

## **Privacy Notice to California-based Job Applicants, Employees, and Independent Contractors**

### **Pursuant to the California Privacy Rights Act of 2020**

#### **Effective January 1, 2023**

JAKKS Pacific, Inc. (“JAKKS”, “we”, “our”, or “us”) provides this Privacy Notice for Employees, Job Applicants, and Independent Contractors (“Notice”) pursuant to the California Privacy Rights Act. This Notice supplements the information contained in our general Privacy Policy (available at <https://jakks.com/privacy.php>, as updated from time to time, and which is incorporated herein by reference).

This Notice applies only to employees, independent contractors, and applicants for those roles who reside in California (collectively, “you” or “your”). For all other California residents, the California privacy notice section of our Privacy Policy applies. Any terms used in this Notice (whether or not capitalized) which are defined in the California Consumer Privacy Act of 2018 and its successor, the California Privacy Rights Act of 2020 (“CCPA/CPRA”) have the same meaning as in such definitions.

We want you to understand our collection, use, disclosure, and retention of your “Personal Information,” which means any 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. You should also review all other agreements or terms that may apply to your relationship with us.

We are committed to protecting your privacy, and we use administrative, technical, and physical safeguards designed to protect your Personal Information from unauthorized access, disclosure, alteration, or loss.

#### **Personal Information We Collect and Purposes for Use**

In the previous 12 months, we have collected, used, and/or retained, as noted in Table 1 below, the following categories of Personal Information to administer your and our relationship, comply with legal obligations, facilitate communications and efficiency, provide benefits, to ensure the safety of employees, independent contractors, facilities, and property, or for other purposes.

**TABLE 1**

<b>Categories of Personal Information</b>	<b>Examples of Data within Category</b>	<b>Purpose for Collection and Use</b>
Identifiers and person information categories listed in the California Customer Records statute	Name, postal address, internet protocol address, email address, telephone number, social security number, driver’s license or state ID number, passport number	<ul style="list-style-type: none"> <li>• Administer employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Facilitate communications and efficiency</li> <li>• Provide benefits</li> <li>• Ensure safety &amp; protect facilities &amp; property</li> </ul>
Demographic	Birth date, national origin, country of residence	<ul style="list-style-type: none"> <li>• Demographic</li> </ul>
Protected classification characteristics under California or federal law	Age, gender, ethnicity, race, sexual orientation, religious or philosophical beliefs	<ul style="list-style-type: none"> <li>• Administer employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Provide benefits</li> </ul>
Internet or other similar network activity	Browsing history, search history, and information regarding a consumer’s interaction with an internet ad, website, or application	<ul style="list-style-type: none"> <li>• Administer employee/contractor relationship</li> <li>• Facilitate communications and efficiency</li> <li>• Provide benefits</li> </ul>

		<ul style="list-style-type: none"> <li>• Ensure safety &amp; protect facilities &amp; property</li> </ul>
Geolocation data	Geographic location	<ul style="list-style-type: none"> <li>• Facilitate communications and efficiency</li> <li>• Ensure safety &amp; protect facilities &amp; property</li> </ul>
Professional or employment-related information	Information about prior employment	<ul style="list-style-type: none"> <li>• Administer employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Ensure safety &amp; protect facilities &amp; property</li> </ul>
Non-public education information	School records or transcripts	<ul style="list-style-type: none"> <li>• Administer employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Provide benefits</li> <li>• Ensure safety &amp; protect facilities &amp; property</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Marital and dependent status</li> <li>• Beneficiary and emergency contact information</li> <li>• Bank account details and payroll information</li> <li>• Wage and benefit information</li> <li>• Compensation history</li> <li>• Performance information</li> <li>• Insurance enrollment information</li> <li>• Start date</li> <li>• Employment location</li> <li>• Education and training</li> <li>• Employment records (including professional memberships, references, work history, and proof of work eligibility)</li> <li>• Photograph</li> <li>• Credit or debit card numbers</li> <li>• Health information</li> <li>• Other personal details included in a resume or cover letter</li> </ul>	<ul style="list-style-type: none"> <li>• Administer employee/contractor relationship</li> <li>• Comply with legal obligations</li> <li>• Provide benefits</li> <li>• Ensure safety &amp; protect facilities &amp; property</li> <li>• Confirm identity</li> </ul>

The specific pieces of information that we may have collected about any specific individual may differ due to the nature of the individual’s position, role, and benefits. We may have your Personal Information collected by our service providers, including recruiting firms, application processors, background check service providers, and the like.

### **Purpose for Collection of Personal Information**

The purposes for our collection of Personal Information are described in Table 1 are as follows:

#### **A. Administer the Employee/Contractor Relationship**

We need to keep and process Personal Information for normal employment and independent contractor engagement purposes, including identifiers, personal information, and protected classifications. The Personal Information we hold and process will be used for management and administrative uses and only shared with others who have a need to know such information. We will keep and use it to enable us to run our business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, while you are working for us, and after your employment or contractor engagement has ended. This includes using Personal Information to enable us to comply with any legal requirements associated with an employee or independent contractor relationship, to administer payroll or payment, to provide and manage employee benefits, to provide training, to recruit others, to ensure your and others’ health and

safety, to comply with an employment or service contract, to demonstrate our commitment to equal employment opportunity and fair employment practices, and to otherwise enable you to perform your professional obligations and responsibilities at our company.

