

# Apex Fintech Solutions Inc. California Privacy Policy

---

This Apex California Privacy Policy (the “Privacy Policy”) describes the policies and procedures on the collection, use and disclosure of your information relating to your employment (or candidacy for employment) with Apex Fintech Solutions Inc. and its Apex branded affiliate companies (“Apex”), and informs you about your privacy rights under the California Consumer Privacy Act (“CCPA”) as a California employee (or candidate for employment) with Apex.

# Table of Contents

---

## Contents

Table of Contents .....	2
Scope, Interpretation and Definitions .....	3
Scope .....	3
Interpretation .....	3
Definitions .....	3
Your Rights Under the CCPA.....	5
Right to Know.....	5
Right to Correct .....	5
Right to Delete .....	5
Right to Opt-out of Sale or Share .....	5
Right to Limit Use and Disclosure of Sensitive Personal Information .....	5
Right to Non-Discrimination .....	6
Exercising Your Rights .....	6
Collection and Use of Your Personal .....	6
Categories of Personal Information Collected.....	6
How Your Personal Information is Collected .....	7
Use of Your Personal Information.....	7
Sharing of your Personal Information.....	8
Disclosure of Your Personal Information.....	8
Retention of Your Personal Information .....	9
Transfer of Your Personal Information .....	9
Security of Your Personal Information .....	9
Privacy for Minors .....	10
Links to Other Websites .....	10
Changes to this Privacy Policy .....	10

## Scope, Interpretation and Definitions

### Scope

This Privacy Policy applies solely to natural persons residing in California who are employees of, or candidates for employment with, Apex (collectively, "Employees/Candidates"), and does not apply to businesses, other corporate entities, or individuals, employees or candidates living elsewhere.

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for you to access our Systems or parts of our Systems.
- **Company (also referred to "We", "Us" or "Our" in this Privacy Policy)** refers to Apex Fintech Solutions Inc. (and its Apex branded affiliates), principally located at 350 N. St. Paul St., Suite 1300, Dallas, TX 75201.
- **Contractor** means a party to whom the Company makes available an employee/candidate's Personal Information for a business purpose related to your Employment (or prospective employment, in the case of candidates), pursuant to a written contract with the Company.
- **Cookies** are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.
- **Device** means any device that can access the Company's systems, such as a computer, a cell phone or a digital tablet.
- **Employee/Candidate** (also referred to as "You" in this Privacy Policy) means an individual who is a California resident and an employee or candidate for employment with the Company.
- **Employment** means your employment, or candidacy for employment, with the Company as a resident of California.
- **Personal Information** is any information that relates to an identified or identifiable individual. Personal information includes, but is not limited to, the following:
  - Name;
  - Alias;
  - Protected characteristics;
  - Biometric information;
  - Geolocation data;

- Postal address;
  - Unique personal identifier;
  - Online identifier;
  - IP address;
  - Audio, electronic, visual, thermal or similar information;
  - Personal email address;
  - Account name;
  - Social Security number;
  - Driver's license number;
  - Passport number;
  - Signature;
  - Physical characteristics or description;
  - Personal telephone number;
  - State identification card number;
  - Insurance policy number;
  - Bank account number, credit card number, debit card number, or any other financial information;
  - Medical information;
  - Health insurance information;
  - Employment history;
  - Education history; and
  - Sensitive Personal Information (defined below).
- **Sensitive Personal Information** is a subset of Personal Information that requires greater security protections and standards of care in handling. It is generally understood as information that if lost, compromised, or disclosed, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. Sensitive Personal Information includes, but is not limited to, the following:
    - Social Security number;
    - driver's license number;
    - passport number;
    - financial account and payment card information;
    - geolocation data;
    - biometric information;
    - Race;
    - Ethnicity;
    - Citizenship or immigration status;
    - Religious or philosophical beliefs;
    - union membership;
    - private personal communications; and
    - sex life or sexual orientation;
  - **Service Provider** means any party who receives, collects, uses Personal Information on behalf of the Company. It usually refers to vendors or individuals hired by the Company to

perform Human Resources-related or Information Technology-related functions related to your Employment.

