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## DCS Privacy Notice for California Employees

**Effective Date:** January 1, 2020

**Last Reviewed on:** December 31, 2019

This **Privacy Notice for California Employees** supplements the information contained in DCS Corporation's [Privacy Policy](#) and applies to employment-related personal information collected from California-based employees, job applicants, contractors, interns or similar individuals who reside in the State of California ("employees" or "you"). DCS adopts this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meanings when used in this Notice.

### Information We Collect

When employees of DCS and its affiliates use company issued computers, we collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee, household, or device ("**personal information**"). 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 (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, DCS and its affiliates have collected the following categories of personal information from our employees (and their covered dependents) within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card	Yes

statute (Cal. Civ. Code § 1798.80(e)).	number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	
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 information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No
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.	Browsing history, search history, information on a consumer's interaction with a website, application, 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.	Current or past job history or performance evaluations.	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.	No

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or records you provide.
- Indirectly from you. For example, from observing your browsing history while using DCS computers.

### **Use of Personal Information**

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

- To fulfill or meet the reason(s) you provided the information.
- To issue payments owed to you.
- To obtain and administer employee benefits, including but not limited to:
  - Group health plan coverage (medical, dental, vision);
  - Life insurance;
  - Disability insurance;
  - Worker's compensation;
  - Flexible spending accounts (FSAs), health savings accounts (HSAs), and dependent care accounts;
  - Retirement benefits, such as 401Ks and ESOP benefits; and
  - Educational assistance benefits.
- To provide information on how other employees can contact you for work-related purposes.
- To respond to procurement opportunities with the federal government where you are identified as a key person.
- To help maintain the safety, security, and integrity of our company assets, physical locations, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

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

### **Sharing Personal Information**

We may disclose your personal information to a third party for employment purposes or in the submission of proposals. These third parties may include (but are not limited to) vendors with whom DCS contracts, insurance companies and other benefit administrators, and the federal government.

When we disclose personal information for employment purposes, we enter a contract with the service provider 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.

***Disclosures of Personal Information for Employment Purposes***

In the preceding twelve (12) months, Company has disclosed to third parties the following categories of personal information for employment purposes:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category F: Internet or other similar network activity.

Category I: Professional or employment-related information.

Category J: Non-public education information.

***Sales of Personal Information***

In the preceding twelve (12) months, Company has not sold personal information about our employees or their covered dependents.

**Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will provide the updated notice on DCS Online and update the notice's effective date. **Your continued use of DCS Online 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 DCS and its affiliates collect and use your information described here 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:

**Phone:** (571) 227-6000

**Website:** [www.dscorp.com](http://www.dscorp.com)

**Email:** [HRHelpDesk@dscorp.com](mailto:HRHelpDesk@dscorp.com)

**Postal Address:**

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