



The KinderCare Education™ Family of Brands

New Employee Privacy Notice

Last Updated January 1, 2020

Welcome to KinderCare! As part of your onboarding process, we need to collect certain Personal Information from you. This New Employee Privacy Notice (or “**Notice**”) explains the categories of information we collect during the recruitment process, how we use that information, and how long it will be retained.

This Notice constitutes an agreement between you and KinderCare Education LLC, KinderCare® Learning Centers, CCLC®, Champions®, Knowledge Beginnings®, The Grove School®, Cambridge Schools™, Rainbow Childcare Center, or any other entity over which KinderCare Education LLC has control (collectively, “**KinderCare,**” “**us,**” “**our,**” or “**we**”). At KinderCare, we recognize that privacy is important, and we encourage you to read this Notice carefully to understand how we collect and use your information.

As used in this Notice, “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a KinderCare employee or their household, including but not limited to identifiers; characteristics of protected classifications; biometric information; professional, educational and employment-related information; and internet activity.

By clicking “Accept” and continuing with the onboarding process, you consent to this Notice and the collection and use of information as described below. If you do not agree with the terms of this Notice, you may click “I Decline” below. If you decline the terms of this Notice or if you refuse to provide Personal Information that is necessary for us to administer your employment, we may not be able to process your onboarding.

Personal Information We Collect. KinderCare collects certain Personal Information from our employees to enable us to comply with employment-related obligations under federal, state, and local laws and to support the KinderCare’s internal business processes related to your employment. We collect this Personal Information during the recruitment and employee onboarding processes from the following sources:

Your Job Application and Other Recruitment Documents. We collect the Personal Information you provided with your consent when you filled out our job application form and provided us with additional Personal Information during the recruitment process. This includes:

- Identifiers like your full name, contact information, date of birth, social security number, and characteristics of protected classifications under state or federal law. We use this Personal Information to create employee records, to communicate with you about your employment, for payroll administration and reporting, and to administer benefits programs.
- Employment-related and educational history, including nonpublic education information. We use this information to assist with our internal processes related to employment and hiring decisions and to promote the expertise of our employees to current and potential customers.

KinderCare Forms. We will collect Personal Information from you with your consent via our employee onboarding forms, as well as other forms, questionnaires and other internal documents from time to time throughout your employment. We will disclose the purpose of collecting this Personal Information at the time it is collected. For example, we may collect:

- Protected classification characteristics during the onboarding process, such as veteran's status, disability status, gender, and ethnicity. Answering these questions is optional, and any Personal Information provided in response to these questions is voluntary and provided with your consent. We collect this Personal Information, as applicable, to meet our employment law reporting obligations.
- Protected classification characteristics like medical information. If we collect this information, we will use it to assist in administering our leave of absences, workers' compensation, fitness for duty, and reasonable accommodation programs and policies.

Your Online Activity. We reserve the right to collect internet or other electronic network activity information and geolocation data from KinderCare devices and networks and from KinderCare-owned vehicles to assist in the enforcement of KinderCare policies, such as our policies related to use of KinderCare property and technology. We collect this information to achieve our legitimate interests of maintaining the safety of children in our care and ensuring that KinderCare property is only used in safe and legally permitted ways.

Third Parties. We may collect Personal Information about you from certain third parties throughout your employment. This Personal Information may include Personal Information that you may choose to include in publicly accessible sources (e.g., LinkedIn) where you have a profile or that are included in publicly available records. We collect this information to achieve the legitimate interest of keeping our employee records up to date. We may use this Personal Information for various internal business purposes.

How We Use Your Personal Information. Once collected, we enter your Personal Information into our human resources software to create and maintain your employment record. We will process the Personal Information as needed for payroll administration and reporting purposes, to administer benefits programs, and to meet our legal obligations under applicable employment laws and state licensing regulations. We reserve the right to use your Personal Information in a deidentified form or in the aggregate to generate internal reports about our recruitment processes. We do this to achieve our legitimate interests of streamlining our recruitment process and improving our ability to attract and retain top talent to join KinderCare.

Children's Privacy. KinderCare recognizes the need to provide further privacy protections with respect to Personal Information of children. We do not knowingly collect any Personal Information from children under 13 without obtaining prior consent from the child's parent or guardian. If you are under 13, do not use KinderCare's website, this employment portal, or provide KinderCare with any Personal Information such as your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at Recruiting@kc-education.com or toll free at 1-888-525-2472.

Retention. We will retain your Personal Information in our application tracking and human resources software for the duration of your employment with KinderCare and, if your employment is terminated for any reason, for a period of five years after your final date of employment. We

retain your Personal Information to maintain a record of our employment practices in the event of a legal or regulatory inquiry. We reserve the right to retain your Personal Information for longer periods as necessary to comply with a litigation hold. At the end of the retention period, we will securely destroy your Personal Information in accordance with our Company Records Retention and Storage Policy.

Sharing Your Personal Information. We may share your Personal Information with vendors that provide us with various services (“**Service Providers**”) as needed for the Service Providers to perform their contractual obligations to KinderCare. For example, we may share your Personal Information with a Service Provider for the purpose of processing your payroll or employee benefits, obtaining employee relocation assistance on your behalf, or securely hosting our employee data. All of our Service Providers are required to take appropriate security measures to protect your Personal Information in line with our policies. We do not allow our Service Providers to sell or disclose your Personal Information or use your Personal Information for their own purposes. We only permit them to process your Personal Information for specified purposes and in accordance with our instructions. KinderCare does not sell employee Personal Information.

Data Security. KinderCare employs commercially appropriate and reasonable physical, electronic, and procedural safeguards, both online and offline, to maintain the security, confidentiality, and integrity of information that we collect about you. We have put in place procedures to respond to suspected security incidents. We will notify you and any applicable regulator of a suspected security incident where we are legally required to do so. Details of these measures may be obtained from our website Privacy Notice.

Contact. Please direct any questions you might have regarding this Notice to Recruiting@kc-education.com or toll free at 1-888-525-2472.