

Last Updated: 10/2/25

Introduction and Scope

SpyCloud, Inc. ("SpyCloud," "we," or "us") provides this California Employee Privacy Notice in compliance with the California Consumer Privacy Act (CCPA) of 2018 and the California Privacy Rights Act (CPRA) of 2020. This Notice applies to California residents who are job applicants or employees of SpyCloud. It explains what personal information we collect, why we collect it, how we use and share it, and your rights under the CCPA. SpyCloud is committed to protecting the privacy and security of the personal information you provide to us. Under the CCPA/CPRA, you have the right to know what personal information we collect about you and the purposes for which we use it.

Personal Information We Collect

Direct Collection by SpyCloud: SpyCloud collects certain personal information directly from you when you apply for a job or during the course of your employment. This includes:

- **Identifiers and Contact Details:** Your name, email address, telephone number, physical address, and other contact information that you provide to us (e.g. mailing address, mobile number).
- **Application and Employment Information:** Any information you submit as part of your job application or onboarding, such as your resume/CV, cover letter, work history, educational background, and professional qualifications. We also maintain work-related records if you become an employee (e.g. job title, department, start date).
- **Communication Records:** If you communicate with us (for example, through emails or via our application portal), we may keep records of those communications as part of your file.
- **Emergency Contact Details:** If you are hired, we may collect contact information for your emergency contact or beneficiaries (e.g. name and phone number of a spouse or other contact), which you provide voluntarily.

Please note: SpyCloud uses a third-party background check provider to conduct pre-employment screenings. That provider may collect additional personal information (such as Social Security number, date of birth, criminal or credit history) under its own privacy

notice and legal disclosures. This Privacy Notice does not cover personal data collected by the background check company, which provides a separate disclosure (for example, under the federal Fair Credit Reporting Act) for its screening process. SpyCloud will obtain your authorization before any background check, and the details collected for that check are handled by the vendor according to their own notice.

Purposes of Collection and Use

We collect and use the personal information described above for various business and operational purposes, consistent with California law. These purposes include:

- **Recruitment and Hiring:** To process and evaluate your job application, verify your qualifications and references, communicate with you about interviews or job offers, and make hiring decisions. For example, we use your contact information to schedule interviews and notify you of application status.
- **Communication:** To communicate with you regarding your employment or application. We use your email, phone, or address to send important notices, respond to your inquiries, and provide information about onboarding or employment matters.
- **Employment Administration:** If you become a SpyCloud employee, to administer day-to-day employment needs. This includes using your information for payroll and benefits enrollment, maintaining personnel files, managing work schedules and assignments, performance management, and other human resources purposes necessary for managing the employment relationship. We only collect what is necessary for these purposes and as required by law.
- **Legal, Security, and Compliance:** To comply with applicable laws and regulations (such as employment eligibility verification and tax requirements), to enforce our workplace policies and agreements, and to ensure the security of our systems and premises. We may also use or disclose personal information as needed to meet legal requirements or respond to lawful requests (such as court orders or government audits).

Data Retention: SpyCloud will retain your personal information only for as long as necessary to fulfill the purposes described above or as required by law.

Disclosure of Personal Information

SpyCloud respects the privacy of your data and does not sell your personal information to any third parties. We also do not “share” your information for cross-context behavioral advertising purposes. When we disclose personal information, it is only for legitimate business needs or legal reasons, as described below:

- **Service Providers (Processors):** We may disclose your personal information with trusted third-party service providers who assist us in our business operations. These include, for example, human resources platforms, payroll processors, benefit plan administrators, IT support and cloud hosting services, and the third-party background check company. Such service providers are contractually bound to use your information only to provide services to SpyCloud and as required by law.
- **Legal Compliance and Protection:** We may disclose your information to government authorities or other third parties when required to do so by law, or when we believe in good faith that such disclosure is necessary to comply with a legal obligation. For instance, we may provide required data to state or federal agencies (such as for tax reporting or employment verification) or respond to a court order or subpoena. We may also share information as necessary to protect the rights, safety, and security of SpyCloud, our employees, or others (for example, disclosing relevant information to law enforcement in case of an investigation).
- **Business Transfers:** In the event of a future business transaction such as a merger, acquisition, corporate reorganization, or sale of assets involving SpyCloud, your personal information may be disclosed to the parties involved as part of due diligence or transferred as an asset. In such cases, we would ensure the recipient continues to protect your information in accordance with this Notice and applicable privacy laws.

