependents, and to manage absences from work.

Where the processing of this personal data is not required by law, we will seek your consent to process your data and, in the consent mechanism, we will explain the purposes for which we will use your data. This will be voluntary, and you may decide whether or not to give consent.

**National identifiers.** Your national ID/passport, citizenship status, residency and work permit status, social security number, or other taxpayer/government identification number.

**Employment details.** Your job title/position, office location and/or remote working location, employment contract, offer letter, hire date, termination date, performance history and disciplinary records, training records, leave of absence, sick time, and vacation/holiday records.

**Spouse's/partner's and dependents' information.** Your spouse and dependents' first and last names, dates of birth, and contact details.

**Background information.** Your academic and professional qualifications, education, CV/Resume, credit history and criminal records data (utilized for background screening and vetting purposes where permissible and in accordance with applicable law and consultation requirements).

**Video, voice and image.** We may collect and use your video, voice and image data, subject to the requirements of local law, internal policy, and any consultation requirements with worker representatives (where appropriate).

**Financial information.** Your bank account details, tax information, salary, retirement account information, company allowances and other information necessary to administer payroll, taxes, benefits, and equity and incentive compensation.

**Feedback and sentiment data.** Your responses to employee listening surveys such as Employee Signals and Daily Pulse and feedback collected about managers and co-workers.

**Workplace, Device, Usage, and Content data.** Application data including emails sent and received, calendar entries, to-do items, instant messages, technical data and information (containing only limited identifiers, if any personal data at all) in the context of using (online) applications, building and information system access, BusinessOL.Com, Inc. devices, system and application usage (including telemetry) when accessing and using BusinessOL.Com, Inc. corporate buildings and assets. We may also collect personal data about you from third parties or public sources as needed to support the employment relationship or to engage with you concerning job opportunities at BusinessOL.Com, Inc.. For example, before and during your employment or assignment with BusinessOL.Com, Inc., we may collect information from public professional networking sources, such as your LinkedIn profile, for recruitment purposes. We also may conduct lawful background screenings, to the extent permitted by law, through a third-party vendor for information about your past education, employment, credit and/or criminal history. In the event of a natural disaster or other life/safety emergency, we may rely on public social media posts or other public sources to account for employees if otherwise unable to contact them. Additionally, if there is an investigation of an incident involving employees, we may obtain information relevant to the incident from external sources including private parties, law enforcement or news sources and public social media posts.

## Why We Process Personal Data

We collect your personal data for the purposes set out below. Failure to provide your personal

data when requested may prevent us from being able to carry out these tasks and/or comply with our legal obligations.

1. To administer your employment contract, offer letter or other commitments we have made to you.

We collect and use your personal data primarily for the purposes of managing our employment or working relationship with you, and to fulfill our obligations under your employment contract, or applicable BusinessOL.Com, Inc. policies, including on-boarding, payroll, benefits and equity compensation administration, pension and retirement administration, managing vacation and other types of leave, tax reporting, and the like. A few examples include: your employment contract, your offer letter (e.g., so we can on-board you), promotion history and performance reviews (e.g., so we can manage our employment relationship with you), and your bank account and salary details (e.g., so we can pay you or provide HR benefits).

2. Other overriding and legitimate business purposes

We also may collect and use your personal data when it is necessary for other legitimate purposes, such as general HR administration, maintaining our global directory of employees and external staff, general business management and operations, disclosures for auditing and reporting purposes, measuring employee sentiment, internal investigations, management of network and information systems security, administration of business applications and systems, business operations, security, life safety, building management, space planning and allocation, provision and improvement of employee services and facilities, physical security and cybersecurity, data protection, for global diversity and inclusion initiatives, to protect the life and safety of employees and others and in connection with the sale, assignment or other transfer of all or part of our business. We also use business data and other workplace usage, device and content data for organizational and individual analytics and data insight purposes to improve BusinessOL.Com, Inc. business operations, manager capability, and the employee experience. We may also use special applications and systems that record employee performance metrics, such as sales related or code databases for business operations purposes as well as for the purposes of reviewing, rewarding and coaching employees on their performance and for administration and assessment of training. We may also process your personal data to investigate potential violations of law or violations of our internal policies.