- **Systems** refers to the Company's proprietary systems, including, but not limited to, the Company's Information Technology (IT) systems, Human Resources Information Systems (HRIS), the Company's external website(s) and Company's intranet site(s).
- **Third Party** means any party who receives, collects, or uses Personal Information from the Company, who is not a Service Provider or Contractor, and whose purpose regarding your Personal Information is not to perform an HR-related function related to your Employment (or prospective employment, in the case of candidates).
- **Website** refers to Apex's website, accessible from [www.apexfintechsolutions.com](http://www.apexfintechsolutions.com).

## Your Rights Under the CCPA

### Right to Know

You have the right to know, free of charge the following information:

- The categories of personal information collected;
- Specific pieces of personal information collected;
- The categories of sources from which we collected personal information;
- The purposes for which we use the personal information;
- The categories of Third Parties with whom we share the personal information; and
- The categories of Personal Information that we sell or disclose to Third Parties.

### Right to Correct

In certain circumstances, you have the right to request correction of any inaccurate Personal Information as maintained by us. Upon verifying the validity of your Right to Correct request, we will use commercially reasonable efforts to correct your Personal Information as directed, considering the nature of the Personal Information and the purposes of maintaining your Personal Information.

### Right to Delete

In certain circumstances, you have the right to request deletion of your Personal Information as collected by us. Upon verifying the validity of your Right to Delete request, we will use commercially reasonable efforts to delete your Personal Information from our records, and instruct any Service Providers, Contractors or Third Parties to delete your Personal Information, if applicable.

### Right to Opt-out of Sale or Share

You have the right to opt out of the sale or sharing of your Personal Information to a Third Party. However, as of the date of this Privacy Policy, the Company does not sell or share Personal Information to Third Parties within the meaning of the CCPA.

### Right to Limit Use and Disclosure of Sensitive Personal Information

You have the right to limit the use and disclosure of Sensitive Personal Information if it was collected to infer characteristics about you as an Employee/Candidate. However, as of the date of this Privacy

Last updated: August 29, 2025

Policy, the Company does not collect Sensitive Personal Information to infer characteristics about Employees/Candidates.

### Right to Non-Discrimination

You have the right to protection from discrimination or retaliation for exercising your rights under the CCPA.

## Exercising Your Rights

In order to exercise any of your rights under the CCPA, you may contact us using either of the following methods:

- By email: [workforceprivacy@apexfintechsolutions.com](mailto:workforceprivacy@apexfintechsolutions.com)
- By toll-free phone number: 1 (866) 840-4743

Please remember to use your Company email account, specify exactly which right(s) you are exercising (e.g., a Right to Correct request), and be as specific as you can about the information and/or assistance you are seeking.

# Collection and Use of Your Personal Information

---

## Categories of Personal Information Collected

The Personal Information we collect during, or in anticipation of, your Employment may include, but is not limited to, the following categories:

- **Personal identifiers:** Name, contact details (including personal phone number and email address), postal address, Social Security Number, signature, account name, and identification numbers (including driver's license, passport number, state identification card number)
- **Sensory information:** audio, visual, thermal, and olfactory
- **Employment relationship information:** job title, employment history, education history, health insurance information, bank account number, credit card number, and debit card number
- **Internet or other electronic activity information:** IP address, call and meeting recordings/transcriptions, information obtained through Information Technology (IT) and communications monitoring
- **Biometric information:** Fingerprints
- **Sensitive information:** medical information, biometric information, social security number, passport number, driver's license number, state identification card number

We may also collect the following:

- Other Personal Information that may be contained in correspondence and documents which you may provide to us; and/or
- Information we obtain from our Information Technology (IT) and communications monitoring.

### How Your Personal Information is Collected

We collect most Personal Information directly from you. However, we may also collect Personal Information from the following sources:

- Publicly accessible sources;
- Directly from a Service Provider for background checks, due diligence providers, or call and meeting recordings/transcriptions;
- Our Website, or through the use of Cookies;
- Our Company Systems, including Information Technology (IT) systems, Human Resources Information Systems (HRIS), the Company's external website(s) and Company's intranet site(s).
- Door entry systems and reception logs; and/or
- CCTV and access control systems.

