

Crew Training International, Inc.

Privacy and Data Security Policy

At Crew Training International Inc., we take privacy and security seriously. This privacy policy outlines how Crew Training International Inc. and its partners (collectively "the company", "we", "our", or "us") process information that is generated through our website about you, mobile apps, and other online services (collectively "the services"), and when you otherwise interact with us through our service channels.

If you are a California resident, the California Consumer Privacy Act (CCPA) covers data collected from job applicants and employees. Covered employers must provide notice to employees, job applicants, emergency contacts, beneficiaries, independent contractors, and members of board of directors as they have the same rights as any other consumer when collecting their personal or sensitive information.

California residents can see additional choices about their information, including the right to access or delete their information, sell or share information, and request the right to limit the use of information under the California Privacy Disclosure section of the privacy policy.

TYPES OF INFORMATION COLLECTED AND HOW WE COLLECT THEM

The three general categories of personal information we collect: (1) Information you provide to us, (2) Information we automatically, and (3) Information we collect from a third party.

Information you provide includes but not limited to the following:

- 1. Personal Information:** is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.
- 2. Sensitive Personal Information:** includes anything that reveals an individual's personal information, such as Social Security number, driver's license number, state identification card, passport number, account log-in, password, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, or union membership.
- 3. Usage Information:** information about how you access and use our services: such as your actions on the services, your interactions with others on the services, photos and documents you upload to the services, usernames, and other content you provide. By using the services, you consent to the recording, storage, and disclosure of such information you send or receive for these purposes.

- 4. Additional Information:** information that you submit via job applications or other similar means. Such information may be collected directly from you, reference(s), recruiter(s), or prior employer(s). We will only use this information to evaluate your candidacy, process your application, assess your qualifications, correspond with you, and comply with legal obligations.

Personal & Sensitive Personal Information Collected Automatically:

As is true of many digital platforms, we may collect certain personal and/or sensitive personal information automatically when you use our services:

Usage and Device Data Collected Automatically through Tracking Technologies.

To provide a personalized and enhanced user experience, our third-party partners and we may automatically collect certain types of usage information when you visit or use our services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies including: cookies, flash objects, web beacons, embedded scripts, location identifying technologies, file information, and similar technologies. For example, we collect information about your device and its software, such as your IP address, browser type, internet service provider, platform type, device type, operating system, date and time stamp, a unique ID (that allows us to uniquely identify your browser, mobile device, or your account), and other similar information. This privacy policy covers the use of our tracking technologies and not that of any of our other partners.

Personal & Sensitive Personal Information from Third Parties: We also obtain personal and/or sensitive personal information from third-party partners, which we often combine with information we may collect either automatically or directly from you.

- 1. Third-party data** that we collect from businesses and vendor partners. Our third-party partners may encompass links on their sites that lead to our company webpage. Upon interacting with a third party, they may operate under their own privacy and security policies and terms of use. We require that all third parties affiliated with Crew Training International Inc. comply with our privacy policy in order to keep your information safe and secure. We strongly encourage third parties prohibit from sharing and selling your information.
- 2. Account Linking** Crew Training International Inc. offers email account linking with the Department of Defense and their individual service branches. By utilizing these linking services, you acknowledge and agree to the terms and conditions of the Department of Defense, and their individual service branch's privacy policy that governs such information. Further, you grant Crew Training International Inc. the

right, power, and authority to access and transmit your information as reasonably necessary to provide the linking services to you.

3. **Third-Party Services** used to link, connect, or log into your Crew Training International Inc. account may send us your profile information from that service. The information provided and controlled by third-party partners may vary, or as authorized by you via your privacy settings display during the usage of the service.

HOW WE USE YOUR INFORMATION

Except as expressly set forth herein, **We Do Not Sell** your personal or sensitive personal information.

We may share your information with third parties under the following circumstances:

1. Partners, service providers, and any other affiliates that Crew Training International Inc. believes are able to provide employees with services that relate to their request. In each case, you will have agreed to receive such information.
2. With other third-party partners, if we believe it is necessary to comply with applicable laws, respond to governmental inquiries, comply with valid legal processes, or protect the rights or property of Crew Training International Inc. or other services.
3. In connection with or during the negotiation of any merger, sale of company stocks or assets, financing, acquisition, divestiture, or dissolution of all or a portion of the business. This privacy policy will bind any successor company unless modified as described by this policy.

DATA RETENTION

We generally retain your personal and/or sensitive personal data as long as you keep your account open or as needed to provide you services. This includes data you or others provided to us, data generated, or inferred from your use of our services.

RIGHTS TO ACCESS AND CONTROL YOUR PERSONAL DATA

For personal and/or personal sensitive data that we have about you, anyone can request the following:

- **Delete Data:** You can ask us to delete all or some of your data (e.g., if it is no longer necessary to provide services to you).

