

## Caltech Employees Federal Credit Union

### California Consumer Privacy Act

#### Privacy Notice and Notice at Collection to Job Applicants and Employees

In compliance with the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), collectively, the CCPA, Caltech Employees Federal Credit Union ("CEFCU") is providing you with this Privacy Notice ("Notice") for job applicants and employees to inform you about:

1. The categories and types of Personal Information CEFCU collects about applicants and employees who reside in California; and
2. The purposes for which CEFCU uses your Personal Information.

"Personal Information" is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person that CEFCU collects about its applicants and employees who reside in California, in their capacity as applicants for employment or employees with CEFCU.

This Notice will be made available in an alternative format to individuals with a disability by contacting [humanresourcesdepartment@cefcu.org](mailto:humanresourcesdepartment@cefcu.org) for assistance.

CEFCU is committed to protecting the privacy and security of personal information that we collect. In the course of business, we ask job applicants and employees to provide personal information necessary, relating to your employment or prospective employment. This Notice describes how CEFCU collects and uses your personal information, the categories of personal information it collects, and instances where CEFCU may disclose your personal information to third parties. CEFCU will only collect and process your personal information in accordance with this Notice, unless otherwise required by applicable law.

#### Categories of Personal Information

CEFCU collects and processes information from you for human resources, employment, and benefits administration purposes, and where necessary to comply with any local, state and federal legal obligations. In addition, CEFCU may obtain a background check or consumer report from a consumer reporting agency in the course of our selection process with your prior approval.

Category	Personal Information/Identifiers	Purposes
<b>Identifiers and Professional or Employment-Related Information</b>	Real name, nickname, alias, address, telephone number, email address, signature, unique personal identifier, photo, date of birth, social security number, driver license number, passport number, government issued ID number, immigration and work status, education, employment, signature	CEFCU collects this information to make an employment and/or job-related decision that involves you, to fulfill or meet the reason you provided the information, to provide you with employment, to manage your employment relationship, and for general employee administration and processing

<b>Financial Information</b>	Banking information, bank account number, debit card number, credit card number, or any other financial information, tax selections, pay rate, and payroll deduction information	CEFCU collects this information for employee related human resources administration, including payroll and benefits administration, benefit claims and processing expense reimbursements
<b>Medical and Health Data</b>	Insurance policy number, medical information, benefit selections, dependent name, dependent social security number and date of birth, medical work restrictions or limitations, vaccination status, COVID test results, temperature, COVID-related symptoms, COVID-related information of household members or close contacts, workplace accident and illness information	CEFCU collects this information to administer benefit claims, claims for workers' compensation, disability claims, return to work, work restrictions, work from home and other employee-related administration that relies on medical and health data
<b>Protected Classification and Diversity Information</b>	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression), pregnancy or childbirth and related medical conditions), sexual orientation, and veteran or military status	CEFCU collects this information to comply with local, state, and federal laws and regulations, and for CEFCU's diversity initiatives, and compliance with the Equal Employment Opportunity Commission and the California Civil Rights Department
<b>Professional and Employment Related Information</b>	Current or past employment history, employment status, job title, work schedule, hours worked, job assignments, training and development, work performance, disciplinary information, termination information, prior employers, personal references, educational records such as grades and transcripts	CEFCU collects this information to make employment and job-related decisions, to fulfill or meet the reason you provided the information as a job applicant or employee, to assess qualifications, and to gather performance information for decisions related to employment or continued employment
<b>Beneficiary Information</b>	Name and contact information, relationship to you, birth date, social security number and any other information necessary to process claims	CEFCU collects this information to administer and process any benefit programs that are payable upon the death of the employee

<b>Sensory or Surveillance Data</b>	Footage and visual information collected from video surveillance cameras, audio and voice recordings, fingerprints, physical access to our office or branch locations	CEFCU collects this information to protect the safety and security of its facilities and personnel
<b>Internet or Similar Network Activity</b>	Search history, browsing history, login information and IP addresses on our information systems and networks, time and physical location related to use of an internet website, application or device	CEFCU collects this information to maintain the safety, security and integrity of the credit union's information systems, and to guard against vulnerabilities
<b>Emergency Contact Information</b>	Name of person you identify as your emergency contact, phone numbers, and relationship to you	CEFCU collects this information to maintain contact information should an emergency involving you arise during your employment

Personal information for purposes of the CCPA does not include:

- Publicly available information
- De-identified or aggregated consumer information
- Information excluded from the CCPA's scope, like personal information covered by certain financial sector laws, such as the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), or California Financial Information Privacy Act (FIPA)

### **Selling or Sharing Personal Information**

CEFCU does not infer characteristics, or sell, or otherwise disclose your personal information to any third parties for any monetary consideration. CEFCU only shares your personal information with service providers to the extent necessary in order to administer employee benefits, including for payment of wages, tax processing, and health insurance or other benefit programs, and in connection with its human resource activities. CEFCU also discloses your information when required by local, state or federal law.

Cross-context behavioral advertising refers to the targeting of advertising to a consumer based on the consumer's personal information obtained from the consumer's activity across businesses, distinctly branded websites, applications, or services, other than the business, distinctly branded website, application or service with which the consumer intentionally interacts.

We will not share your personal information for cross-context behavioral advertising purposes.

### **Retention of Personal Information**

The criteria we will use to determine the period of time that we will retain the categories of personal information described above depends on our relationship with you and on the following criteria:

- **Laws and regulations:** We are a regulated financial institution that is subject to laws and regulations governing our retention of personal information of our members, applicants for credit union membership, loans and other financial products and services. We are also an employer and, thus, we are subject to labor laws governing how long we must retain information about applicants for employment and current and former employees. Therefore, applicable laws and regulations will govern how long we retain your personal information.
- **Contracts:** We must also retain information for as long as necessary to comply with our contractual duty to you, as well as our contractual obligations with our service providers, contractors and other third parties.
- **Assert and defend against legal actions:** We may retain your personal information for such period as we may need, to assert and defend against potential legal actions.

#### **Changes to this Notice**

CEFCU reserves the right to update this Privacy Notice at any time. As required by the CCPA, CEFCU will review and revise this Notice on an annual basis as necessary. Updates to this Notice will be posted and made available at the time of collection.

#### **Contact Information**

If you have any questions or comments about this Notice, please contact us at 800-592-3328 or PO Box 11001, La Canada Flintridge, CA 91012.