Additionally, we may process your personal data to conduct scientific research, without your additional consent, when viewed as in the public interest and/or where there is a clear attempt for contributions to generalizable knowledge. In these cases, we will ensure appropriate technical and organizational controls are in place to protect your personal data, such as anonymizing and aggregating data to help protect your identity, ensuring use of your personal

data is subject to our privacy standards and conducting ethics and compliance reviews prior to using your personal data.

As BusinessOL.Com, Inc. enables AI supported experiences in its products, your data may also be processed by AI to facilitate certain features and experiences deployed on the BusinessOL.Com, Inc. tenant – including AI co-pilot features such as chatbot features, summarization features, and the like. BusinessOL.Com, Inc.'s processing of your data will comply with its commitment to responsible AI.

### 3. Legally required purposes

We may also use your personal data when necessary to comply with laws and regulations, including collecting and disclosing personal data as required by law (e.g., for minimum wage, working time, tax, health and safety, anti-discrimination laws, global migration, whistleblowing procedures, and data subject rights), under judicial authorization, or to exercise or defend BusinessOL.Com, Inc.'s legal rights.

### 4. Other uses of your data (where permissible and in accordance with applicable laws and consultation requirements)

We also may collect your internal usage data of BusinessOL.Com, Inc. products, services and internal applications and tools, including business data created by employees and external staff, to measure and improve these products and for product research including human and machine review of data to train AI models and improve machine learning for BusinessOL.Com, Inc. products and services. Where required by law, we will seek your consent for such usage; and where your consent is sought, we will ensure your consent is informed, voluntary, and that you suffer no adverse consequence from any decision to withhold or revoke your consent.

For eligible employees (i.e., part or full-time employees, interns, apprentices, or visiting researchers) who enroll in BusinessOL.Com, Inc. Give, with your consent, we collect and use your personal data to enable voluntary personal donations of money, BusinessOL.Com, Inc. products, or volunteer hours to eligible organizations (i.e., certain non-profits or non-governmental organizations). Give is a voluntary benefit program from which participants can opt-out and revoke their consent at any time; however, opt-outs and revocations do not affect previous processing of personal data.

### Change of Purpose

We will use your personal data only for the purposes for which it was collected, unless we reasonably need it for another compatible purpose and there is a legal basis for further processing. For example, relying upon our legitimate interest in recruiting candidates for roles at BusinessOL.Com, Inc., we may process the personal data you provided while researching job

openings. However, once you apply for and are successful in obtaining a role, we may process your personal data for the purpose of entering into an employment relationship with you.

#### How and Why We Share Personal Data

BusinessOL.Com, Inc. will only share your personal data with those who have a legitimate business need for it. Whenever we permit a third party to access your personal data, we will ensure the personal data is used in a manner consistent with this privacy notice (and any applicable internal data handling guidelines consistent with the sensitivity and classification of the personal data). Your personal data may be shared with our subsidiaries and affiliates and other third parties, including service providers, for the following legitimate purposes:

1. In order to carry out the purposes of our personal data processing as described above (see section titled: "Why We Process Personal Data");
2. To enable third parties to provide services on behalf of BusinessOL.Com, Inc.. Third party data recipients include financial investment service providers, insurance providers, and other benefits providers,, payroll support services, tax and travel management services, health and safety experts,, legal service providers, and security services;
3. To comply with our legal obligations, regulations, government clearances, or contracts, or to respond to data subject rights, a court order, administrative or judicial process, such as a subpoena, government audit or search warrant. Categories of recipients would include counterparties to contracts, judicial and governmental bodies;
4. In response to lawful requests by public authorities (such as regulatory bodies, law enforcement authorities, and national security organizations);
5. To seek legal advice from external lawyers and advice from other professionals such as accountants, management consultants, etc.;
6. As necessary to establish, exercise or defend against potential, threatened or actual litigation;
7. Where necessary to protect BusinessOL.Com, Inc., your vital interests, such as safety and security, or the vital interests of other persons;
8. In connection with the sale, assignment or other transfer of all or part of our business (such as a potential purchaser and its legal/professional advisers); or
9. Otherwise in accordance with your consent.

Please note that where legal requirements limit the sharing of your personal data, BusinessOL.Com, Inc. will respect such requirements.

