

PRIVACY POLICY

Effective Date/Last Updated: **April 20, 2025**

Cornell Pace Inc. (the “Company”, “we” or “us” or “our”) is committed to protecting the privacy of your personal information. We created this Privacy Policy (“Policy”) to inform you how we collect, store, use, and protect your “personal information” or “personal data” (collectively, “personal information”), and your rights regarding that information.

Please read this Policy carefully before using this website (the “Site”) or submitting personal information to us. This Policy is incorporated into and subject to our Terms of Use [\[link\]](#). BY ACCESSING OR USING THE SITE, YOU CONSENT TO THE COLLECTION, USE, AND SHARING OF YOUR PERSONAL INFORMATION AS SET FORTH IN THIS POLICY. If you do not consent to the collection, use, disclosure, and retention of your personal information as described in this Policy, please do not provide us such information.

We reserve the right to revise this Policy at any time. If we make any material changes, we will update the date noted above. We reserve the right to provide notice of any changes in other ways as well. Your use of this Site or submission of personal information after such changes constitutes your agreement to the Policy as amended. Except to the extent we receive your authorization, or as permitted or required by applicable law, we will handle your personal information in accordance with the terms of the Policy in effect at the time of the collection.

We hope that by taking a few moments to read our Policy, you will have a better understanding of what we do with your information and how we keep it private and secure.

1. THE INFORMATION WE COLLECT

The Company may collect or has collected the following categories of personal information:

Identifiers and Contact Information. This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, account names, dates of birth, bank account information, and other similar contact information and identifiers.

Protected Classification Information. This category includes characteristics of protected classifications under California or federal law.

Commercial Information. This category includes, without limitation, products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Education Information. This category includes, without limitation, information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, Sec. 1232g; 34 C.F.R. Part 99).

Internet or Other Electronic Network Activity Information. This category includes, without limitation, browsing history, search history, or a consumer’s interactions with a website, application, or advertisement.

Geolocation Data. This category includes, without limitation, location information collected when using one of our apps, devices, or vehicles.

Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information. This category includes, without limitation, information collected from voicemail messages, while speaking with one of our service representatives, and/or by video camera.

Biometric Information. This category includes, without limitation, an individual's physiological, biological, or behavioral characteristics used or intended for use – singly or in combination with each other or with other identifying data – to establish individual identity.

Professional and Employment-Related Information. This category includes, without limitation, information regarding job applications, information related to onboarding for payroll and benefits, and information needed for evaluating performance.

Sensitive Personal Information. This category includes:

- social security, driver's license, state identification card, or passport number;
- log-in, financial account, debit card, or credit card number, in combination with any required security or access code, password, or credentials allowing access to an account;
- precise geolocation;
- racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership;
- content of mail, email, and text messages (unless we are the intended recipient of the communication); and
- information collection from a known child.

Consumer Profile. This category includes information drawn from any of the categories above to create a profile about a consumer reflecting the consumer's preferences, characteristics, and behaviors.

2. SOURCES OF INFORMATION

We may collect your personal information from the following sources:

You. We collect information you provide us – e.g., in connection with your use of our products or services or application for or employment with us. For instance, when you contact us regarding our products or services, you may provide your name, email address, and information related to the product or service you request. When you apply for a job with us, you may provide information regarding your educational and professional history. In connection with your employment with us, you may provide financial account information needed for payroll processing and government identification numbers needed to verify your identity and work authorization status.

Related Entities and Affiliates. We may collect information about you from our affiliates and other related parties.

Service Providers and Contractors. We may collect your personal information from service providers or contractors who collected information about you that is needed to provide you products or services or in connection with your application for or employment with us.

News Outlets, Social Media, Surveys, and Third Parties. In the course of performing our services or marketing activities, or in connection with your application for or employment with us, we or third parties on our behalf may conduct research and other activities that result in the collection of your personal information.

Information Collected Automatically. As you navigate through and interact with our Site, we may compile statistical information concerning your usage of the Site through analytics services, such as those provided by Google Analytics. To do so, we may collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Site, such as traffic data, location data, logs and other communication data and the resources that you access and use on the Site
- Information about your computer and internet connection, including your IP address, operating system, and browser type.
- Information about the type of device you are using, mobile ad identifiers, the time and length of your visit, and the website that referred you to our Site.
- Information about your preferences to make your use of the Site more productive, via the use of Cookies. For more information on Cookies, please see the Cookies and Other Tracking Technologies section. While all of this information can be associated with the IP address your computer had while you visited the Site, it will not be associated with you as an individual or with any other information you may submit through the Site or that we may store about you for any other purposes. We may use this information to generate aggregate statistics about visitors to our Site. Please check your web browser if you want to learn what information your browser sends or how to change your settings.

3. COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and other web technologies to collect and store certain types of information when you visit the Site. A cookie is a small file consisting of letters and numbers that automatically collect certain information from you. This file uniquely identifies and recognizes your browser or device and transmits information back to the server. Depending on the cookie type, it may perform functions such as remembering your user preferences, improving the quality of your visit, recording the website pages you view, remembering the name or address you entered during a visit, or delivering ads that are targeted to your interests and browsing activity.

Types of Cookies.

First and Third Party Cookies. First party cookies are generally placed on your computer or device by the website you are visiting. For example, we may use a first party cookie to improve website security. Third party cookies are placed on your computer or device by a source other than the website you are visiting in order to enable third-party features such as advertising, analytics, videos, or interactive content.

Essential or Strictly Necessary Cookies. These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually set in response to actions taken by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. These cookies do not store any personally identifiable information.

Performance and Functionality Cookies. Although these are non-essential cookies, they help the website perform and function as designed. For example, performance and functionality cookies may help the website display videos, enable chat sessions, or recognize whether you visited the website before.

Analytics Cookies. These cookies track your usage of the website. The information these cookies collect can be used for various purposes such as understanding how visitors use the website, site and content customization, or advertising and marketing.

Advertising Cookies. Advertising and marketing cookies perform functions such as helping customize your website experience, personalizing ads based on your online activities and interests, measuring the

effectiveness of ads, preventing an ad from reappearing, and serving you targeted advertisements. Information from these cookies may be disclosed to third parties or third parties may place these cookies on your computer or device. Advertising and marketing cookies may track your online activities.

The Site uses essential, functional, and performance cookies to function and perform as designed; analytics cookies to understand how you use the Site, improve its functionality, and other related purposes; and advertising cookies to help us with our advertising and marketing activities. We and our third-party partners and service providers may collect and track information about your online activities over time and across different websites, applications, and devices.

Embedded Content and Social Media Widgets. The Site contains embedded content (e.g., videos) and Social Media Widgets (e.g., LinkedIn). Embedded content may place third party cookies on your device that track your online activity to enhance your experience or assess the success of their application. Social Media Widgets allow us to integrate social media functions into the Site. These widgets may place third party cookies on your device for tracking and advertising purposes. We have no direct control over the information these cookies collect; please refer to the applicable third party's website privacy policy for additional information.

Controlling Cookies. You may control cookies, including preventing or stopping the installation and storage of cookies, through your browser settings and other tools. Most browsers will allow you to block or refuse cookies. However, you may need to manually adjust your preferences each time you visit a site. For more information, see the Help section of your browser. Please note that if you block certain cookies, some of the services and functionalities of our Site may not work.

IMPORTANT: BY USING THE SITE, YOU CONSENT TO THE PROCESSING OF ANY PERSONAL INFORMATION FOR THE PURPOSES AND FUNCTIONS DESCRIBED ABOVE.

Do Not Track. "Do Not Track" is a privacy preference that you can set in your Internet search browser that sends a signal to a website that you do not want the website operator to track certain browsing information about you. However, because our Site is not configured to detect Do Not Track signals from a user's computer, we are unable to respond to Do Not Track requests.

4. WHY WE COLLECT YOUR INFORMATION

In general, we will use the personal information we collect only for the purpose it was collected, for compatible purposes, as permitted or required by law, as necessary to carry out our contractual duties and obligations, and as otherwise provided in this Policy. For example, we may use your personal information in the following ways:

To Operate Our Site. We may use your personal information to enable use of this Site, provide you with information or services, or to administer the Site.

For Internal Use. We may use your personal information to: operate our business, including to provide you products or services or in connection with your application for or employment with us; review, improve, and monitor our website, applications, online services, and overall client experience; provide customization to meet specific needs; assess trends, interests, and demands of clients, applicants and employees; and carry out our obligations and enforce our rights, including those arising from any contracts entered into between you and us, including for billing, payment, and collections.

To Communicate with You. We may use your personal information to communicate with you, including sending messages about the availability of our Site, security, or other product or service-related issues. (You may change your communication preferences at any time. Please be aware that you cannot opt-out of receiving service messages from us, including security and legal notices.) We may also send you administrative or account-related information to keep you updated about your account and the Site. Such communications may include information about Policy updates, confirmations of your account actions or

transactions, security updates or tips, or other relevant transaction-related information. Site-related communications are not promotional in nature.

To Provide Support Services. We may use your personal information to provide support services and engage in quality control activities concerning our properties and services.

To Enforce Compliance with Our Terms and Agreements or Policies. When you access or use our Site, you are bound to our Terms of Use and this Policy. To ensure compliance, we may process your personal information in connection with monitoring, investigating, preventing, and mitigating prohibited, illicit or illegal activities on our Site. We may also process your personal information to: investigate, prevent or mitigate violations of our internal terms, agreements or policies; enforce our agreements with third parties and business partners; and for other purposes related to the services we provide to you, operation of our business, or your application for or employment with us.

