

Your California Privacy Rights

Effective January 1, 2023

Notice at Collection and California Applicant Privacy Disclosure

If you are applying to a position with Compass, and you reside in California, you are entitled under the California Consumer Privacy Act of 2018 (CCPA), as further amended by the California Privacy Rights Act of 2020 (CPRA), to certain information regarding the personal information that Compass collects about you and how we use that information, at or before the time we collect such information.

Notice at Collection

The following notice identifies the categories of personal information to be collected from you and the purposes for which the personal information will be used, including whether that information is sold or shared.

General Personal Information

Do We collect?	Categories of Personal Information	Purposes for Collection	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising
Yes	A. Identifiers: For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, date of birth; bank account information; IP address; or other similar identifiers	<ul style="list-style-type: none">• To fulfill or meet the reason for which the information is provided (HR function)• To share the personal information with service providers to carry out business purposes	No
Yes	B. Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, a name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's	<ul style="list-style-type: none">• To fulfill or meet the reason for which the information is provided (HR function)• To share the personal information with service providers to carry out business purposes	No

	license or state identification card number, education, employment history, bank account number or any other financial information, medical information, or health insurance information		
Yes	C. Characteristics of CA or Federal Protected Classifications: For example, race, religion, national origin), age (40 and over), gender, sexual orientation, medical condition, pregnancy (includes childbirth, breastfeeding and/or related medical conditions), familial status, disability, veteran status, or genetic information	<ul style="list-style-type: none"> • Short-term data use for the current interaction that is not used to build a profile 	No
No	D. Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	N/A	N/A
Yes	E. Biometric Information: For example, photos indicating a physical likeness, and keystroke patterns	<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided 	No
No	F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or	N/A	N/A

	advertisement, or Zoom data for employees		
No	G. Geolocation Data: For example, information that can be used to determine a device's physical location	N/A	No
No	H. Sensory or Surveillance Data: For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household	N/A	N/A
Yes	I. Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files and current and past job history.	<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided • Short-term data use for the current interaction that is not used to build a profile • To share the personal information with service providers to carry out other business purposes 	No
Yes	J. Education Information (<i>defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)</i>): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual's identity in relation to an educational institution either directly or indirectly through linkages with other information	<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided • Short-term data use for the current interaction that is not used to build a profile • To share the personal information with service providers to carry out other business purposes 	No

Sensitive Personal Information

Do We collect?	Categories of Sensitive Personal Information	Purposes for Collection	Sold to or Shared with Third Parties for Cross-Context Behavioral Advertising
Yes	Social Security Number, Driver's License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> To perform services or provide goods you request and reasonably expect from us To perform services for our business needs such as processing payments or benefits enrollment 	No
No	Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	N/A	No
No	Precise geolocation	N/A	No
Yes	Racial or ethnic origin, religious or philosophical beliefs, or union membership	<ul style="list-style-type: none"> To perform services or provide goods you request and reasonably expect from us 	No
No	Contents of a consumer's mail, email, and text messages (unless we are the intended recipient of the communication)	N/A	N/A
No	Genetic data	N/A	N/A
No	Biometric information for the purpose of unique identification	N/A	N/A
No	Health information*	N/A	No

No	Information concerning sex life or sexual orientation	N/A	N/A
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Please note that Compass does not collect any sensitive personal information for the purpose of inferring characteristics about any consumer. Therefore, we are not required to include a “Limit My Sensitive Personal Information” link on our website.

Compass may also collect personal information such as one’s physical likeness via online career social networking sites such as LinkedIn.com, and current/former salary, veteran status, and possible disabilities that you may have provided during the application process, but which is not required to be submitted.

Data Retention

We will retain your applicant/employee information and documentation for the retention period required by law, and may occasionally retain it beyond the required period, if deemed to be reasonably necessary to fulfill an ongoing business need (for example, account recovery), or to comply with applicable tax, legal or accounting requirements.

When we have no ongoing legitimate business need to use your user information, we will either delete or anonymize it, or if this is not possible (for example, because your personal information has been stored in back-up archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. When we dispose of personal information, we use reasonable procedures designed to erase or render it unreadable (for example, shredding documents and wiping electronic media).

