

Privacy Policy for California Employees, Job Applicants, and Independent Contractors

Effective Date: January 1, 2023

This policy sets out the privacy practices of Tutor.com, Inc. and its subsidiaries, including TPR Education, LLC d/b/a The Princeton Review (collectively, “we,” “us” or “our”) with respect to personal information of California consumers who are employed by the Company, engaged by us to provide services as independent contractors, or apply for a job with us in accordance with the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (“California Privacy Law”). Any terms defined in the California Privacy Law have the same meaning when used in this policy.

Categories of Personal Information (Including Sensitive Personal Information) We Collect

We may collect, and in the past 12 months have collected, the following categories of personal information about our applicants, independent contractors, employees, and their family members and any beneficiaries they designate:

- Identifiers (such as name, address, , IP address, and email address)
- Categories of information listed in the California Customer Records statute (such as signature, telephone number, and bank, financial account, and credit card number)
- Characteristics of protected classifications under California or federal law (such gender, country of citizenship, and military or veteran status)
- Biometric information (such as fingerprints)
- Internet or other electronic network activity information (such as interaction with our website and use of our electronic or technology resources)
- Professional or employment-related information (such as employment history, technical skills, and references)
- Audio, electronic, visual, olfactory or similar information (such as recordings of online instruction, recordings of calls with customers, recordings of Zoom or Teams meetings, and photos)
- Non-public education information (such as degrees or certifications earned)
- Sensitive personal information:
 - Social security number, driver’s license number, state identification card, and passport number
 - Account log-in in combination with any required security or access code, password, or credentials allowing access to an account
 - Racial or ethnic origin

For clarity, we do not collect or process personal information for the purpose of inferring characteristics about applicants, employees, or independent contractors.

Sources from which Personal Information (Including Sensitive Personal Information) is Collected

We collect personal information from the categories of sources listed below:

- Applicants who may provide personal information in resumes, applications, cover letters, and otherwise during the application process, employees during their employment, or independent contractors when seeking an engagement with us or during their engagement
- Prior employers and professional references
- Educational institutions
- Publicly available sources (such as social media profiles)
- Other individuals or entities who may refer an applicant or independent contractor to us
- Service providers and other vendors (such as those who provide pre-employment screening and background check services)
- Browsers and tracking technologies

Purposes for which Personal Information (Including Sensitive Personal Information) Will Be Collected or Used

We use the personal information of employees and applicants to manage all aspects of their employment (including making decisions on whether or not to hire an individual) and for our business operations and regulatory purposes. For example, we may use personal information to:

- Recruit, hire and onboard
- Conduct pre-employment screening and background checks
- Administer pay, process travel and expense reimbursements, and manage salaries, sick pay, paid time off, and leaves of absence
- Administer medical and other benefits, including to determine the eligibility of an employee's dependents and beneficiaries
- Provide training and career development
- Assess performance and conduct quality control
- Determine promotions, transfers, and compensation
- Manage disputes, conduct internal investigations, and take disciplinary action
- Process employee work-related claims (such as worker's compensation, insurance claims)
- Market our products and services
- Communicate with employees and applicants by emails or using video or audio interactions
- Ensure the protection and proper use of our assets and resources (such as electronic resources and confidential information)
- Enforce our policies and procedures
- Comply with laws and regulations (such as tax, health and safety, and employment laws) including judicial or administrative orders (such as child support orders, subpoenas, and wage garnishments)
- Verify employment for third parties such as a lending company or a new employer
- Prepare and file reports, draft budgets, and engage in workforce planning
- Maintain our records

- Carry out other purposes that we advise employees and applicants of when we collect their information.

We use the personal information of independent contractors to manage all aspects of their engagement with us and for our business and regulatory purposes. For example, we may use personal information to:

- Conduct background checks
- Administer payments and process travel and expense reimbursements in accordance with their contract with us
- Communicate with independent contractors by emails or using video or audio interactions.
- To comply with our legal and regulatory obligations

Personal Information (Including Sensitive Personal Information) Sold or Shared

We do not sell personal information of employees, independent contractors, or applicants, have not sold personal information of such individuals in the last 12 months, and do not have actual knowledge that we sell the personal information of minors under 16 years of age. We also do not share personal information of employees, independent contractors, or applicants with third parties for the purpose of cross-context behavioral advertising and have not shared such information for that purpose over the last 12 months.