#### B. Compliance with Legal Obligations

In certain situations, we may need to collect and process your Personal Information to comply with our legal obligations, which include:

- Tracking demographic information to confirm compliance with equal opportunity and non-discrimination policies and requirements;
- Processing information relating to your health in order to comply with our obligations under applicable employment and safety and health laws;
- Verification of employment;
- Tax obligations;
- Unemployment or disability insurance coverage; and/or,
- Producing information relevant to any alleged violation of law or in compliance with a subpoena or other valid legal or regulatory request.

#### C. Facilitate Communications

We use various tools and platforms that enable you and us to communicate with other employees and personnel and to access and share work product and other work-related materials more efficiently.

#### D. Provide Benefits

We collect Personal Information, such as identifiers, protected classifications, and employment information, as is necessary for benefits administration. When you participate in certain benefits programs (as may be applicable to you), we may also generate a log of your activity, track internet and other network activity, and develop a user profile to provide those programs to you in a manner tailored to your preferences.

All benefits may not be available to all personnel, and we will only collect Personal Information to provide a benefit if you are eligible for and enrolled in that benefit. Employees should carefully read the specific terms applicable to any benefits program to understand the specific pieces of information collected.

#### E. Ensure Safety

We collect various categories of Personal Information to ensure the health and safety of our employees, contractors, facilities, and property. Some information, such as identifiers, personal information, protected classifications, and possibly photographs, under limited circumstances help verify your identity in specific facilities, as well as help screen for indicators of infectious diseases or vaccination status of those entering facilities. Other categories of information, such as geolocation data, may assist us with ensuring the security of people, facilities, and property.

### **Sharing and Sale of Personal Information**

We may share your Personal Information with our service providers in order to fulfill a purpose for collecting or using that Personal Information. We have not sold and will not sell your Personal Information for monetary or other valuable consideration, but, our use and disclosure to third

parties (such as data analytics providers) within the past twelve months of cookies, other website tracking technologies identifiers (e.g., IP addresses), and Internet or other similar network activity, may be deemed a “sale” of Personal Information under the CCPA/CPRA, and therefore, such disclosure may constitute a sale of Personal Information under that statute’s definition.

### **Retention of Personal Information**

Any Personal Information collected by us or our service providers will be retained (i) while considering a candidate for an employment or contractor relationship; (ii) during the period of person’s active employment/engagement; and, (iii) during the post-employment/engagement period as long as retention is reasonably necessary and proportionate to achieve the purposes for which it was collected and not otherwise incompatible with such purposes.

### **Sensitive Personal Information**

We also have collected, used and/or retained the following categories of Personal Information that are deemed “sensitive” under the CPRA as set forth in Table2 below:

**TABLE 2**

<b>Category</b>	<b>Examples of Personal Info in the Category</b>	<b>Purpose for Use</b>	<b>Retention Period</b>
Identifiers	<ul style="list-style-type: none"> <li>• Social security number</li> <li>• Driver’s license or state ID number</li> <li>• Passport number</li> </ul>	The purpose of use for all of the Personal Information noted is set forth in Table 1.	Information may be retained for up to 7 years after termination of employment or other working relationship with JAKKS.
Characteristics of protected classifications under California or federal law	<ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> </ul>		
	<ul style="list-style-type: none"> <li>• Sexual orientation</li> </ul>		
	<ul style="list-style-type: none"> <li>• Religious or philosophical beliefs</li> </ul>		
Biometric information	<ul style="list-style-type: none"> <li>• Photograph</li> </ul>		
Geolocation	<ul style="list-style-type: none"> <li>• Precise geolocation</li> </ul>		
Financial/health	<ul style="list-style-type: none"> <li>• bank account and payroll-related numbers</li> </ul>		
	<ul style="list-style-type: none"> <li>• credit or debit card numbers</li> </ul>		
	<ul style="list-style-type: none"> <li>• health information</li> </ul>		

### **Updates to the Notice**

This Notice is subject to periodic revision and updated versions are effective when posted. The current version of this Notice will also be posted at [www.JAKKS.com/CaliforniaPrivacyNotice](http://www.JAKKS.com/CaliforniaPrivacyNotice) for employment applicants, employees, and independent contractors.

We may be subject to certain laws and regulations relating to privacy and information security in more than one jurisdiction. If any term, covenant, condition, or provision of this Notice is held by a court of competent jurisdiction to be invalid, void, or unenforceable, it is the intent of this Notice that the scope of the rights and obligations of the Notice be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable and the remainder of the provisions of the Notice will in no way be affected, impaired, or invalidated as a result.

### **Contact Us**

If you have questions regarding this Notice, please contact [hr@jakks.net](mailto:hr@jakks.net) or 424.268.9409.