Your California Privacy Rights

Under the CCPA and CPRA, California employees and job applicants have specific privacy rights regarding their personal information. SpyCloud is committed to honoring these rights. Subject to certain legal exceptions, you have the following rights:

- **Right to Know (Access):** You have the right to request that we disclose the personal information we have collected about you and how we have used and shared it in the past 12 months. This includes the categories of personal information collected, the sources of that information, the business purposes for collection, and the categories of third parties to whom we disclosed your information. You may also request a copy of the specific pieces of personal information we hold about you (data portability

request).

- **Right to Delete:** You have the right to request that we delete personal information we collected from you, subject to certain exceptions.
- **Right to Correct:** If you believe that any personal information we maintain about you is inaccurate or outdated, you have the right to request that we correct that information.
- **Right to Opt Out of Sale/Sharing:** You have the right to opt out of any “sale” of your personal information or sharing of your personal information for cross-context behavioral advertising. *Note:* SpyCloud does not sell employee or applicant data, nor do we share it for targeted advertising purposes. Therefore, there is currently no need for you to take any action to opt out, as we do not engage in those practices. If our practices change in the future, we will provide a clear mechanism for you to exercise this right.
- **Right to Limit Use of Sensitive Personal Information:** The CCPA permits consumers to limit the use of their “sensitive personal information” in certain circumstances. “Sensitive personal information” includes data like social security number, driver’s license number, financial account logins, precise geolocation, racial or ethnic origin, etc. SpyCloud’s policy is to only use any sensitive information you provide (for example, data collected for background checks or benefit enrollment) for the essential purposes required – we do not use sensitive data for secondary purposes like marketing. Accordingly, we do not use sensitive personal information in ways that are subject to the Right to Limit under California law.
- **Right to Non-Discrimination (No Retaliation):** SpyCloud will not discriminate or retaliate against you for exercising any of your privacy rights. This means that if you make a request related to your privacy rights, we will not deny you employment, reduce your benefits, or otherwise mistreat you because of the request.

How to Exercise Your Rights: If you wish to exercise any of your CCPA/CPRA rights as described above, you (or an authorized agent acting on your behalf) can submit a request to SpyCloud via our secure DSAR portal, which can be located here:

<https://spycloud.com/legal/dsar/>. We will respond to verifiable requests within the timeframe required by law. If we cannot fulfill your request, we will explain the reason (for example, if an exemption applies). Exercising your rights is free of charge. However, if you make repetitive or excessive requests, the law permits us to charge a reasonable fee or refuse the request in certain circumstances.

Contact Information

If you have any questions about this Privacy Notice or SpyCloud's privacy practices, please contact us at privacy@spycloud.com.

- **Mail:** SpyCloud, Inc., 2130 S. Congress Ave, Austin, TX 78704, USA
- **Phone:** 1-512-387-8158

Please indicate that you are a California employee or applicant making a CCPA/CPRA inquiry so we can direct your question appropriately. We will be happy to assist you with any questions or concerns regarding your personal information.

Updates to This Notice: SpyCloud may update this Employee Privacy Notice from time to time to reflect changes in our practices or to comply with new legal requirements. If we make material changes, we will provide an updated notice through official company channels or during the application process. Your continued employment or application with SpyCloud after any updates signifies your acknowledgment of the revised Notice. We encourage you to review this Notice periodically for the latest information on our privacy practices.