

## Privacy Policy and Notice

This policy describes how Management & Training Corporation, and its operating subsidiaries (collectively “MTC”) collects, uses, and shares your information. When you use our sites, products, or services or otherwise form a relationship with us, we may obtain data from you and the devices you use to interact with us.

This policy is designed to provide transparency into our privacy practices and principles in a format you can navigate, read, and understand.

We commit to treat your personal information with care and respect and give you methods to contact us should you have any questions or concerns about the use of your information.

Finally, you may have received additional privacy documentation from us when you used a specific site, product, or service from us. In that case, the documentation you received should be read in conjunction with this Notice.

This policy explains:

### The Scope of this Policy

This Policy describes the processing of information provided or collected on our sites and applications where this privacy policy is posted. In some instances, we may provide additional data privacy notices specific to certain products, practices, or regions. Those terms should be read in conjunction with this policy.

If you provide information to us on a third-party site or platform, the information you provide may be separately collected by the third-party site or platform. That third-party site or platform’s privacy practices will govern the use of your information. Choices you make on that third-party platform will not apply to our use of the information we have collected through our sites, products, or services.

### Your Privacy Rights

If you are a resident of certain states or countries, you may have the right to know, access, correct, transfer, restrict the processing of, opt-out from certain types of processing (e.g., targeted advertising, the sale of personal data, limit the use and disclosure of sensitive information, and profiling, as defined by the applicable state law(s)), and delete your personal information. If you choose to exercise any of these options, we will not discriminate against you for making that decision.

You can exercise your privacy rights by clicking the “Your Privacy Choices” link at the bottom of our website and selecting the applicable request, or by contacting us at [MTC.Privacy.Corporate@mtctrains.com](mailto:MTC.Privacy.Corporate@mtctrains.com). When we receive a request to exercise a privacy right, we will review information we have collected about you (if any) with identifying information you may have provided us (such as a login, email address, mailing address, zip code, or transaction or order number) to authenticate your identity. If you use an authorized agent to submit a request, we may require the authorized agent to provide proof that you gave the agent signed permission to submit the request. We may also require you to directly confirm with us that you provided the authorized agent permission to submit the request.

There may be situations where we cannot grant your request. In such a situation, we will explain our reasoning to you and will honor your right to appeal when applicable.

## Information Collected or Processed

In the preceding 12 months, MTC may have collected or processed the categories of personal information that are identified below. We generally collect the information listed below to secure, improve, and provide our services to our customers.

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.
- Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

## Sources of Information

The sources from which personal information may have been collected or processed are the following: information that you provided to us, online tracking technologies, automatic data collection technologies, social media platforms and networks, business partners, etc. The purpose of such collection or processing include: providing our products and services, communicating with you, administering programs, marketing and promotional purposes (which may include targeted advertising), analytics and personalization, security and fraud prevention, legal obligations, core business functions, the job applicant process, etc.

## How We Disclose Information

MTC does not believe it has "sold" (for monetary or other valuable consideration) or "shared" (for cross-context behavioral advertising purposes) your personal information in the last 12 months, as defined by certain state laws. However, we may disclose your information to our subsidiaries and affiliates, along with our service providers and third-party processors to provide services to you. We may also disclose your information with service providers and third parties when necessary to comply with laws and regulations; respond to subpoenas and court orders; exercise our legal rights or defend against legal claims; investigate, prevent, or take action regarding illegal activities, suspected fraud, potential threats to our property or the physical safety of any person, or violations of our usage instructions and applicable terms and conditions; facilitate the financing or insuring of our business or a disposition of all or part of our business or assets, or as otherwise permitted or required by law. We may disclose anonymized or aggregated data at our discretion, in accordance with applicable laws.

If you post your information or content to our online forums or media sites, this information is public on the Internet. We are unable to prevent or control further use of this information and refer you to the third-party sites' privacy policies and terms of use to learn more about their privacy practices.

## Your Controls and Choices

You can control how and when you want to receive marketing emails from MTC by clicking on the “unsubscribe” link located at the bottom of our email communications to you. This will not affect your receipt of administrative emails (for example, emails about your account, transactions, or policy changes) for your registered account.

## Our Commitment to Protecting Information Belonging to Children

Our services are not intended for children under the age of 16. We do not knowingly collect information via our sites, products, and services from users under the age of 16. If you use our Services, you represent that you are at least the age of majority under the laws of the jurisdiction of your place of residence. If you believe your child has provided us with personal information, please alert us at [MTC.Privacy.Corporate@mtctrains.com](mailto:MTC.Privacy.Corporate@mtctrains.com). If we learn that we have collected personal information from a minor, we will promptly take steps to delete such information and terminate the minor’s account.

