



CCPA PRIVACY NOTICE TO CALIFORNIA EMPLOYEES AND JOB APPLICANTS

Rev. 1/2023

FFCU hereby adopts this Privacy Notice and Notice at Collection to California Employees and Job Applicants (“Privacy Notice”) pursuant to the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”). Any terms defined in the CCPA and CPRA shall have the same meaning when used in this Privacy Notice.

FFCU is committed to protecting the privacy and security of personal information and sensitive personal information that it acquires from employees and job applicants. FFCU will only collect and process your personal information in accordance with this Privacy Notice (which may be modified from time-to-time), unless otherwise required by applicable law.

Personal Information FFCU Collects and How FFCU Uses the Personal Information

FFCU obtains categories of personal information and sensitive personal information from the following categories of sources: directly from you (for example, from forms you complete or information you provide); indirectly from you (for example, from observing your actions on our website or from information your computer or mobile device transmits when interacting with our website); and from third parties (for example, staffing and recruiting agencies and consumer reporting agencies when we perform employee background screenings). More specifically, FFCU may collect the following categories of personal information and sensitive personal information (none of which FFCU uses to infer characteristics) about job applicants or employees:

- Personal identifiers such as your first and last name, address, email address, telephone number, date of birth, social security number, driver’s license number, passport number, and/or other government identification numbers, immigration and work authorization status, signature, and username and/or account name. FFCU collects this information to make employment and/or job-related decisions that involve you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment with FFCU, to manage your employment relationship with FFCU and for general employee administration and processing, and to create, maintain, and secure your online employee accounts with FFCU.
- Financial information such as banking information for direct deposit, debit card number, credit card number, tax selections, pay rate, payroll deduction information, legal issues (e.g., child support, alimony, bankruptcies, and wage garnishments), information regarding collections, debts, student loans, and personal and real property. FFCU collects this information for employee-related human resource administration and to evaluate and make employment and/or job-related decisions that involve you and are permitted and/or required under state and federal laws and regulations, processing work-related claims (for example, insurance or payment claims), and all related accounting and auditing.

- Benefit selection and related information such as your benefit selection, social security number or other government identification number, date of birth, health insurance information, policy number, and selections. FFCU collects this information to administer benefit claims and for employee-related human resource administration.
- Protected classification, demographics, and diversity information such as age, race, color, national origin, citizenship, marital status, physical or mental disability, sex (including gender, gender identity, gender expression), and veteran or military status. FFCU collects this information to comply with local, state, and federal laws and regulations and for FFCU's diversity initiatives.
- Professional and employment-related information such as current or past employment history, employee status and title, job evaluations, work schedule, job assignments, hours worked, training and development information, performance evaluation information, disciplinary and counseling information, termination information, drug testing paperwork and results. FFCU collects this information to make employment and/or job related decisions that involve you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment with FFCU, to assess qualifications for a particular job or task, to conduct performance reviews and determine performance requirements, for education, training, and development requirements, and to gather evidence for disciplinary action or termination, for other human resource administration purposes, and to administer and process employee benefits.
- Education information such as education history. FFCU collects this information to evaluate and make employment and/or job-related decisions that involve you, to provide you with employment with FFCU, to assess qualifications for a particular job or task, to conduct performance reviews and determine performance requirements, for education, training, and development requirements.
- Health and Safety Information relevant to your employment of potential employment, such as health conditions, job restrictions, workplace accident and illness information, health insurance policy information, and drug testing paperwork and results. FFCU collects this information to maintain a safe workplace, assess your working capacity and make necessary accommodations, administer health and Worker's Compensation programs, and comply with applicable laws.
- Network activity information such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. FFCU collects this information for confidentiality and security in order to be able to erase devices should data need to be protected. FFCU also collect this information to make employment and/or job-related decisions that involve you, to assess qualifications for a particular job or task, to conduct performance reviews and determine performance requirements, to gather evidence for disciplinary action or termination, and for other human resource administration purposes.

