

Privacy Notice and Policy for California Residents: Penumbra, Inc. Job Applicants

Last updated: March 10, 2020

This Privacy Notice and Policy for California Residents (hereinafter referred to as the “Policy”) applies solely to those who reside in the State of California (“you” and “your”). Penumbra adopts this Policy to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

Penumbra, Inc. (“Penumbra”) collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person or household (Personal Information). Penumbra does not sell any of your Personal Information.

This website is operated by Lever, a third-party software services company that manages Penumbra’s job recruiting, application and hiring processes.

Section 1. Information We Collect

Penumbra will collect, receive, and maintain the Personal Information you enter or upload on this website which may include the following categories of Personal Information:

A. Identifiers. Name, alias, postal or mailing address, email address, telephone number, identification number(s) (like a professional license number), physical characteristics or description, education, employment, employment history, or other similar identifiers.

B. Customer records (Cal. Civ. Code §1798.80(e)). A name, signature, address, telephone number, state identification card number (like a professional license number), education, employment, or employment history. Some Personal Information included in this category may overlap with other categories.

C. Protected classification characteristics under California or federal law. Information such as race, ethnicity, sex, gender, sexual orientation, pregnancy, gender identity, religion, age, disability, military status, and familial status.

D. Professional or employment related information. Current and past employers and your position(s). For certain roles, information included in a background check may be collected, used and/or retained as well.

E. Internet or other similar network activity. Penumbra does not collect this category of information, but Lever may use cookies or other tracking technologies on their websites. Lever’s privacy policies can be accessed by clicking “Jobs powered by LEVER” on the bottom of this page.

F. Non-public education information (20 U.S.C. § 1232g, 34 C.F.R. Part 99). If voluntarily provided by you, we may collect information such as your grades, transcripts, class lists, student identification codes or student financial information.

G. Geolocation data. Information about your physical location may be collected. For example, you may provide your home address or the location of your employer(s).

H. Sensory data. Your image may be recorded on security cameras while on Penumbra facilities and parking lots. Your photograph may be taken and used for security purposes.

We obtain the categories of Personal Information listed above from the following types of sources:

- Directly from you. For example, from the forms you complete or documents you upload.
- Indirectly from you. For example, if your image is recorded by a Penumbra security camera while you are on one of Penumbra's campuses.
- From other service providers. For example, third parties may help Penumbra perform employee background checks.

Section 2. Use of Personal Information

Penumbra may use or disclose the Personal Information we collect for one or more of the following purposes:

1. To maintain compliance with state and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, personnel files, wage and hour records, payroll records, and tax records).
2. To assess job candidate qualifications which may include background checks.
3. To help maintain the safety, security, and integrity of our company, products, databases and other technology assets.
4. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
5. 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 about you is among the assets transferred.
6. To ensure compliance with Penumbra policies and applicable laws and regulations. This may include information about your physical location and other types of information to support auditing, monitoring and investigations.

Section 3. Sharing Personal Information

We do not sell any of the Personal Information described in Section 1. We may disclose your Personal Information described in Section 1 to a third party for a business purposes described in Section 2.

We may share your Personal Information with the following types of third parties:

- Service providers which provide us with job application management services (like Lever), background check service providers and IT services.

- Service providers that assist us with business operation services such as legal, financial, and auditing services.
- Penumbra’s affiliates, subsidiaries, and partners.
- Other service providers that we believe are necessary or advisable for us to comply with applicable laws and regulations.

Section 4. Your Rights and Choices

This section describes your CCPA rights regarding Personal Information and explains how to exercise those rights.

A. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Please see the Exercising Access, Data Portability, and Deletion Rights section below for instructions to submit such a request.

B. Deletion Request Rights

You have the right to request that we delete your Personal Information that we collected from you and retained, subject to certain exceptions. Please see Exercising Access, Data Portability, and Deletion Rights below for instructions to submit such a request.

C. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, you (or your authorized agent) can submit a verifiable employee request by either:

- Calling us at 1.877.577.4829
- Emailing us at dataprivacy@penumbrainc.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable employee request related to your Personal Information. The verifiable employee request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot 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. Making a verifiable employee request does not require you to create an account with us.

D. Response Timing and Format

We endeavor to respond to a verifiable employee request within forty-five (45) calendar days of its receipt. If we cannot verify the employee within this 45-day time period, we may deny the request. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically.

Any disclosures we provide will only cover the 12-month period preceding the verifiable employee request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information easily.

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

Section 5. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Section 6. Changes to this Privacy Policy

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will post the updated Policy on Lever and update the effective date. You are responsible for periodically reviewing this Policy on Level to check for any changes.

Please email dataprivacy@penumbrainc.com for any CCPA related questions or if you require this Policy to be provided to you in an alternative format.