

Privacy Policy for Job Applicants

Last Updated: 1/1/2023

The GEO Group, Inc. and its subsidiaries and affiliated companies (“Company”) takes your privacy seriously. We want you to know how we collect, use, and disclose, your personal information.

EEO Statement

Company is an equal employment opportunity employer. The Company’s policy is to not unlawfully discriminate against any applicant or employee on the basis of race, color, sex, religion, national origin, age, disability, or any other consideration made unlawful by applicable federal, state, or local laws. The Company also prohibits harassment of applicants and employees based on any protected category, characteristic or status. It is also the Company’s policy to comply with all applicable state, federal and local laws respecting consideration of unemployment status in making hiring decisions. For more information about Company’s EEO policy, [click here](#).

Company complies with the ADA, the ADAAA and applicable state law and considers reasonable accommodation measures that may be necessary for qualified applicants/employees to perform the essential functions of the job. Hire may be contingent upon a post-offer medical examination, and to skill and agility tests, as appropriate for the position.

Assistance For the Disabled

Alternative formats of this Notice at Collection and Privacy Policy (“Policy”) are available to individuals with a disability. Please contact HR@geogroup.com for assistance.

This Policy explains:

1. The categories of personal information we collect about you
2. The categories of sources from which we collect your personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. How long we keep your personal information
6. Additional information for applicants who are California residents
7. Changes to this Policy

Scope:

This Policy applies to the personal information of individuals in their role as job applicants to Company (“Applicants”).

“**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 particular Applicant.

1) THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect the following categories of personal information. Not all categories may be collected about every Applicant.

- **Identifiers**, for example: real name, nickname, telephone number, postal address, e-mail address, Social Security number, citizenship, date of birth, height, weight, color of eyes, color of hair, place of birth, scars, tattoos, Driver’s License Number, copy of ID and signature.

- **Professional or Employment-Related Information**, for example: educational institutions attended, degrees and certifications, licenses, work experience and previous employers, and professional memberships and affiliations.
- **Related Contacts**, information on related individuals that work for The GEO Group, Inc. to ensure compliance with the Company's nepotism policy if hired.
- **Non-Public Educational Information**, for example: academic transcripts.
- **Internet Activity Information**, for example: interactions with Company's Internet web site, job application, or job advertisement, and publicly available social media activity.
- **Customer Required Forms**, all personal information submitted by applicants on Optional Form 306, Standard Form 85P and Standard Form 85P-S, when required (applicants may request a copy of the completed form(s)).
- **Sensory or Surveillance Data**, for example: voice-mails and footage from video surveillance cameras.
- **Physical Description, for example:** photograph for a security badge or if submitted as part of application materials or health information, for example, to conduct pre-employment physical examinations.
- **Other Details**, for example: membership in voluntary/charitable/public organizations, for example, as stated on the Applicant's resume.
- **Characteristics of Protected Classifications Under State or Federal Law for Applicants**, collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations, for diversity and inclusion reporting and related purposes.
- **Biometric information**, for example: a fingerprint to conduct criminal history background checks.

2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

We may collect personal information from the following categories of sources. Not all categories apply to every Applicant.

- **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process.
- **Vendors and service providers**, for example, recruiters.
- **Third parties**, for example, job references, affiliated companies, professional employer organizations or staffing agencies.
- **Public internet sources**, for example, social media, job boards, public profiles, and other public online sources
- **Public records**, for example, court records, and credentialing and licensing organizations.
- **Automated technologies** on Company's electronic resources, for example, to track logins and activity on the Company's careers page.
- **Surveillance/recording technologies installed by Company**, for example, video surveillance in common areas of Company facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law
- **Government or administrative agencies**, for example, law enforcement or public health authorities.
- **Acquired company**, if Company acquired your employer, Company might collect personal information from that employer.

Note: This Policy does not cover background screening conducted by third-party background check vendors subject to the federal Fair Credit Reporting Act. Company provides a separate disclosure for such screening.

3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

We may use the personal information we collect for one or more of the following purposes:

A. Generally Applicable Purposes:

Unless stated otherwise in section 3.B, below, we may use Applicants' personal information for the following purposes:

Recruiting, including:

- Evaluating Applicants' qualifications or suitability for employment with Company
- Communicating with Applicants
- Conducting a pre-employment or criminal history background check
- Identification purposes
- Diversity and inclusion purposes
- Arranging and managing Company-sponsored events
- Creating a talent pool for future job openings
- Recordkeeping purposes
- Demonstrating Applicants' agreement to, or acceptance of, documents presented to them, *e.g.*, pre-employment arbitration agreement, acknowledgment of employment application, offer letter
- Evaluating and improving the recruiting process
- Promoting Company as a place to work

Monitoring, Security, and Compliance, including:

- Monitoring use of Company facilities and information systems
- Ensuring compliance with applicable laws and Company policies
- Conducting internal audits and investigations
- Protecting the safety and security of Company's facilities
- Administering Company's whistleblower hotline
- Reporting suspected criminal conduct to law enforcement and cooperate in investigations
- Exercising Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

Conducting Our Business, including:

- Training purposes or quality assurance with respect to Company employees conducting the interviews or otherwise assisting with the recruiting and hiring process
- Traveling and event planning
- Engaging in crisis management
- Managing travel reimbursements

Miscellaneous Other Purposes:

- Managing and operating information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning;
- Managing litigation involving Company, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Company or any of its subsidiaries or affiliates; and
- Protecting the rights, property, or safety of Company, Applicants, HR Individuals, customers or others.

