



California Personnel Privacy Notice (“Notice”)

Effective Date: January 6, 2023

This Notice describes how Viant Technology LLC and its subsidiaries (“**Company**,” “**we**,” “**us**,” or “**our**”) process personal information (“**PI**”) of Personnel (defined below) in various human resources (“**HR**”) contexts. This Notice is designed to meet obligations under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, the “**CCPA**”). In the event of a conflict between any other Company policy, statement, or notice and this Notice, this Notice will prevail as to California Personnel, unless stated otherwise. Capitalized terms used but not defined in this Notice shall have the meanings given to them under the CCPA.

Applicability: This Notice applies to the following California residents who provided us with PI in HR contexts:

- Job applicants who have applied for a position with Company.
- Current/former employees of Company.
- Independent contractors of Company.

This Notice also applies to California residents whose family member or friend has provided PI about you to Company in an HR context, such as if:

- You are listed as an emergency contact for a Company employee or former employee.
- You are a beneficiary or dependent of a Company employee or former employee.

The individuals referred to in the foregoing bullet points are collectively referred to as “**Personnel**” throughout this Notice. Section 1 of this Notice provides notice of our data practices, including our collection, use, retention, and disclosure of Personnel PI. Sections 2-5 of this Notice provide information regarding California Personnel rights under the CCPA and how you may exercise them.

Non-Applicability: This Notice does not apply to our consumer facing website(s), including the careers pages, or our other data practices outside of the human resources context, which are addressed in our general privacy notice available [here](#).

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1. NOTICE OF DATA PRACTICES

The description of our data practices in this Notice covers the twelve (12) months prior to the Effective Date and will be updated at least annually. Our data practices may differ between updates, however, if materially different from this Notice, we will provide supplemental pre-collection notice of the current practices, which may include references to other privacy policies, notices, or statements. Otherwise, this Notice serves as our notice at collection.

(a) PI Sources and Use

We may collect your PI directly from you, such as when you apply for a position or become employed or engaged by us (e.g., identification/identity data, contact details, educational and employment data), others through interactions in the course of employment or engagement, and third parties (e.g., references).

Generally we use Personnel PI for HR Business Purposes and as otherwise related to the operation of our business, including for: Performing Services; Managing Interactions and Transactions; Security; Debugging; HR-related Advertising & Marketing (i.e., talent acquisition); Quality Assurance; Processing Interactions and Transactions; and Research and Development. For example, we use Personnel PI for the following purposes:

- Recruitment
- Running background checks
- Employee intake/ onboarding/ off-boarding
- Maintaining personnel records
- Payroll, reimbursements, and timekeeping
- Processing leaves of absence
- Processing workers' compensation claims
- Booking employee travel
- Benefits administration
- Employee activation initiatives and communications
- Facilitating diversity and inclusion programs
- Administering training and education programs
- HR IT systems and security
- Employee and performance management
- Health & safety/occupational health
- Security (including electronic and of premises)

We may also use PI for “**Additional Business Purposes**” in a context that is not a Sale or Share under the CCPA, such as:

- Disclosing it to our Service Providers, Contractors, or Processors that perform services for us (“**Vendors**”);
- Disclosing it to you or to other parties at your direction or through your action (e.g., payroll processors, benefits providers, some software platform operators etc.);

- For the additional purposes explained at the time of collection (such as in the applicable privacy policy or notice);
- As required or permitted by applicable law;
- To the government or private parties to comply with law or legal process or protect or enforce legal rights or obligations or prevent harm;
- Where we believe we need to in order to investigate, prevent or take action if we think someone might be using information for illegal activities, fraud, or in ways that may threaten someone’s safety or violate our policies or legal obligations; and
- To assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes control over all or part of our business (“**Corporate Transaction**”).

Subject to restrictions and obligations under the CCPA, our Vendors may also use your PI for Business Purposes and Additional Business Purposes, and may engage their own vendors to enable them to perform services for us. For information regarding our public-facing websites, including career pages, see also our privacy notice that governs those activities [here](#). Outside of the context of such website visitation, which is governed by such other privacy notice, we do not “Sell” or “Share” Personnel PI.

