



# Privacy Notice & Data Protection Policy

## Coppersmith Recruitment and Services Inc.

Effective Date: 1st January 2026

### Introduction

Coppersmith Recruitment and Services Inc. ("Coppersmith," "we," "us," or "our") is committed to protecting the privacy and personal information of candidates, clients, and business contacts. This Privacy Notice explains how we collect, use, store, and protect personal data in connection with our recruitment and staffing services in the United States. This policy aligns with applicable U.S. federal and state privacy laws, including the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA).

### Information We Collect

We may collect personal information including contact details, employment history, skills, qualifications, availability, shift preferences, identification and right-to-work information where legally required, and communications with us. We only collect information necessary for recruitment, placement, onboarding, payroll, compliance, and business operations.

### How We Use Personal Information

Personal information is used to match candidates with job opportunities, communicate with candidates and clients, manage recruitment and onboarding processes, comply with legal obligations, and operate our recruitment services. We do not sell personal data.

### Data Storage & Systems

We use Rocket Recruitment, a professional recruitment software platform, to securely store and manage candidate and client information. Access is controlled and limited to authorized personnel. Where required, information may be shared with trusted third-party partners



such as payroll providers or Employers of Record strictly for employment administration and compliance.

## **Data Security Measures**

We implement reasonable and appropriate safeguards including secure systems, restricted access, reputable technology providers, and regular reviews of data handling practices. While no system can guarantee absolute security, we follow accepted industry standards.

## **Data Sharing**

Personal information may be shared with clients for candidate evaluation, payroll or onboarding partners, background screening providers where authorized, and regulatory authorities when legally required. Data sharing is limited to what is necessary.

## **Data Retention**

We retain personal information only for as long as necessary to support recruitment activities, comply with legal obligations, and resolve disputes. Data is securely deleted or anonymized when no longer required.

## **Your Rights**

Depending on applicable laws, you may request access to your personal data, correction of inaccurate information, deletion of data subject to legal requirements, or opt out of certain communications.

## **California Privacy Rights (CCPA / CPRA)**

California residents have additional rights including the right to know what personal information is collected, request access, request correction or deletion, limit the use of sensitive personal information, and not be discriminated against for exercising privacy rights. We do not sell or share personal information for cross-context behavioral advertising.

## **Policy Updates**

We may update this Privacy Notice periodically to reflect changes in law or business practices. Updates will be posted with a revised effective date.



## Contact Information

For questions or to exercise your data rights, please contact: [Tim.hutton@coppersmith-us.com](mailto:Tim.hutton@coppersmith-us.com)