- Beneficiary Information of your beneficiaries, such as name and contact information, relationship to you, birth date, social security or other government identification number, and any other information necessary to process any benefits claims. FFCU collects this information to administer and process any related benefit claims.
- Emergency Contact Information of person(s) you designate as your emergency contact(s) such as their name and contact information, and their relationship to you. FFCU collects this information to maintain contact information should an emergency involving you arise during your employment.
- Biometric information such as fingerprints, facial scans, eye scans, voice recognition, typing cadence, and any other biometric identifier that we may use for security or other operational purposes. FFCU collects this information for detecting and protecting against security incidents and malicious, deceptive, fraudulent or illegal activities, or violations of FFCU policies, for fraud and crime prevention, and for information protection and cybersecurity. FFCU also collects this information to meet legal, compliance, and regulatory requirements and to defend FFCU's rights and property.
- Geolocation data such as GPS coordinates, location-tracking information, and physical location or movements. FFCU collects this information to make employment and/or job-related decisions that involve you, to assess qualifications for a particular job or task, to conduct performance reviews and determine performance requirements, to gather evidence for disciplinary action or termination, and for other human resource administration purposes.
- Profile information such as profiles reflecting a person's preferences, such as interests, hobbies, physical characteristics or description, characteristic tendencies, behaviors, attitudes or aptitudes, including information drawn from any personal information. FFCU collects this information to make employment and/or job-related decisions that involve you, to assess qualifications for a particular job or task, to conduct performance reviews and determine performance requirements, and to gather evidence for disciplinary action or termination, and for other human resource administration purposes.
- Audiovisual information such as on-site security cameras, pictures, videos, and audio recordings. FFCU collects this information for detecting and protecting against security incidents and malicious, deceptive, fraudulent or illegal activities, or violations of FFCU policies, for fraud and crime prevention, and for information protection and cybersecurity. FFCU also collects this information to meet legal, compliance, and regulatory requirements and to defend FFCU's rights and property. FFCU also collects this information to make employment and/or job-related decisions that involve you, to assess qualifications for a particular job or task, to conduct performance reviews and determine performance requirements, and to gather evidence for disciplinary action or termination, and for other human resource administration purposes.

FFCU will not collect additional categories of personal information or sensitive personal information or use the information collected for materially different, unrelated, or incompatible purposes without first providing you with additional and/or updated notice.

Data Storage and Security

FFCU shall use a reasonable standard of care to store and protect your personal information and sensitive personal information. We use appropriate physical, technical and organizational security measures and procedures to protect said information from unauthorized use, loss, alteration, destruction or modification. FFCU shall retain your personal information and sensitive personal information until the initial purpose for collecting and retaining such data has been satisfied, and/or longer, pursuant to applicable law. If you subsequently agree to a new or additional purpose, said information may be retained for that.

Disclosure to Third Parties

FFCU does not sell or share (as defined by the CCPA/CPRA) your personal or sensitive personal information to any third parties for any monetary consideration, nor has it done so in the 12 months preceding this policy. FFCU only discloses 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, and in connection with its human resource activities. FFCU also discloses your information when required to by local, state, or federal law.

Your Rights

You have the right to request that FFCU disclose certain information to you about our collection and use of your personal and sensitive information unless responding to the request is impossible or involves disproportionate effort. Once we receive and confirm your verifiable request, FFCU will disclose to you:

- The categories of personal information and sensitive information we collected about you.
- The categories of sources for the personal and sensitive information we collected about you.
- Our business or commercial purpose for collecting, using and/or disclosing that information.
- The categories of third parties, contractors and service providers with whom we share, sell or disclose that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list of those disclosures, identifying the personal information categories that each category of recipient obtained.
- Whether your information is sold or shared.
- The retention period or criteria used for retention.

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform any contract with you.
- Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

In certain circumstances, you have the right to request correction of any inaccurate personal information. Upon verifying the validity of a verifiable correction request, we will use commercially reasonable efforts to correct your personal information as directed, taking into account the nature of the personal information and the purposes of maintaining your personal information.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

To exercise any of your rights described above, please contact tsoto@ffcu.org or (800) 537-8491.

You may only make a verifiable request for access or data portability twice within a 12-month period. The verifiable request must:

- Provide enough information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

- 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. We will only use personal information provided in a verifiable request to confirm the requestor's identity or authority to make the request.

Notice for Applicants and Employees with Disabilities

FFCU is committed to providing our job applicants and employees with disabilities with the same level of access to this Privacy Notice that is available to our job applicants and employees without disabilities. Applicants and employees with disabilities may access this notice in an alternative format by contacting tsoto@ffcu.org.

Non-Discrimination

FFCU will not discriminate against you for exercising any of your CCPA or CPRA rights.

Changes to This Privacy Notice

FFCU reserves the right to update this Privacy Notice at any time, and will provide you with a new Privacy Notice when and if any updates are made. If FFCU would like to use your previously collected personal data for different purposes than those it notified you about at the time of collection, FFCU will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. FFCU may process your personal data without your knowledge or consent only where required by applicable law or regulation.

By signing below, I acknowledge and confirm that I have read and understand this disclosure.

Signature

Date

Print Your Full Name