- **Change or Correct Data:** You can edit all or some of your data through your account. You can also ask us to change, update, or fix your any of your data if it is inaccurate.
- **Object to, limit, or restrict use of data:** You can ask us to stop using all or some of your data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your data is inaccurate or unlawfully held).
- **Right to Access:** You can ask us for a detailed copy of your information and the reason for its usage.

Anyone who wishes to request further information about our compliance with these privacy practices and policies; can email us at HROffice@cti-crm.com or write to Crew Training International Inc., Human Resources Department, 9198 Crestwyn Hills Dr., Memphis, TN 38125.

SECURITY

We work hard to safeguard your data using a range of technological and organizational security controls.

We strive to protect the security of our computer storage and network equipment, by using security procedures that require employees to authenticate themselves to access your data information. Also, we limit the access of your information to those with jobs only requiring such access. We require callers and online users to authenticate themselves before providing employee account information.

Crew Training International Inc. does not guarantee your information will ever be disclosed in a manner that is inconsistent with this policy. If a breach were to occur, we will give you reasonable notice as required by applicable law.

CALIFORNIA PRIVACY DISCLOSURE

We comply with special legal requirements for California residents associated with access and deletion of data. We fully describe our practices in our privacy policy, but use this separate notice to ensure that we meet the CCPA's (**California Consumer Privacy Act**) requirements.

CCPA requires us to disclose whether we sell your personal and/or personal sensitive information. **We do not sell your personal and/or sensitive personal information.**

Personal Information: is defined by California law as information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked directly or indirectly with California residents.

Sensitive Personal Information: includes anything that reveals an individual's personal information, such as Social Security number, driver's license number, state identification card, passport number, account log-in, password, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, or union membership.

Crew Training International Inc. fully discloses these and other examples in the **Types of Information Collected and How We Collect Them** section of the company privacy policy.

[California residents have the right](#), in certain circumstances, to request information about whether a business has disclosed personal and sensitive personal information to any third party for their direct marketing purposes.

THE INFORMATION WE COLLECT AND SHARE

We want to provide you with the information about how to exercise rights involving CCPA PI.

Companies that collect personal and/ or sensitive personal information from California residents and disclose such information to third parties must in response to a request: provide a list detailing the categories of information shared, the partners to which such information was provided, or provide a mechanism by which an employee may opt-out of having their information shared with third parties. If an employee elects to opt-out of sharing their information with a third party, they may send an email to HROffice@cti-crm.com, mail to Crew Training International Inc., Human Resources Department, 9181 Crestwyn Hills Dr., Memphis, TN 38125, or by calling the toll free number below.

[1-800-752-8839](tel:1-800-752-8839)

Revised on 12/8/2022

For more information on the collection and usage of your information, please read our company privacy policy in its entirety.

Personally Identifiable Information (PII) Report Request

In accordance with the California Consumer Privacy Act (CCPA), residents may request a report of personal information collected by Crew Training International Inc. within the past (12) months to include: categories from which such information was collected, the purpose of such collection, and the categories of third parties with whom your information was shared. The report will be provided within forty-five (45) calendar days from the request submission date upon verification of your identity. You may opt to receive your report electronically or by postal mail. To request your report, email the Human Resources Department at HROffice@cti-crm.com, mail to Crew Training International Inc., Human Resources Department, 9181 Crestwyn Hills Dr., Memphis, TN 38125, or by calling the toll-free number below.

[1-800-752-8839](tel:1-800-752-8839)

Personal and Sensitive Personal Information Deletion

As a California resident, you have the right to request that some or all of your information be deleted from our systems. All information removal requests will be processed within (45) days of receipt of the request. If you would like any of your information deleted, email the Human Resources Department at HROffice@cti-crm.com, mail to Crew Training International Inc., Human Resources Department, 9181 Crestwyn Hills Dr., Memphis, TN 38125, or by calling the toll-free number below.

[1-800-752-8839](tel:1-800-752-8839)

Your Right to Notification

Under the CCPA Crew Training International Inc. will not collect new categories of personal and/or sensitive personal information, or use them for materially different purposes without first notifying you.

Right Not to be Discriminated Against

The CCPA prohibits businesses from discriminating against you for exercising your rights under the law. Such discrimination may include: denying services, charging different prices or rates for services, providing a different level or quality of services, or suggesting that you will receive a different level or quality of services as a result of exercising your rights.

Any resident who wishes to request further information about our compliance with these privacy practices and policies, can email us at HROffice@cti-crm.com, mail to Crew Training International Inc., Human Resources Department, 9198 Crestwyn Hills Dr., Memphis, TN 38125, or by calling to toll- free number below.

[1-800-752-8839](tel:1-800-752-8839)

CHANGES TO PRIVACY POLICY

Crew Training International Inc. reserves the right to update or modify this privacy policy at any time. If we make material changes to the policy, we will provide notice through our services or by other means to provide you the opportunity to review the effective changes. The provisions contained in this privacy policy supersede all previous notices or policies regarding our privacy practices. We encourage you to check our website frequently to see the current privacy policy or any recent updates made to the policy. We are committed to protecting your information.