B. Purposes Specific to Certain Categories of Personal Information:

We may use the categories of Applicants' personal information listed in this Section 3.B for the purposes stated below:

Purposes For Using Applicants' Biometric Information:

Company uses biometric technology for security purposes to verify the identity of an individual entering certain Company facilities. If Company determines it is necessary for Applicant to enter these facilities during the application process, Company will collect the Applicant's biometric information and provide a supplemental notice concerning this information collection.

Purposes For Using Applicant Health Information:

- Complying, to the extent necessary, with Company's legal obligations, such as to accommodate disabilities
- Protection of the health and safety of Company's employees and facilities, for example, to take the Applicant's temperature
- Occupational health and safety compliance and record-keeping
- Conducting pre-employment medical examinations
- Responding to an Applicant's medical emergency

Purposes For Using Applicants' Protected Categories of Information:

Company collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, the federal Office of Contracting Compliance Programs (applicable to government contractors), and state laws, and for purposes of diversity analytics.

Company also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and state law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

Company collects protected categories of Personal Information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

Company generally maintains information related to Applicants as confidential. However, from time to time, Company may have a legitimate business need to disclose Applicants' personal information. In that event, Company discloses your personal information only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by the California Consumer Privacy Act, as amended ("CCPA"), and other applicable laws.

- **Your direction:** Company may disclose your personal information to third parties at your direction.
- **Service providers and contractors:** Company may disclose your personal information to service providers and contractors for the purposes above to assist us in our recruiting efforts and in meeting our business needs and legal obligations.
 - Company only discloses your personal information to service providers and contractors subject to written contracts as required by applicable law.
 - Service providers and contractors include recruiters, law firms, travel agencies, and any other entity providing services to Company.
- **Affiliated companies:** Other companies within The GEO Group, Inc. family of companies. **Customers:** Company may disclose your personal information for purposes of conducting business, and in order to obtain customer approval for you to work on customer contract.

- **Government or administrative agencies:** These may include, for example:
 - Equal Employment Opportunity Commission as required for reporting.
 - California Department of Fair Employment and Housing as required to respond to employment claims and charges.
 - Law enforcement in the event of criminal investigations.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Company, our users, or others.

5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

If the Company hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. Company will retain this application information for the entire duration of your employment relationship with Company and for as long thereafter as permitted or required by applicable law. Company makes its document retention schedule available to employees for review.

Company will retain information of applicants who are not hired for six (6) years after the record is collected. These records will be retained for our internal recordkeeping and reporting purposes. During that time, we may use your information to consider you for positions in addition to the position(s) for which you initially applied.

6) ADDITIONAL INFORMATION FOR APPLICANTS WHO ARE CALIFORNIA RESIDENTS

California Notice at Collection: Company collects the personal information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 5. We do not sell your personal information or disclose it for cross-context behavioral advertising (“sharing”). We also do not collect or process sensitive personal information for the purpose inferring characteristics about you.

a. Additional Information Regarding Disclosures of Personal Information

The CCPA requires that we provide you with the following information about sales and “sharing” and disclosures of your personal information to third parties for “business purposes”, as those terms are defined in the CCPA:

- **Service providers:** Company may disclose to service providers any of the categories of personal information listed in Section 1, above, for the business purpose of performing services on Company’s behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by Company:** Company may disclose the categories of personal information listed in Section 1, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on the Company’s behalf.
- **Affiliated companies:** Company may disclose any of the categories of personal information listed in Section 1, above, to other companies within the **[insert name of family of companies]** family of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) short-term transient use, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

No sales and no “sharing”, i.e., disclosure for cross-context behavioral advertising:

Company does not sell the personal information of any Applicants nor share their personal information for cross-context behavioral advertising. In addition, we have no actual knowledge that we sell or share the personal information of individuals of any age in connection with the HR relationship, including the personal information of children under 16.

b. Your California Privacy Rights

Subject to applicable law, Applicants have the following rights:

- **Right to Know:** You have the right to submit a verifiable request up to twice in a 12-month period for copies of specific pieces of your personal information obtained from you and for information about the Company’s collection, use, and disclosure of your personal information.
 - Please note that the right to obtain copies does not grant a right to the whole of any document that contains personal information, but only to copies of “specific pieces” of personal information. Moreover, Applicants have a right to know categories of sources of personal information and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients.
- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to Company.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by Company, taking into account the nature of the personal information and the purposes of processing the personal information.

Note on Inferring Characteristics: Company does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about the Applicant.

Deidentified Information

At times, Company converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual (“Deidentified Information”). Company maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that Company may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual. Company prohibits vendors, by contract, from attempting to reidentify Company’s Deidentified Information.

c. How to Exercise Your Rights

Company will respond to requests know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call 1-800-592-6832
- Email HR@geogroup.com or complete request form available at https://www.geogroup.com/Portals/0/GEO_Group_CPRA_Request_Form.pdf and submit to HR@geogroup.com.

d. How We Will Verify Your Request:

We match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient

level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

e. Authorized Agents

If an authorized agent submits a request to know, correct, or delete on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity.

f. Company's Non-Discrimination and Non-Retaliation Policy

Company will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the CCPA.

7) CHANGES TO THIS PRIVACY POLICY

If we change this Policy, we will post those changes on this page and update the Policy modification date above. If we materially change this Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

For More Information

For questions or concerns about Company's privacy policies and practices, please contact us at HR@geogroup.com.