The following principles help guide the length of our retention of records involving personal information:

- Minimize retention periods to protect the privacy of our users, while adhering to governing regulations.
- Maintain appropriate retention periods to ensure the support, operations, and security of the Compass environment.
- Leverage Legal Counsel to determine when it is appropriate to share data beyond Compass or third party vendors we contract with, or concerning the preservation of data in response to litigation or law enforcement requests.

Please note that Personal Information does not include publicly available information that is lawfully made available from federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience; or de-identified or aggregated consumer information.

Consumer Rights

California consumers have certain legal rights related to their Personal Information, as described in greater detail below:

- The right to request information about personal information collected about you;

- The right to request disclosure of categories of personal information a business shares or discloses;
- The right to access personal information in a portable format;
- The right to opt out of the sharing of personal information to a third party;
- The right to correct your inaccurate personal information;
- The right to request deletion of personal information; and
- The right to equal service and price, regardless of whether they exercise their privacy rights.

Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that Compass disclose the Personal Information it collects, uses, and discloses about you to third parties.

Upon our receipt of a verifiable request, you will receive the following information about you:

- a. Categories of Personal Information Compass has collected;
- b. Categories of sources from which that Personal Information was collected;
- c. The business or commercial purpose for which the Personal Information was collected;
- d. The categories of third parties with whom Compass disclosed the Personal Information for a business purpose; and
- e. The categories of Personal Information that Compass disclosed to third parties.
- f. Specific pieces of Personal Information Compass has collected about you.

This information will be provided to you free of charge, unless Compass determines that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

Right to Opt-Out of Third-Party Sharing (Do Not Sell/Share My Personal Information)

You have the right to request that Compass and our service providers not sell or share certain Personal information that Compass has collected from you to a third party, outside of information necessary to conduct certain business purposes (ie: payroll/HR functions). You can exercise that right at any time, by clicking the “Do Not Sell/Share My Personal Information” link available on our website in our dedicated privacy portal. You can also request an opt out by emailing us at: opt-out@compass.com.

Right to Correct

You have the right to request that Compass correct inaccurate Personal information about you that Compass maintains. We may request documentation from you to determine the accuracy of the information we have maintained. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used or maintained by us for the

purpose of correcting your personal information and complying with our recordkeeping requirements under the CCPA and/or CPRA.

We may deny your request if we have previously denied your same request to correct an alleged inaccuracy in the past six (6) months, unless you provide new or additional documentation that the information at issue is inaccurate.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

Right to Deletion

You have the right to request that Compass and our service providers delete certain Personal Information about you that Compass has collected from you, or shared with service providers. Compass shall delete your Personal Information upon receipt of a verifiable request.

Please note that this disclosure is required pursuant to California law. As an applicant the personal information we collect from you may be used to process your candidacy for employment with Compass or employment and enrollment benefits or administration. Therefore, Compass may be unable to delete any personal information that is necessary to process payroll, benefit administration, or other HR functions.

Your deletion rights are subject to several legal exceptions, and we are not required to comply with a request to delete your Personal Information if it is necessary for Compass or our service providers to maintain the Personal Information for the following reasons, and applicable law permits our retention of your Personal Information:

- Provide a good or service requested by the consumer, or reasonably anticipated by the consumer within the context of a business' ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the California Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the business' deletion of the information is likely to render impossible or seriously impair the ability to complete such research, if the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business and compatible with the context in which the consumer provided the information.
- Comply with a legal obligation.

Submitting A Verified Consumer Request

You can submit your verified consumer request to know information, correct information, or delete information by emailing us at opt-out@compass.com. You may also submit these requests through a webform located online within our dedicated Privacy Center.

The response to a request to know will provide all personal information collected and maintained about you since January 1, 2022, unless doing so proves impossible or would involve disproportionate effort. Please note that we are not required to provide personal information to you more than twice in a twelve (12) month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We will not charge you a fee for making a request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will either treat it as if it had been submitted in accordance with our designated methods or provide you with information on how to submit the request or remedy any deficiencies.