## Cookies and Other Technologies

Cookies are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features. We recommend you keep cookies activated. We have broken up our cookies into categories to help you understand what they do.

- **Essential:** These cookies are required to use our services. For example, they are necessary to access our website and login to your account.
- **Performance:** These cookies track how you interact with our website. For example, these cookies let us know which pages on our website load slowly or are not optimized for mobile use. We use this information to make improvements to our user experience.
- **Functionality:** These cookies track information about you to make using our website easier. For example, we may retain information such as your login status and viewing preferences.
- **Marketing and Analytics:** These cookies help us create targeted advertising experiences on our websites.

You can manage your cookie preferences on our cookie banner that pops up when you first visit our website.

### **Global Privacy Control**

If you would like to control the use of cookies and similar internet technologies on your computer, you can use web browsers listed with the Global Privacy Control tool built into them. These browsers limit cookie technologies and how they work while you browse the internet. You can find a list of browsers with the Global Privacy Control tool built into it here: <https://globalprivacycontrol.org/#download>.

The use of the website and web browsers located at the site above is at your own risk, subject to the agreements from those web browsers’ developers, and subject to their privacy policies. MTC

does not accept any liability associated with your use of the website above or the content you may download from that website.

## Our Global Data Transfer Practices

We store and process your personal information on our servers located within the United States but may transfer your personal information to other countries outside of the United States for the purposes describe in this Privacy Policy. By using our websites, products, or services, you agree to the global transfer, process, and storage of your personal information.

## Contacting Supervisory Authorities

If you would like to lodge a complaint against us, you may contact your local privacy regulator. If you have trouble locating a privacy regulator, please contact our privacy office at [MTC.Privacy.Corporate@mtctrains.com](mailto:MTC.Privacy.Corporate@mtctrains.com) and they will help you contact the appropriate enforcement agency.

## How to Contact Us

If you have any questions about how we process your information, you can contact us at:

500 N. Marketplace Drive, Suite 100  
Centerville, UT USA 84014  
801.693.2600  
[MTC.Privacy.Corporate@mtctrains.com](mailto:MTC.Privacy.Corporate@mtctrains.com)

This policy was last updated on: December 5, 2023

## Relationship-Specific Details

### Web User

<b>Description</b>	Website Operations
<b>Categories of Information</b>	Identifiers Internet Data
<b>Category of Data Subjects</b>	Web users
<b>The Source from which this Information was Collected</b>	This information is gathered directly from web users.
<b>Purpose of Processing</b>	This information is gathered for responding to inquiries, send newsletter/updates, job recruiting, evaluation of how individuals use the website, and to comply with legal obligations.
<b>Legal Basis for Processing</b>	There is a legitimate business interest in handling the information.

<b>Automated Processing or Profiling</b>	<p><b>Does this product/service/process use automated processing:</b>          Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p><b>If yes, the general methods and logic used are:</b> Not applicable.</p> <p><b>Does the automated processing affect the rights of data subjects?</b> Not applicable.</p>
--	---

	Categories of Recipients	Description of Commercial or Business Purpose	Is this Information Sold or Shared
<b>Information Sharing</b>	MTC company offices, business support services, IT administration services	MTC may share your personal information between its offices and facilities for business and IT administration, recruiting and operational purposes. MTC may also utilize third parties to help MTC host the website, conduct recruiting, facilitate correspondence with you, and for general business and IT administration purposes. MTC may also share your personal information when necessary to: comply with laws and regulations; respond to subpoenas and court orders; exercise MTC's legal rights or defend against legal claims; investigate, prevent, or take action regarding illegal activities, suspected	<input type="checkbox"/> Sold <input checked="" type="checkbox"/> Shared MTC shares this information with service providers for a business purpose.

		fraud, potential threats to MTC's property or the physical safety of any person; facilitate the financing or insuring of our business or a disposition of all or part of our business or assets, or as otherwise permitted or required by law.	
<b>Sensitive Personal Information</b>	<b>Category of Sensitive Personal Information Collected</b>		<b>Retention Period</b>
		Not applicable	Not applicable
<b>Whether Personal Information is Transferred Internationally</b>	USA		
<b>Retention Period</b>	MTC will retain your personal information for as long as necessary to fulfil the purposes described in this Privacy Policy, unless otherwise required by contract or law.		
<b>Point of Contact</b>	<a href="mailto:MTC.Privacy.Corporate@mtctrains.com">MTC.Privacy.Corporate@mtctrains.com</a>		