To Ensure the Security of the Services. We may process your personal information as necessary or appropriate to protect the rights, property, security, and safety of our employees, applicants, and clients, our information systems, and the public. Keeping you safe requires us to process your personal information, such as your device information, activity information, and other relevant information. We use such information to combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not gain access to your information.

To Maintain Legal and Regulatory Compliance. Our business is subject to certain laws and regulations which may require us to process your personal information. We may also use your personal information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes.

To Engage in Marketing Activities. We may process your contact information or information about your interactions with us to send you marketing communications and keep you updated about the Site and our business; provide you with information about events or other materials; and deliver targeted marketing to you.

Other Purposes. We may use your personal information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

5. DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information for the same reasons that we may use it, as described in this Policy, which includes disclosing it to our affiliates and non-affiliates, as we deem necessary to carry out those purposes. We endeavor to choose affiliates and non-affiliates whose standards for the protection of data match ours.

The following chart describes the categories of personal information we have collected or may collect about you and, for each category, identifies the categories of third parties to whom we may disclose that information and the purposes for such disclosures.

| Categories of Personal Information | Categories of Third Parties to Whom Disclosed & Purposes for Disclosure |
|------------------------------------|---|
|------------------------------------|---|

Address and other identifiers – such as name, postal address, email address, phone number, account name, date of birth, social security number, driver’s license number, photograph, passport number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers

NOTE: The information in this category may include the following elements of Sensitive Personal Information: social security number, driver’s license number, state identification card number, and/or passport number.

Protected status – such as citizenship, ethnic background, gender, or other similar identifiers

NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial, ethnic, or national origin.

Financial information – such as bank account details, credit history, income details or other similar identifiers

NOTE: The information in this category may include the following elements of Sensitive Personal Information: log-in, financial account, debit card, or credit card number, in combination with any required security or access code, password, or credential allowing access to an account.

Commercial information – such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies or other similar identifiers

Education or professional information, including veteran status or other similar identifiers

NOTE: The information in this category may include the following elements of Sensitive Personal Information: union membership.

Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.

Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner’s privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.

Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.

6. LINKS TO THIRD-PARTY SITES AND THIRD-PARTY INTEGRATIONS

We may provide links to websites or resources outside of our Site for your informational purposes only. We may also provide links to third-party integrations. Third party integrations are websites or platforms that synchronize with our Site to provide you with additional functionality, tools, or services such as maps, sending requested information, etc.

You acknowledge and agree we are not responsible for the availability of third-party sites, resources, or integrations and do not endorse and are not responsible or liable for any content, advertising, goods, services or other materials on, available through, or provided by such sites, resources, or integrations. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of personal information that you provide, or that is collected by, such sites. We encourage you to review the privacy policies and terms and conditions on those linked sites.

7. SECURITY

We take precautions to protect data and information under our control from misuse, loss or alteration. Our security measures include industry-standard physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal information. However, no system for safeguarding personal or other information is 100% secure and, although we have taken steps to protect your personal information from being intercepted, accessed, used or disclosed by unauthorized persons, we cannot fully eliminate security risks associated with personal information.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding the password, security questions and answers, and other authentication information you use to access our Site.

8. YOUR CHOICES

You have the right to limit the information you provide us. If you choose not to provide us certain information we request, however, we may be unable to provide you access to certain of our services and/or content.

We may sometimes send you email communications about our services and content. To opt-out of receiving these communications, please email wstanley@cornellpace.com.

9. RETENTION

We retain your personal information for as long as necessary to provide you services, process your application for employment, manage your employment with the Company, and in accordance with our data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations, resolve disputes, enforce contracts, address other legitimate business needs, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors, such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements.

10. CHILDREN'S PRIVACY

Our Site is not intended for use by children under 16. Accordingly, we do not knowingly solicit or collect personal information from anyone we know to be under 16 years of age. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from children without verification of parental consent, we will take appropriate steps to remove such information from our servers.

11. APPLICABLE LAW

This Policy is governed by the internal substantive laws of Virginia without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Privacy Policy shall lie exclusively with the state and federal courts within Virginia. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

12. INTERNATIONAL TRANSFERS

When you access or use our Site, we may transfer your personal information to other countries where we conduct business. Such countries may be located outside of the country or jurisdiction where you are located and may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. If you do not want your information transferred to or processed or maintained outside of the country or jurisdiction where you are located, you should not use the Site.

13. CALIFORNIA AND TEXAS RESIDENTS

This section applies only to California and Texas residents. It supplements and amends the information contained in the Policy with respect to such individuals. The other provisions of the Policy continue to apply, except as modified in this section.

