# **Employment Candidate Privacy Notice**

Last updated: December 29, 2020

This Employment Candidate Privacy Notice ("Notice") explains the collection, use, and sharing of Personal Information (defined below) of applicants and prospective employees and workers ("Candidate(s)"). This Notice applies to McGee Air Services. If a Candidate is hired for employment, we will use and retain Personal Information as described in our Employee Privacy Notice.

This Notice is not intended to create any rights beyond those that exist by virtue of applicable privacy and data protection law.

### **Personal Information We Collect**

Personal Information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular Candidate or Candidate's household. It includes:

- contact information and identifiers, such as first and last name, online identifiers, account and user names, aliases, IP address, email addresses, home and postal addresses, telephone numbers, signatures and other identifiers described in the sensitive information category below;
- facial images and audio information, such as photos, videos, and voice recordings;
- demographic data, such as age including date of birth, gender, marital status, spouse and dependents, and certain sensitive data categories, described below;
- professional and background information, such as resumes/CVs, references, recommendations, academic and education background and qualifications, work skills and experience, professional certifications and registrations, language capabilities, training courses attended, work and salary history, results of credit history and criminal background checks, results of drug and alcohol testing, health screenings or certifications, and driving and vehicle licensing and history;
- personal vehicle information, such as license plate, color, year, make, and model;
- work permit status, such as immigration, residency, and related information;
- benefits information, such as information for determining benefits and cost estimation, (which may require information about gender, age, including birthdate, marital status, and personal information of spouse and dependents);

- travel information, such as loyalty programs numbers; dates and length
  of travel; hotel names and locations; travel routes and departures, stops,
  and destination points;
- analytics or monitoring data, including as related to Candidate communications and use of McGee devices, systems, wifi, internet service, internal and external websites, equipment, applications, databases, network resources, and infrastructure, ("McGee Systems") and personal devices used to connect to McGee Systems, including usernames; passwords; system log data such as IP address, browser type and language, device information, access times, and referring website addresses; information collected through web beacons, like cookie IDs and mobile device IDs; usage data, such as time spent on McGee Systems, features used and actions taken in McGee Systems, including page views, links clicked, and documents downloaded; contents, header, metadata, delivery and access information for voice calls, voicemail, emails, chats, messaging, documents, and other communications, data, and files stored or transmitted through McGee Systems in compliance with the Information Security and Technology policies;
- social media data, such as public profiles, posts, likes, and replies;
- sensitive data, such as
  - government-issued identifiers including, social security, taxpayer identification, driver's license, and national/ID passport numbers;
  - criminal offenses;
  - biometrics;
  - information about protected classes; such as
    - o race/ethnic and national origin;
    - o religious creed;
    - physical, medical, or mental health or condition and related accommodations;
    - marital status;
    - o gender;
    - o age; and
    - sexual orientation where permitted by law and on the basis of voluntary and consensual disclosure; and
- **other information** necessary for a legitimate human resources, business, security, or safety-related purpose.

## **Third Party Sources of Personal Information**

McGee collects Personal Information from a variety of third-party sources, including as follows:

- Service Providers (e.g., expense reimbursement services)
- Background Check Services
- Online Sources (e.g., LinkedIn)
- Open Government Databases

• Insurance and Benefits Providers

## **Purposes of Use**

McGee collects, uses, retains, and discloses Personal Information as appropriate to administer and carry out the recruitment and hiring process, including for human resources purposes, and for operational and business, safety, and security purposes and as described in this Notice and below.

Purposes of Use	Categories of Personal Information
Human Resources Uses	
Recruitment and hiring decisions	Contact information and identifiers; professional and background information; benefits eligibility information; analytics or monitoring data; sensitive data
Interview travel and expense reimbursement processing	Contact information and identifiers; travel information; analytics or monitoring data
Benefits eligibility determination	Contact information and identifiers; benefits information; analytics or monitoring data, sensitive data
Equal employment opportunity, diversity, inclusion and accessibility programs	Contact information and identifiers; sensitive data
Legal and policy compliance administration and enforcement, including for the purpose of antidiscrimination laws and government reporting obligations	Contact information and identifiers; facial images, and audio information; demographic data; professional and background information; personal vehicle information; work permit status; analytics or monitoring data, sensitive data
Business Uses	
Managing, monitoring, protecting, and improving, McGee Systems, assets and resources, including managing and protecting unauthorized access and use of McGee, personal and customer data, devices, systems, and infrastructure; and protecting McGee networks from intrusions.	Contact information and identifiers; facial images, and audio information; demographic data; professional and background information; travel information; analytics or monitoring data; sensitive data

Managing, monitoring, protecting, and improving campus, parking, buildings, office space, conference rooms, facilities, catering and café services, including monitoring and administering building occupancy and campus parking and transportation; operating and monitoring physical security systems, such as CCTV, key card entry systems, and guest logs; registering personal vehicles and logging exit and entry times; and emergency notification services.	Contact information and identifiers; facial images, and audio information; demographic data; professional and background information; personal vehicle information; travel information; analytics or monitoring data; sensitive data
Managing and improving workplace efficiency and effectiveness.	Contact information and identifiers; facial images, and audio information; demographic data; travel information; analytics or monitoring data; sensitive data
Communications and collaboration.	Contact information and identifiers; facial images, and audio information; demographic data; travel information; analytics or monitoring data; sensitive data
Delivery of information, goods and services.	Contact information and identifiers; sensitive data
Legal and policy compliance administration and enforcement, including monitoring access and use of McGee Systems.	Contact information and identifiers; visual, facial images, and audio information; demographic data; professional and background information; travel information; analytics or monitoring data; sensitive data
Research and improvement of McGee Systems, processes, products, services and technology.	Contact information and identifiers; visual, facial images, and audio information; demographic data; professional and background information; travel information; analytics or monitoring data; sensitive data

If you become a McGee employee, Personal Information that was collected as part of the application and hiring process will become part of your employee file and will be used for Human Resource Uses and Business Uses.

### **Sharing of Personal Information**

We share Personal Information with your consent or for purposes described in this Notice. For example, we share Personal Information with:

- Our subsidiaries and affiliates. For example, McGee entities may share business processes and common data systems.
- Vendors or agents working on our behalf. For example, companies we've hired to provide recruiting, hiring, travel, and administrative services; or protect and secure our systems and services.
- Independent third parties. For example, benefits partners to facilitate benefits onboarding and selection, (e.g., health and insurance providers) and with third-party product or service providers (e.g., travel agents and services). To the extent that you provide, or consent to our providing, Personal Information to third parties, that Personal Information is governed by their privacy statements.

We may also disclose Personal Information as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of our business or assets.

We will also access, transfer, disclose, and preserve Personal Information when we believe that doing so is necessary to:

- comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies;
- operate and maintain the security of McGee Systems, including to prevent or stop an attack on our computer systems or networks:
- protect the rights or property or ourselves or others, including enforcing our agreements, terms, and policies; or
- act in urgent circumstances such as protecting the health or personal safety of a candidate, employee, agent, customer, user of McGee services, or member of the public.

Finally, we may share de-identified information in accordance with applicable law.

## **Updating Your Information**

You can view, update certain information and make certain communication choices by logging in to the relevant portions your Candidate profile.

#### **Changes to This Notice**

McGee may occasionally update this Notice to reflect changes as required by law or by McGee practices or procedures. If we make material changes to this Notice, or in how we use Candidate's Personal Information, we will provide notice or obtain consent regarding such changes as may be required by law.

#### **Contact Information**

Candidates may contact their recruiting representative with any questions or complaints regarding McGee's compliance with this notice.