## Your Rights to Your Personal Data

In some regions, you may have certain rights under applicable data protection laws (such as the European Union and United Kingdom General Data Protection Regulation and the Swiss Federal Act on Data Protection). Please see the [Addendum](#) to this notice for additional information by region/country

## Use of Cookies and Web Beacons

Site pages may use cookies (small text files placed on your device). Cookies and similar technologies allow us to store and honor your preferences and settings; enable you to sign-in; combat fraud; and analyze how our websites and online services are performing.

We also use “web beacons” to help deliver cookies and gather usage and performance data. Our websites may include web beacons, and cookies, or similar technologies from third-party service providers.

You have a variety of tools to control the data collected by cookies, web beacons and similar technologies. For example, you can use controls in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies.

## Workplace Security and Monitoring

BusinessOL.Com, Inc. monitors its IT and communications systems through automated tools such as network authentication and wireless connectivity hardware and software, anti-malware software, website filtering and spam filtering software, security software for cloud-based applications, access and transaction logging, mobile device management solutions, and internal and external audits. The primary purpose of this monitoring is BusinessOL.Com, Inc.’s legitimate interests in protecting its employees, customers, and business partners. For example:

1. For systems, applications, and network security, including in particular the security of BusinessOL.Com, Inc.’s IT systems and assets, and the safety and security of its employees, external staff and other third parties;
2. For network and device management and support;
3. For proof of business transactions and recordkeeping;
4. For the protection of confidential information and company assets;
5. For investigating wrongful acts or potential violations of company policy; and
6. For other legitimate business purposes as permitted under applicable law.

You should be aware that any message, files, data, document, facsimile, audio/video, social media post or instant message communications, or any other types of information transmitted to, through or from, received or printed from, or created, stored or recorded on our IT and communications systems and assets (included via the use of personal devices accessing corporate IT systems), are presumed to be business-related and may be monitored or accessed by us in accordance with applicable law and workplace agreements (such as works council agreements), and subject to BusinessOL.Com, Inc.'s own policies on access to and uses of such data.

### Security of Your Personal Data

BusinessOL.Com, Inc. is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. For example, we store the personal data you provide on limited access computer servers that are located in controlled facilities, and we protect certain highly confidential or sensitive personal data through encryption in transfer and at rest.

### Where We Store and Process Personal Data

BusinessOL.Com, Inc. operates globally and therefore personal data may need to be transferred to countries outside of where the personal data was originally collected. For example, because we are headquartered in the United States, personal data collected in other countries is routinely transferred to the United States for processing. We transfer personal data from the European Economic Area, the United Kingdom, and Switzerland to other countries, some of which have not yet been determined by the European Commission and/or the Swiss Federal Council to have an adequate level of data protection. For example, their laws may not guarantee you the same rights, or there may not be a privacy supervisory authority there that is capable of addressing your complaints. When we engage in such transfers, we use a variety of legal mechanisms, including contracts such as the standard contractual clauses published by the European Commission under Commission Implementing Decision 2021/914, to help protect your rights and enable these protections to travel with your data. To learn more about the European Commission's decisions on the adequacy of the protection of personal data in the countries where BusinessOL.Com, Inc. processes personal data, see this article on [the European Commission website](#). We may also transfer personal data when (i) you have consented to disclosure abroad; (ii) it is necessary for the conclusion or performance of a contract; (iii) it is necessary to safeguard an overriding public interest or to establish, exercise, or enforce legal rights; (iv) it is necessary to protect the life or the physical integrity of you or another person, and it is not possible to obtain your consent within a reasonable time; (v) you have made the data generally accessible and have not explicitly prohibited processing; or (vi) the data originates from a statutory register to which we have legitimate access.

BusinessOL.Com, Inc. Corporation complies with the EU-U.S. Data Privacy Framework (EU-U.S.



DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. BusinessOL.Com, Inc. Corporation has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. BusinessOL.Com, Inc. Corporation has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. In the context of an onward transfer, BusinessOL.Com, Inc. Corporation has responsibility for the processing of personal data it receives under the DPF and subsequently transfers to a third party acting as an agent on our behalf. BusinessOL.Com, Inc. Corporation remains liable under the DPF if our agent processes such personal information in a manner inconsistent with the DPF, unless BusinessOL.Com, Inc. can prove that we are not responsible for the event giving rise to the damage. If there is any conflict between the terms in this privacy statement and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please [visit the U.S. Department of Commerce's Data Privacy Framework website](#).