**Job Corps Students and Applicants**

<b>Description</b>	Job Corps Students and Applicants
<b>Categories of Information</b>	Identifiers Characteristics of Protected Class Information Biometric Information Geolocation Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information Professional or Employment-Related Information Education Information
<b>Category of Data Subjects</b>	This information is collected in connection to an individual's role as a contractor of the U.S. Department of Labor (DOL) or subcontractor to a contractor of the DOL in relation to participation in the Job Corps program.
<b>The Source from which this Information was Collected</b>	Applicant Applicant's parent, if applicant is a minor. Schools Medical providers Criminal justice system

	Employers Case workers Probation officers Childcare provider MTC generated photographs and videos. Other Job Corps contractors providing Outreach and Admissions services		
<b>Purpose of Processing</b>	This information is gathered to determine Job Corps eligibility and suitability prior to acceptance for admissions into the Job Corps program.		
<b>Legal Basis for Processing</b>	There is a legitimate business interest in handling the information.		
<b>Automated Processing or Profiling</b>	<b>Does this product/service/process use automated processing:</b> Yes <input type="checkbox"/>  No <input checked="" type="checkbox"/>  <b>If yes, the general methods and logic used are:</b>  <b>Does the automated processing affect the rights of data subjects?</b>		
<b>Information Sharing</b>	<b>Categories of Recipients</b>	<b>Description of Commercial or Business Purpose</b>	<b>Is this Information Sold or Shared</b>
	Other Job Corps center operators, if student not assigned to a MTC operated center, third party criminal background check provider(s) selected by DOL, and Job Corps medical providers, if MTC is not providing medical care.  Other Job Corps center operators, where student is screened by MTC	Business Purpose: Required by DOL for determining Job Corps eligibility and suitability prior to acceptance for admissions into the Job Corps program.  Biometric information is collected during the admissions process and in the course of providing health and wellness services in the operation of the	<input type="checkbox"/> Sold <input checked="" type="checkbox"/> Shared  MTC shares this information with service providers for a business purpose.

	Outreach and Admissions but assigned to a non-MTC operated Job Corps center.	Job Corps Centers. MTC may collect body temperature information to ensure a safe and healthy center environment.	
<b>Sensitive Personal Information</b>	<b>Category of Sensitive Personal Information Collected</b>	<b>Retention Period</b>	
	<ul style="list-style-type: none"> <li>• Social security, driver's license, state identification card, or passport number.</li> <li>• Racial or ethnic origin, religious or philosophical beliefs, or union membership.</li> <li>• Personal information collected and analyzed concerning a consumer's health.</li> <li>• Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.</li> </ul> <p>MTC only collects sensitive personal information, as defined in the applicable state privacy laws, with your consent and does not use sensitive personal information for inferring characteristics about you.</p>	Throughout the term of the Job Corps relationship or as needed or allowed by law.	
<b>Whether Personal Information is Transferred Internationally</b>	USA		
<b>Retention Period</b>	Throughout the term of the Job Corps relationship or as needed or allowed by law.		
<b>Point of Contact</b>	<a href="mailto:MTC.Privacy.JobCorps@mtctrains.com">MTC.Privacy.JobCorps@mtctrains.com</a>		

**Employee/Recruit/Prospect/Candidate**

<b>Description</b>	Personal data gathered through the recruitment, employment, or contracting process.
<b>Categories of Information</b>	Identifiers Characteristics of Protected Class Information Internet or Other Electronic Network Activity Biometric Information Geolocation Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information Professional or Employment-Related Information Education Information
<b>Category of Data Subjects</b>	Employees, candidates, prospects, and recruits.



<b>The Source from which this Information was Collected</b>	MTC gathers this data directly from employees, candidate, prospects, and recruits.		
<b>Purpose of Processing</b>	MTC processes this information to evaluate whether to form an employment relationship with prospects.		
<b>Legal Basis for Processing</b>	MTC gathers this information to enter, or for the performance of, a contract.		
<b>Automated Processing or Profiling</b>	<p><b>Does this product/service/process use automated processing:</b>  Yes <input checked="" type="checkbox"/>  No <input type="checkbox"/></p> <p><b>If yes, the general methods and logic used are:</b> Automated processing is used to make sure applications are provided to MTC HR department. MTC does not use automated processing or profiling to make HR decisions such as whether to hire, promote, or take disciplinary action.</p> <p><b>Does the automated processing affect the rights of data subjects?</b> No.</p>		
<b>Information Sharing</b>	<b>Categories of Recipients</b>	<b>Description of Commercial or Business Purpose</b>	<b>Is this Information Sold or Shared</b>
	Cloud infrastructure Employment benefits providers Payroll management and processing entities Office management software IT/Security services Government agencies Public authorities	MTC’s business purpose for providing this information is to support the employment relationship and/or recruitment process, as well as to aid in ensuring a safe and healthy work environment.	<input type="checkbox"/> Sold <input checked="" type="checkbox"/> Shared MTC shares this information with service providers for a business purpose.

