



CALIFORNIA CONSUMER PRIVACY ACT NOTICE (CCPA)

Effective Date: 1/1/20

Information We Collect

The California Consumer Privacy Act of 2018 (“CCPA”) imposes specific obligations on businesses processing personal information of California residents. Pursuant to the CCPA, SEGA of America and its affiliates and subsidiaries (collectively “the Company”) is required to provide its employees, job applicants and contractors who are California residents a notice, used at or before the point of collection of such Personal Information, that identifies the categories of Personal Information that may be collected and why the Company collects such information.

We collect Personal Information, as defined under the CCPA, that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("Personal Information"). We may collect Personal Information from you in a variety of different situations, including, but not limited to in-person interviews, applications, on our website, your mobile device, through email, in physical locations, through the mail, and/or over the telephone. More specifically, the Company collects the following categories of Personal Information from California employees or potential employees:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal 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 section 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, or any other financial information, medical information, health insurance information or health information such as body temperature in circumstances permitted by law. Some personal information included in this category may overlap with other categories.	Yes

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.	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, 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.	Yes
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.	Yes

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 products and services you participate in such as direct deposit or 401(k) retirement options.
- Indirectly from you. For example, from observing your actions at work.
- From third parties. For example, from contacting your referral sources.

Purposes for Collecting Your Personal Information

The Company collects the personal information identified above for one or more of the reasons listed below.

- To Recruit Employees, including to conduct employment related background screening.
- To Administer Benefits, such as medical and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance, and accident management.
- To Pay and Reimburse for Expenses, including salary administration, payroll management, payment of expenses, and to administer other compensation payments.
- To Conduct Performance-Related Reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring.
- To Monitor Work-Related Licenses and Credentials, including provisioning software licenses for use in the course of an employee's work-related responsibilities, ensuring compliance, training, examination, and other requirements are met.
- To Provide Our Employees with Human Resources Management Services, including providing employee data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of employee claims, and travel administration.
- To Administer Assignments, including relocation services, documenting assignment terms and conditions, initiating vendor services.
- To Maintain Your Contact Information, including altering your details across relevant entities within the Company group of companies (for example personal, other employment and transferring roles).
- To Assist You in Case of Emergency, including maintenance of contact details for you, and your dependents in case of personal or business emergency.
- To Monitor Eligibility to Work in the U.S., which means monitoring and ensuring compliance of employees' ability to work in the U.S.
- To Conduct Healthcare-Related Services, including conducting pre-employment and employment-related medical screenings for return-to-work processes and medical case management needs; determining medical suitability for particular tasks; identifying health needs of employees to plan and provide appropriate services, including operation of sickness policies and procedures; and providing guidance on fitness for travel.
- To Facilitate Better Working Environment, which includes conducting staff surveys, providing senior management information about other employees, and training.
- To Ensure a Safe and Efficient Working Environment, which includes the Company actions relating to disciplinary actions, and code of conduct processes and investigations.
- To Maintain Security on the Company Websites and Internet Connected Assets, which includes hosting and maintenance of computer systems and infrastructure; management of the Company software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and Internet access.
- To Comply with Applicable Law or Regulatory Requirements, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic and Health, Safety, Security and Environmental reporting.
- As otherwise described to you when collecting your Personal Information or as otherwise set forth in the CCPA or subsequently agreed to by you.

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. We share your personal information with the following categories of third parties:

- Service providers.
- Job locations / hiring companies.

Disclosures of Personal Information for a Business Purpose. In the preceding twelve (12) months, the Company has disclosed the categories of Personal Information as noted above.

Sales of Personal Information. In the preceding twelve (12) months, the Company has not sold Personal Information in any of the above categories.

Other California Privacy Rights

California's "Shine the Light" law (California Civil Code Section 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. We do not disclose your Personal Information to third parties for their direct marketing purposes.

Changes to Our CCPA Employee Privacy Notice

The Company reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice to our Website.

Contact Information

If you have any questions or comments about this notice, the ways in which the Company collects and uses your information, your choices, and rights regarding such use, or how to exercise your rights under California law, contact us at:

E-mail: HR@soaamerica.com

Postal Address: SOA Human Resources, 6400 Oak Canyon, Irvine, CA 92618