(b) PI Collection, Disclosure, and Retention - By Category of PI

We collect, disclose, and retain PI as follows:

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
1. Identifiers	Real name, alias, postal address, unique personal identifiers, online identifier, Internet Protocol address, and e-mail address.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors • Payroll and benefits vendors and providers • Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process); and/or • Other parties (e.g., litigants) within the limits of Additional Business Purposes.
2. Personal Records	Name, signature, description, address, telephone number, emergency contact information, date of birth, disciplinary action, performance ratings, and financial information (e.g., account number or routing number). Some PI included in	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors • Payroll and benefits vendors and providers • Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process); and/or • Other parties (e.g., litigants) within the limits of Additional Business Purposes.

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
	this category may overlap with other categories.	
3. Personal Characteristics or Traits	In some circumstances, we may collect PI that is considered protected under U.S. law, such as age, gender identity, gender expression, citizenship status, nationality, racial or ethnic origin, or information related to medical conditions.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors • Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process); and/or • Other parties (e.g., litigants) within the limits of Additional Business Purposes.
4. Commercial Information	Records of products or services purchased or obtained in the HR context, such as benefits you have signed up for; compensation and bonus information; and expense details.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors • Payroll and benefits vendors and providers • Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process); and/or • Other parties (e.g., litigants) within the limits of Additional Business Purposes.
5. Internet Usage Information	When you use our online systems or otherwise interact with us online, we may collect browsing history, search history, and other information regarding your interaction with our systems or other sites, applications, or content.	<p>Disclosures for Business Purposes</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors; and/or • Other parties (e.g., litigants, including the government) within the limits of Additional Business Purposes.
6. Geolocation Data	If you use our systems or interact with us online we may gain	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors; and/or

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
	access to the approximate , and sometimes precise, location of the device or equipment you are using, or the location from which you are accessing our systems. We may also track the location of Company-owned equipment.	<ul style="list-style-type: none"> • Other parties (e.g., litigants, including the government) within the limits of Additional Business Purposes.
7. Sensory Data	We may collect audio, electronic, or similar information when you contact us through our HR help line and via our video security recordings.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • Call analytics vendors • Security vendors; and/or • Other parties (e.g., litigants, including the government) within the limits of Additional Business Purposes.
8. Professional or Employment Information	Professional, educational, or employment-related information, such as job title/role, work history, references, and salary/wage expectations.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors • Payroll and benefits vendors and providers; and/or • Other parties (e.g., litigants, including the government) within the limits of Additional Business Purposes.
9. Inferences from PI Collected	We may draw inferences from other information we collect about you, such as regarding your abilities or performance at work.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors; and/or • Other parties (e.g., litigants, including the government) within the limits of Additional Business Purposes.

There may be additional information we collect that meets the definition of PI under the CCPA but is not reflected by a category above, in which case we will treat it as PI as required, but will not include it when we describe our practices by PI category. Because there are numerous types of PI in each category, and various uses for each PI type, our actual retention periods for PI vary, but are typically based on the statute of limitations for related claims and for so long as we have another reasonable business

processing or record keeping purpose. We evaluate how long to retain specific PI pieces based on how long we have an ongoing legitimate purpose for the retention.

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2. YOUR RIGHTS AND HOW TO EXERCISE THEM

California Personnel have the same rights to know/access, delete, correct, limit, and opt-out as traditional Consumers and may learn more about these rights and how to exercise them in Section 2 of our Enterprise-wide Privacy Notice [here](#). Note that you should indicate where requested the context in which you are making the request (e.g., Consumer or applicant / employee) and regarding our public facing websites, including careers pages, you will need to make a request as a Consumer.

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3. NON-DISCRIMINATION / NO RETALIATION

We will not discriminate or retaliate against you in a manner prohibited by the CCPA for your exercise of your privacy rights.

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4. NOTICE OF FINANCIAL INCENTIVE PROGRAMS

We do not currently offer discounts or other rewards to Personnel in connection with providing us with PI. However, we may provide Personnel with information on how to participate in third party provider programs that do. Those providers' privacy policies and notices govern their programs and data practices.

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5. OUR RIGHTS AND THE RIGHTS OF OTHERS

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your rights under the CCPA. In addition, we are not required to honor your requests to the extent that doing so would infringe upon our or another person's or party's rights or conflict with applicable law.

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6. CONTACT US

If you have any questions, comments, or concerns about our HR privacy practices, please contact us by e-mail at HRPrivacy@viantinc.com or call us at 888-902-4870. Please note that e-mail communications

will not necessarily be secure; accordingly, you should not include sensitive information in your e-mail correspondence with us.

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