<b>Sensitive Personal Information</b>	<b>Category of Sensitive Personal Information Collected</b>	<b>Retention Period</b>	
	<ul style="list-style-type: none"> <li>• Social security, driver's license, state identification card, or passport number.</li> <li>• Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.</li> <li>• Racial or ethnic origin, religious or philosophical beliefs, or union membership.</li> <li>• The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.</li> <li>• The processing of biometric information for the purpose of uniquely identifying a consumer.</li> <li>• Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.</li> </ul> <p>MTC only collects sensitive personal information, as defined in the applicable state privacy laws, with your consent and does not use sensitive personal information for inferring characteristics about you.</p>	Throughout the term of employment or as needed or allowed by law.	
<b>Whether Personal Information is Transferred Internationally</b>	USA		
<b>Retention Period</b>	Throughout the term of employment or as needed or allowed by law.		
<b>Point of Contact</b>	<a href="mailto:MTC.Privacy.HR@mtctrains.com">MTC.Privacy.HR@mtctrains.com</a>		

### Corrections

<b>Description</b>	Corrections
<b>Categories of Information</b>	Identifiers Characteristics of Protected Class Information Internet or Other Electronic Network Activity Biometric Information Geolocation Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information Professional or Employment-Related Information Education Information

<b>Category of Data Subjects</b>	Individuals in their capacity as a private contractor operating detention and correctional facilities as well as related programs.		
<b>The Source from which this Information was Collected</b>	MTC gathers this information below directly from private contractors.		
<b>Purpose of Processing</b>	MTC processes this information to evaluate whether to form a contractor relationship with contractors.		
<b>Legal Basis for Processing</b>	MTC gathers this information to enter, or for the performance of, a contract.		
<b>Automated Processing or Profiling</b>	<p><b>Does this product/service/process use automated processing:</b>  Yes <input checked="" type="checkbox"/>  No <input type="checkbox"/></p> <p><b>If yes, the general methods and logic used are:</b> Automated processing is used to make sure applications are provided to MTC's HR department. MTC does not use automated processing or profiling to make HR decisions such as whether to hire, promote, or take disciplinary action.</p> <p><b>Does the automated processing affect the rights of data subjects?</b> No.</p>		
<b>Information Sharing</b>	<b>Categories of Recipients</b>	<b>Description of Commercial or Business Purpose</b>	<b>Is this Information Sold or Shared</b>
	Client agencies Local, state, and federal law enforcement Inmate Victims Courts Emergency contacts Third party medical providers	MTC's business purpose for providing this information is required by client agencies to ensure a person is lawfully in custody, security is maintained, and appropriate programs and services are provided. MTC may collect information on inmate visitors and volunteers to ensure security and authorized access to inmates and the facility.	<input type="checkbox"/> Sold <input checked="" type="checkbox"/> Shared MTC shares this information with service providers for a business purpose.

	Accrediting bodies		
	Third party community corrections providers		
<b>Sensitive Personal Information</b>	<b>Category of Sensitive Personal Information Collected</b>	<b>Retention Period</b>	
	<ul style="list-style-type: none"> <li>• Social security, driver's license, state identification card, or passport number.</li> <li>• Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account. MTC collects non-banking information associated with commissary accounts.</li> <li>• Precise geolocation for community re-entry center programs.</li> <li>• Racial or ethnic origin, religious or philosophical beliefs, or union membership.</li> <li>• The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.</li> <li>• The processing of biometric information for the purpose of uniquely identifying a consumer.</li> <li>• Personal information collected and analyzed concerning a consumer's health.</li> <li>• Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.</li> </ul> <p>MTC only collects sensitive personal information, as defined in the applicable state privacy laws, with your consent and does not use sensitive personal information for inferring characteristics about you.</p>	Throughout the contractor relationship or as needed or allowed by law.	
<b>Whether Personal Information is Transferred Internationally</b>	USA		
<b>Retention Period</b>	Throughout the contractor relationship or as needed or allowed by law.		
<b>Point of Contact</b>	<a href="mailto:MTC.Privacy.Corrections@mtctrains.com">MTC.Privacy.Corrections@mtctrains.com</a>		