Shine the Light [California residents only]. California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by us to third parties for the third parties' direct marketing purposes. Such requests must be submitted to us in accordance with the instructions in the Contact Us section of this Policy. Please mention when contacting us that you are making a "California Shine the Light" inquiry. Within 30 days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than in accordance with the instructions specified in this paragraph.

Eraser Law [California residents only]. If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California law permits you to request and obtain removal of content or information you have publicly posted. You may submit your request using the contact information at the end of this Policy. Please be aware that such request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Your Rights.

You may have certain rights related to your personal information, subject to certain exceptions. Specifically:

Right to Know. You have the right to request that we disclose the following to you upon receipt of your verifiable consumer request:

- The categories of personal information we have collected about you
- The categories of sources from which we collected that information
- The business or commercial purposes for collecting, selling, or sharing that information
- The categories of personal information we sold or disclosed for a business purpose
- The categories of third parties to whom we sold or disclosed that information
- The specific pieces of personal information we collected about you

If you previously provided us your personal information, and that information is available in a digital format, you may have the right to obtain a copy of the information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another person without hindrance.

Right to Delete. You have the right to request that we delete your personal information from our records, subject to certain exceptions. Upon receipt of a verifiable consumer request, and as required by applicable law, we will delete and direct any service providers to delete your personal information.

We are not required to comply with deletion requests if we, or our service providers or contractors, need the subject information in order to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information to us.
- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Correct. You have the right, subject to certain limitations, to request that we correct any inaccurate personal information we maintain about you. Upon receipt of a verifiable consumer request, and as required by applicable law, we will take appropriate steps to respond to your request.

Right to Opt-Out of Selling, Sharing, Targeted Advertising, and/or Profiling. You have the right, subject to certain limitations, to opt-out of having your personal information sold or shared, or used for targeted

advertising or profiling. However, we do not use your personal information for any of those purposes, as they are defined under applicable law, and do not have actual knowledge that we have sold personal information of minors under age 16.

Right to Consent to or Limit Use or Disclosure of Sensitive Personal Information. You may have the right, subject to certain exceptions, to consent to or request limitations on the use and disclosure of your sensitive personal information, as that term is defined under applicable law. We do not use sensitive personal information to infer characteristics about data subjects nor for purposes other than those set forth in Section 7027(m) of the regulations implementing the California Consumer Privacy Act, as amended (“CCPA”). Upon receipt of a verifiable consumer request, and as required by applicable law, we will take appropriate steps to respond to your request. Additionally, where required by applicable law, we will process your sensitive personal information only with your consent.

Right Against Discrimination. You have the right not to be discriminated against for exercising any of the rights described in this section. For example, we generally will not provide you a different level or quality of goods or services if you exercise these rights.

Submitting Consumer Rights Requests

To submit a consumer rights request, please call us at (914) 380-8228 or email us at wstanley@cornellpace.com.

Verification. We reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by:

- the consumer who is the subject of the request,
- a consumer on behalf of the consumer’s minor child, or
- a natural person or business entity authorized to act on behalf of a consumer.

To verify your identity, we may ask you to verify personal information we already have on file for you. If we cannot verify your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes. Making a verifiable consumer request does not require you to create an account with us. Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond.

Authorized Agents. You may authorize a natural person or business entity to act on your behalf with respect to your rights under this section. Unless you have provided the authorized agent with a qualifying power of attorney, you must provide your authorized agent written permission, signed by you, to act on your behalf and verify the authorized agent’s identity with us. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

We may not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Our Response. You may have the right, subject to applicable law, to submit up to two (2) requests per year free of charge. We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request. We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar

days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. In the event we deny your request, in whole or in part, we will explain the bases for that denial.

Appeal of Our Response. In the event you believe we have erroneously denied your request, in full or in part, you may, within 60 days of receipt of that denial, submit an appeal by calling us at (914) 380-8228 or emailing us at wstanley@cornellpace.com. In your appeal submission, please explain why you believe our decision to deny your request was incorrect and please provide any additional information you believe we should consider in connection with your appeal. Within 60 days of receipt of your appeal, we will advise you in writing of any action we have taken, or refrained from taking, in response to your appeal, along with an explanation of why we have taken, or refrained from taking, such action.

14. NEVADA RESIDENTS

Under Nevada law, Nevada residents may opt out of the sale of certain “covered information” collected by operators of websites or online services. We currently do not sell covered information, as “sale” is defined by such law, and do not have plans to do so. In accordance with Nevada law, you may submit to us a verified request instructing us not to sell your covered information. Such requests can be submitted in accordance with the instructions provided in the Contact Us section of this Policy.

15. CONTACT US

If you have questions or comments about this Privacy Policy or Site, you may contact us at:

Cornell Pace Inc.
542 Main Street, 2nd Floor
New Rochelle, NY 10801
wstanley@cornellpace.com
(914) 380-8228