

# Notice at Collection for California Applicants

## FirstGroup America and its affiliated companies

*Last Revised:* October 15, 2021

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FirstGroup America, Inc. and its affiliated companies operating in California (“**FirstGroup**”) collect and use personal information from and about you in connection with your application for employment with us as described in this Notice.

Without limitation, FirstGroup America’s affiliated companies include First Student, Inc. and First Transit, Inc.

### **1. What do we mean by personal information?**

When we say “**personal information**” we mean information that can be used on its own or with other information to identify, contact, or locate a single person or household.

Personal information does not include information that has been anonymized, aggregated or de-identified so that it is no longer associated with (or can no longer be used to identify) a particular person or household. In some cases, personal information excludes information that is publicly available.

### **2. What types of personal information do we collect from and about job applicants?**

Below are the categories of personal information we collect and the purposes for which we intend to use this information:

- **Identifiers**, including
  - Identifying information, such as your full name, gender, and date of birth.
  - National identifiers, such as SSN, passport and visa information, and immigration status and documentation.
  - Contact information, such as your home address, email addresses, and emergency contact information.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))**, including information such as your name, signature, telephone numbers, and SSN
- **Health and safety information**, such as a health condition (if relevant to your employment). In addition, we may request your COVID-19 vaccination status if you are applying to work at a location with a vaccination mandate.
- **Protected classification characteristics under California or federal law**, including demographic data, such as race, religion, ethnic origin, marital status, medical condition, disability, and veteran or military status. If you request an exemption from a COVID-19 vaccination requirement to be able to work at a location with a vaccination mandate, we may request information from you related to that exemption request.
- **Professional or employment background**, such as your work history, academic and professional qualifications, references, and notes taken during phone screens and interviews.

- ***Non-public education information*** (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)), including educational records.
- ***Internet or other similar network activity***, including information systems (IS) information, such as your search history, browsing history, login information, and IP addresses on FirstGroup's information systems and networks.
- ***Biometric information***, such as fingerprints. Governmental entities and/or third-party service providers may collect fingerprints on our behalf to perform criminal background checks to comply with state mandates and requirements in our contracts with our customers. In some but not all cases, we receive a copy of such information.
- ***Geolocation data***, such as time and physical location related to use of an internet website, application, device, or physical access to a FirstGroup office location.
- ***Inferences drawn from other personal information***, including a profile or summary about your job preferences and skills.

### ***3. Use and disclosure of personal information***

FirstGroup may collect, use, and disclose your personal information for the purposes of carrying out our application and recruitment process and for our own legitimate business purposes including to:

- Comply with all applicable laws and regulations, legal processes, enforceable government requests, and corporate governance requirements.
- Identify and evaluate job applicants.
- Communicate with you about the recruitment process, your application, and current and future career opportunities with FirstGroup America. If you share your geolocation data, we may use this information to locate jobs near you.
- Verify your information including your eligibility for employment and/or that you have the appropriate qualifications and/or skills for the job you are applying for.
- Carry out employment, background, and reference checks, subject to your consent where required by applicable law.
- Investigate and enforce compliance with and potential breaches of FirstGroup policies and procedures.
- Analyze and improve our application and recruitment process.
- Keep records related to our hiring processes.
- Protect the rights and property of FirstGroup America, its employees, affiliates, other job applicants, customers, the public, or others as required or permitted by law.
- Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the FirstGroup.
- Administer and maintain our operations, including for safety purposes.
- Exercise or defend the legal rights of the FirstGroup and its employees, affiliates, agents, customers, contractors, and agents.

#### ***4. Changes to this Notice***

This Notice is reviewed periodically to ensure it accurately captures all types of personal information collected or any additional or different processing of such personal information. We may, therefore, change this Notice at any time and will update the “Last Revised” date accordingly. If we make material changes, we will notify you in a more direct manner, such as via email.

#### ***5. Who can you contact for more information?***

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please our privacy office as follows:

Email: USPrivacy@firstgroup.com

Regular mail: FirstGroup Privacy Office  
c/o FirstGroup America, Inc.  
600 North Vine Street, Suite 1400  
Cincinnati, Ohio 45202  
USA