Personal Information (Including Sensitive Personal Information) that is Disclosed for a Business Purpose

We may disclose personal information to a third party for a business purpose. In the past 12 months, we have disclosed the categories of personal information listed below:

- Identifiers
- Categories of information listed in the California Customer Records Statute
- Characteristics of protected classifications under California or federal law
- Biometric information
- Internet or other electronic network activity information
- Professional or employment-related information
- Audio, electronic, visual, olfactory or similar information
- Non-public education information
- Sensitive personal information

We have disclosed the categories of personal information listed above to our service providers and other vendors, such as payroll processors, background check service providers, learning management systems providers, benefits administrators, and others who assist us in managing our business and human resources-related functions. We have also disclosed these categories of information to governmental authorities, such as federal, state, or local agencies, law enforcement authorities, and other parties as required by law or legal process.

Right to Know

Employees, independent contractors, and applicants have the right to request that we disclose information to them about our collection, use, disclosure, sale, and sharing of their personal information. Once we receive and confirm an individual's verifiable request, then subject to exceptions provided under the California Privacy Law and based on their request, we will disclose to them:

- The categories of personal information we collected about them.
- The categories of sources from which we collected their personal information.
- The business or commercial purpose for collecting their personal information.
- The categories of third parties to whom we disclosed their personal information.
- The specific pieces of personal information we collected about them.
- If we shared their personal information, the categories of personal information that we collected about them and that were shared with each category of recipient.
- If we disclosed their personal information for a business purpose, the categories of personal information that we collected about them and that were disclosed to each category of recipient.

The Right to Deletion

Individuals have the right to request that we delete the personal information that we have collected from them, subject to exceptions provided under the California Privacy Law. Once we receive and confirm a consumer's verifiable request, then unless an exception applies, we will delete the personal information we have collected from them from our records and direct our service providers and other vendors to delete their personal information from their records.

The Right to Correct Inaccurate Personal Information

If we maintain inaccurate personal information about employees, independent contractors, or applicants, they have the right to request that we correct the inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information. Once we receive and confirm an individual's verifiable consumer request, then unless otherwise provided by the California Privacy Law and subject to our receipt of documentation that we may request, we will correct their personal information in our systems and direct our service providers and other vendors to correct their personal information in their systems.

Submitting Requests

For an employee, independent contractor, or applicant to exercise their right to know, right to deletion, or right to correction described above, they must submit a verifiable consumer request to us by:

- Contacting our Human Resources Department at HR@review.com
- Calling us at 1-800-447-0254; or
- Completing and submitting the web form located at www.princetonreview.com/ccpa and www.tutor.com/ccpa.

An employee, independent contractor, or applicant may only make a verifiable consumer request to know twice within a 12-month period.

An employee, independent contractor or applicant may authorize another person to act as their agent to submit requests on their behalf. Unless they provide the agent with power of attorney under the California Probate Code, they will need to provide the agent a written and signed authorization.

Verification

We will verify the identity of an employee, independent contractor, or applicant before fulfilling their request to know, to delete, or to correct. To accomplish this, we will ask them to provide us data points that we have about them to verify their identity.

If an employee, independent contractor, or applicant authorizes another person to act as their agent to submit requests on their behalf, then unless they provide the agent with power of attorney under the California Probate Code, we will ask the agent to provide us the written and signed authorization that the employee, independent contractor, or applicant provided to the agent, we will confirm with such employee, independent contractor or applicant that they did provide the authorization, and we will verify their identity.

Our Response to Your Request

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we reasonably require more time (up to 45 additional days), we will inform the requestor of the reason in writing within 45 days of receipt of the request. We will deliver our written response by mail or electronically. If we are unable to comply with a request, our response will explain why.

We do not charge a fee to process or respond to a verifiable consumer request unless it is excessive or manifestly unfounded. If we determine that the request warrants a fee, we will tell the requestor why we made that decision and provide the requestor with a cost estimate before completing the request.

Nondiscrimination

Employees, independent contractors, and applicants have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the California Privacy Law.

How Long We Retain Personal Information

We will keep personal information of applicants who have applied for a job and are not hired for 4 years (except if a longer period is required by applicable law), unless they are employed by us or there is a complaint made by them or on their behalf in which case we will retain this information for a longer period. With respect to independent contractors and employees, we will retain their personal information for as long as necessary during the course of their

employment or engagement for legitimate business purposes such as to support our ability to manage and administer an individual's employment or engagement with us. Thereafter, we will keep their personal information to respond any questions, complaints or claims made by such individuals or on their behalf, to meet our record keeping requirements, or to comply with applicable law.

Processing of De-identified Data

We commit to maintaining and using de-identified data without attempting to re-identify the data.

Accessibility of this Privacy Policy

Commercially available screen reader programs should be able to read this policy. As a web page, this policy may be printed as a document.

Contact Us

In case of any questions about this policy or the information we collect, please contact Human Resources by email or mail at the following address:

The Princeton Review and Tutor.com
110 E. 42nd Street, 7th Floor
New York, NY 10017
Attention: Human Resources Department
HR@review.com