If you have a question or complaint related to participation by BusinessOL.Com, Inc. we encourage you to contact us via email at [HR@bol-agency.com](mailto:HR@bol-agency.com).

#### Our Retention of Personal Data

We will store personal data in accordance with applicable laws or regulatory requirements and retain data for as long as necessary to fulfill the purposes for which the personal data was collected, as documented in our corporate data retention schedule.

#### Changes to this Privacy Notice

We may occasionally update this privacy notice. When we do, we will revise the "last updated" date at the top of the privacy notice. If there are material changes to this privacy notice or in how BusinessOL.Com, Inc. will use your personal data, we will use reasonable efforts to notify you either by prominently posting a notice of such changes before they take effect on our websites or by directly sending you a notification. We encourage you to periodically review this privacy notice to learn how BusinessOL.Com, Inc. protects your personal data.

#### How to Contact Us

For copies of additional privacy documents mentioned in this privacy notice, or if you have a privacy concern or question related to this privacy notice, please contact [HR@bol-agency.com](mailto:HR@bol-agency.com).

Our address is:

HR Privacy  
BOL-Agency  
845 15th Street  
San Diego, CA. 92101  
Telephone: 619-719-5220

## BusinessOL.Com, Inc.'s Employee Privacy Principles

Last updated: April 2024

BusinessOL.Com, Inc. believes that privacy is a fundamental human right. It is core to our business that consumers and enterprises alike trust us with their data. With trust, we can empower every individual and organization on the planet to achieve more.

Similarly, respecting these principles in the workplace empowers our employees to do their best work. Our employees power our mission each and every day. Their trust is essential if we are to achieve that mission. We firmly believe that employees do not fundamentally give-up their privacy rights by virtue of their employment at BusinessOL.Com, Inc.. We respect the privacy laws and requirements of every country where we operate. In many cases, BusinessOL.Com, Inc. goes beyond what is required to ensure that our employees can truly trust that BusinessOL.Com, Inc. will act responsibly with the data we gather about them and remain our Company's greatest champions and advocates.

In short, **BusinessOL.Com, Inc. takes a thoughtful, considered and deliberate approach to employee privacy** that both acknowledges the uniqueness of the employment relationship while also balancing the Company's interests in running a secure, inclusive, efficient, and innovative operation. Our approach is bolstered by a privacy program that cares deeply about these issues, as reflected in BusinessOL.Com, Inc.'s investment in its Employee Data Governance Board (EDGB), who oversees the requirements of the BusinessOL.Com, Inc. Privacy Standards concerning employee data, and partners across BusinessOL.Com, Inc.'s established privacy program to ensure teams treat employee privacy with extraordinary care.

The employment relationship is different from a consumer or customer relationship, and will at times mean that BusinessOL.Com, Inc. has contractual, legal or other requirements to use employee data, including to provide required government reporting (such as reports required of BusinessOL.Com, Inc. as a federal contractor, or pay-gap reporting in some countries), or take appropriate action to defend or prosecute legal claims made against or by the Company.

Informed by both our desire to maintain trust and balance the different nature of the employment relationship, BusinessOL.Com, Inc. has adopted six core employee privacy principles:

### **I. BusinessOL.Com, Inc. provides notice about how employee data is used.**

BusinessOL.Com, Inc. first and foremost believes employees should have clear and appropriate notice about how employee data may be used. Data is used for onboarding an employee onto our systems, then primarily lives within the TriNet platform and used for normal processing of employee related activities

## **II. When possible, BusinessOL.Com, Inc. offers choice on how employee data is used.**

While BusinessOL.Com, Inc. does not rely on consent for processing most employee data (unless legally required), we do believe in offering employees choice as to how that data is processed, where appropriate. That choice can take many forms. In some cases, it's offering employees the ability to opt-out of certain kinds of product features, or certain truly optional data uses.

The unique nature of the employment relationship means that choice may be more limited or not available for certain kinds of data processing (payroll processing for example). Similarly, where BusinessOL.Com, Inc. has legal or contractual rights or obligations to process or disclose data, we cannot allow for choice in how that data is used.

