



This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS is issued by Innover Inc., (hereinafter referred to as “We” or the “Company”) and applies solely to employees or prospective employees or contractors who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), the California Privacy Rights Act of 2020 effective January 1, 2023 (“CPRA”) and other California privacy laws. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

Information We Collect

Company collects 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 (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months, which will depend on the particular business purpose for which we collected it:

Category	Examples of Personal Information	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 statute (Cal. Civ. Code § 1798.80(e)).	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 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.	YES

<p>C. Protected characteristics under California or Federal law</p>	<p>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).</p>	<p>YES</p>
<p>D. Commercial information.</p>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>NO</p>
<p>E. Biometric information.</p>	<p>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.</p>	<p>YES</p>
<p>F. Internet or other similar network activity.</p>	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>NO</p>
<p>G. Geolocation data.</p>	<p>Physical location or movements.</p>	<p>NO</p>
<p>H. Sensory data.</p>	<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>NO</p>
<p>I. Professional or employment-related information.</p>	<p>Current or past job history or performance evaluations.</p>	<p>YES</p>
<p>J. Non-public education information (per the</p>	<p>Education records directly related to a student maintained by an educational institution or party</p>	<p>YES</p>

Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's or CPRA'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.

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

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website (<https://www.innoverdigital.com/>). For example, from submissions through our website portal or website usage details collected automatically.

- From third-parties that interact with us in connection with the services we perform. For example, from job search websites (LinkedIn, Indeed, etc.) to search for a prospective employee who can be placed on a client project.

Use of Personal Information

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

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to run your payroll, we will use that information to setup your profile and make necessary payroll deductions.
- To provide you with information or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- 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 and CPRA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We 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

We 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.

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

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category I: Professional or employment-related information.
- Category J: Non-public education information.

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

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

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

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive your request, we will disclose to you:

- The categories of personal information and sensitive information we collected about you.

- The categories of sources for the personal and sensitive information we collected about you.
- Our business or commercial purpose for collecting or selling that 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 disclosed your personal information for a business purpose, a list of those disclosures, identifying the personal information categories that each category of recipient obtained.
- Whether your information is sold or shared.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your request, we 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 providers to:

1. 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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.

7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Correct Inaccurate Personal Information

You have the right to request that we correct inaccurate personal information that we maintain about you. If you submit a valid and verifiable request and we can confirm your identity and/or authority to make the request, we will use commercially reasonable efforts to correct inaccurate personal information, as directed.

Right to Limit Use and Disclosure of Sensitive Personal Information

You have the right, at any time, to request that we limit the use of your sensitive personal information that we maintain about you to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, in the event we use or disclose your sensitive personal information for any other purpose. As a result, we provide you with the option to limit the use and/or disclosure of your sensitive personal information. If you submit a valid and verifiable request and we can confirm your identity and/or authority to make the request, we will use commercially reasonable efforts to limit the use of your sensitive personal information, as directed.

Exercising Your Rights

To exercise your rights to disclosure, deletion, or correction as described above, please submit a request to us by sending an e-mail to notifications@innoverdigital.com.

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

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

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

Response Timing and Format

We endeavor to respond to a request within 30 days of its receipt. If we require more time we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the request's receipt. The response we provide will also explain the reasons we 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.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine 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.

Non-Discrimination

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

- Deny you services.
- Provide you a different level of service.
- Discriminate in making employment decisions.

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 notify you by email.

Contact Information

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

Phone: + 1 (904) 267-0535

Website: <https://www.innoverdigital.com/>

Email: notifications@innoverdigital.com

Postal Address: 221 Roswell Street, Ste 172

Alpharetta, GA 30009

ATTN: Compliance Department