### Use of Your Personal Information

The Company may use your Personal Information for the following purposes:

- **To perform HR-related functions:** related to your Employment.
- **To manage your Account:** to manage your registration as a user of the Company's Systems. The Personal Information you provide can give you access to different functionalities of the Systems that are available to you as a registered user.
- **To contact you:** To communicate with you by email, telephone calls, SMS, or other equivalent forms of electronic communication related to your Employment.
- **To manage your requests:** To attend and manage your requests to us under this Privacy Policy.
- **For business transfers:** We may use your 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 (or to be transferred).
- **To comply with the law:** We may collect, use and disclose your Personal Information in order to comply with all applicable federal and state laws and regulations.

- **To enhance internal communication:** We may collect call/meeting recordings to facilitate and transcribe our virtual calls and meetings. This may include the use of artificial intelligence (AI)-powered tools to record and transcribe work-related meetings. We use your data in this way to enhance internal communication and collaboration; accurately document discussions, decisions, and action items; and enable transparency and accountability in business processes. We will provide notice when recordings or transcriptions are taking place, and employees will be informed of the specific tools in use as well as options to opt out of such recordings.
- **To enhance our recruitment process:** We have an interest in using artificial intelligence (AI)-powered tools to record and transcribe interviews. We use your data in this way to ensure accurate documentation of candidate responses, support consistent and fair evaluation processes by interviewers, enhance collaboration among hiring team members, and promote transparency and accountability throughout the recruitment process.
  - We will provide notice when recordings or transcriptions are taking place using AI, and applicants will be informed of the specific tools in use as well as options to opt out of such recordings.
  - We use your personal identification information and communication information, including audio and visual data, for this purpose.
  - No hiring decisions are made by AI, nor does Apex use AI-generated outputs as a substantial factor in making any hiring decisions.
- **For other purposes:** We may use your information for other purposes, such as data analysis, identifying usage trends, and to evaluate and improve our Systems, products, services, marketing and your Employment.

## Sharing of your Personal Information

We may share your Personal Information in the following situations:

- **With Service Providers:** We may share your Personal Information with Service Providers to perform HR-related functions related to your Employment.
- **For business transfers:** We may share or transfer your Personal Information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- **With affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to comply with this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **With other users:** If you share Personal Information or otherwise interact with the Company's external website(s) and/or Company's intranet site(s), then such information may be viewed by and shared with all users of said sites.
- **With your consent:** We may disclose your Personal Information for any other purpose with your consent.

## Disclosure of Your Personal Information



We may disclose your Personal Information under the following circumstances:

- **Business Transactions:** If the Company is involved in a merger, acquisition or asset sale, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different privacy policy.
- **Law enforcement:** Under certain circumstances, the Company may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- **Other legal requirements:** The Company may disclose your Personal Information in the good faith belief that such action is necessary to:
  - Comply with a legal obligation;
  - Protect and defend the rights or property of the Company;
  - Prevent or investigate possible wrongdoing in connection with your Employment;
  - Protect the personal safety of employees, users of Company Systems, or the public; and/or
  - Protect against legal liability.

### Retention of Your Personal Information

The Company will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

### Transfer of Your Personal Information

Your information, including Personal Information, is used at the Company's operating offices and in any other places where the parties involved in your employment are located. It means that this information may be transferred to — and maintained on — computers located outside of California where the data protection laws may differ from those in California.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to a Service Provider, Contractor or Third Party unless there are adequate controls in place including the security of your data and other Personal Information.

### Security of Your Personal Information

The security of your Personal Information is important to us, but please remember that no method of transmission over our Systems, the Internet, or any method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

## Privacy for Minors

We do not knowingly collect personally identifiable information from anyone under the age of 13. 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 anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for using your information and your California requires consent from a parent, we may require your parent's consent before we collect and use that information.

## Links to Other Websites

Our Systems may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on the Company's intranet and updating the "Last updated" date in the footer of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on the Company's Systems.

## Contact Us

If you have any questions about this privacy policy or our processing of your personal information, please contact us at the address provided below.

Apex Privacy Office: [workforceprivacy@apexfintechsolutions.com](mailto:workforceprivacy@apexfintechsolutions.com).