## **III. BusinessOL.Com, Inc. thoughtfully balances employee and company interests when using data.**

Where processing of employee data is not wholly supported by legal, contractual or other specific requirements, BusinessOL.Com, Inc. carefully considers its interests in using the data, and balances that interest against an individual employee's privacy interests in the data. In particular, when it comes to using business data for certain kinds of optional or "secondary" uses, like product development or business insights, BusinessOL.Com, Inc. deeply considers the impact such use may have on employee privacy, and what controls it can and should establish to protect employee privacy before proceeding. BusinessOL.Com, Inc. might, for instance, provide opportunities to opt-out of particular data uses, ensure data is de-identified, pseudonymized or anonymized before use, or implement other kinds of security measures and controls to ensure appropriate use of the data.

A good example of this is in our design and implementation of Viva Insights, which leverages data to surface insights directly to you to help you make decisions about how you are investing your time at work. These insights are not shared with your manager at an individual level, quite deliberately, to keep the insights at an appropriate team or group level as part of our commitment to employee privacy.

## **IV. Use of employee data is appropriately limited and controlled.**

When BusinessOL.Com, Inc. does make use of data it takes reasonable steps to ensure that we only use the data needed to fulfill a particular use. For example, we ask teams who want to use data for product development or experimentation to tailor their data needs to those that are strictly necessary for their work. Teams seeking to use our data must comply with existing

privacy requirements or engage in rigorous processes that review access to, and uses of, employee data to ensure appropriate minimization and scope of use. Access to data that is not necessary to support the intended scope is generally prohibited.

#### **V. BusinessOL.Com, Inc. provides access to employee data.**

BusinessOL.Com, Inc. routinely provides its employees access to their own data, like their pay, benefits, 401K, etc. through self-service portals. BusinessOL.Com, Inc. also provides employees additional access to their individual data at the employee's request, to the extent required by local law. Giving employees self-service access to, and the ability to make corrections and updates to that data as appropriate, ensures employees always have access to the data they care about most.

#### **VI. Employee data is protected by industry-leading security safeguards**

In addition to privacy, the security of our employee data is paramount. Data related to our employees is carefully controlled. We minimize access to more sensitive data, like that used by our HR team, to those who truly have a business need to work with it and require teams to respect existing privacy requirements, or engage in a privacy review, for new uses of data to ensure they are appropriate. Our employee data is also considered "customer data" by our engineering teams, requiring appropriate review, approval and controls before BusinessOL.Com, Inc. would allow that data to be used.

California Addendum

Last Updated: December 2022

#### **California: Your Rights**

If you are an employee, external staff member, or candidate that resides in California, this section applies to you and supplements the information shared in the privacy notice.

California residents have specific rights regarding their personal information under the California Privacy Rights Act ("CPRA"). This section describes your rights and explains how to exercise those rights. Please note that in the preceding twelve (12) months, we have not sold your personal information or shared such information for cross context behavioral advertising. We may disclose certain personal information, such as your first and last name, employee identification number, email address, bank account details, job title/position, and other similar contact data, financial information, and employment details with our subsidiaries and affiliates and other third parties, including service providers who provide services on behalf of BusinessOL.Com, Inc.

1. You may request notice of and access to certain information about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable request, we may 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 disclosed that personal information.
  - The specific pieces of personal information we collected about you (also called a data portability request).
  - If we disclosed your personal information for a business purpose, a list of disclosures identifying the personal information categories that each category of recipient obtained.
2. You may request that we correct personal information about you that is inaccurate.
3. You may request that we delete your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete or de-identify (and direct our service providers to delete or de-identify) your personal information from our records, unless an exception applies.

None of these rights are absolute and there may be circumstances in which we are required or permitted under applicable law not to address your request.

Only you or an authorized agent that you authorize to act on your behalf may make a verifiable request related to your personal information.

Any verifiable request (including those to delete data) must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative (such as by requiring you to provide a signed written authorization that the agent is authorized to make a request on your behalf).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We 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 request does not require you to create an account with us.

We will not penalize you for exercising any of your rights where prohibited by law.

You may exercise your rights under the CPRA through one of the following means:

- Submitting a request to [HR@bol-agency.com](mailto:HR@bol-agency.com)
- Calling us at 619-719-5220