Once we receive your verifiable consumer request, we will confirm receipt of the request within ten (10) business days. We will respond to your request within forty-five (45) calendar days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

If requests from you are unfounded or excessive, in particular because of their repetitive character, we may either charge a reasonable fee or refuse to act on the request, notifying you of our reason for refusing to act. If we determine that the request warrants a fee, we will notify you of the reason for that determination and provide you with a cost estimate before completing your request.

Please note that, in responding to your request, we are not permitted to disclose or provide you with your Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data generated from measurements or technical analysis of human characteristics. However, we will inform you with sufficient particularity that we have collected the type of information without disclosing the actual data.

Verifying Consumer Requests

Compass provides California Consumers with the ability to submit requests through a webform located on our website, and our email address opt-out@compass.com. Compass must verify that the person requesting information or deletion is the California Consumer about whom the request relates in order to process the request. To verify a California Consumer's identity, we may request up to three pieces of Personal Information about you when you make a request to compare against our records. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity. Making a verifiable consumer request does not

require you to create an account with us. We will only use Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. Compass reserves the right to take additional steps as necessary to verify the identity of California Consumers where we have reason to believe a request is fraudulent.

Authorized Agents

You may choose a person registered with the California Secretary of State that you authorize to act on your behalf to submit your requests ("Authorized Agent"). If you choose to use an Authorized Agent, Compass requires that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with Compass. Failure to do so may result in Compass denying your request.

Our webform includes an affidavit to submit if an agent is submitting a consumer request on behalf of a California consumer. Alternatively, an authorized agent may e-mail proof of signed permission along with a copy of their identification and have the consumer directly confirm with us that they provided permission to submit the request on their behalf, by sending an e-mail to opt-out@compass.com.

Right to Equal Service

Compass will not discriminate against you because you exercised any of your rights, including, but not limited to, by retaliating against you, as an employee, applicant for employment, or independent contractor.

We comply with all applicable California law when providing the Services and honoring your right to equal service. Please note that any differential in Services offered may be related to the amount or quality of data or information we have compiled about you as that data or information is required for the Services, and not on your right to equal service under the CCPA and/or CPRA.

Sell/Share Applicant Information

We only provide your personal information to third parties for the purpose of obtaining contracted or requested services, or to carry out a business purpose such as information security support, or employment/HR services. The categories of some third party service providers that we may provide your information with includes: internet service, data analytics, government entities, operating systems and platforms, social networks, cloud storage, payment processors, web hosting, e-mail distribution service, help desk, financial and accounting, and cybersecurity providers. Outside of this stated business purpose, Compass does not sell or share applicant information.

We do not use or disclose "sensitive personal information", for purposes beyond the minimum purposes permitted under the CCPA or CPRA.

California Privacy Rights: Online Privacy Protection Act ("CalOPPA")

California's Online Privacy Protection Act (Bus. & Prof. Code § 22575) requires operators of a commercial website or online service that collect personally identifiable information as defined under CalOPPA ("PII") about California consumers through the Internet to satisfy certain requirements. If you want to review and request changes to the handling of your PII, collected through the Site (as defined in the Privacy Policy) or our Services, please send an email to opt-out@compass.com or send us a request via our dedicated Privacy Center.

Tracking Disclosures: We do not use tracking technology as it concerns our applicants.

Changes to this Notice

We may amend this CA Privacy Notice from time to time. Use of information we collect now is subject to the Privacy Policy as supplemented by this CA Privacy Notice in effect at the time such information is collected unless we obtain your consent for another purpose. If we make material changes to this CA Privacy Notice, we will publicly post an updated version of this CA Privacy Notice for your review. A user is bound by any changes to the Privacy Policy and CA Privacy Notice when he or she uses the Services after such changes have been first posted.

Questions Or Concerns?

If you have any questions or concerns regarding privacy using the Services, please send us a detailed message to opt-out@compass.com.

For more information, please review our Privacy Policy (<https://www.compass.com/legal/privacy-policy>).