



## California Privacy Rights Act / California Consumer Privacy Act Notice for Employees and Job Applicants

This notice (the “Notice”) applies solely to all job applicants, employees, owners, directors, officers, and contractors (collectively “employees”) of Altura Credit Union (the “Credit Union”).

**Summary of Your Rights:** The California Privacy Rights Act (“CPRA”) / California Consumer Privacy Act (“CCPA”) confer statutory rights that provide California consumers, including, but not limited to employees and job applicants, with greater control and transparency over the use of their personal information and sensitive personal information by affected companies operating within this state. These statutory rights, include, among other things, the protections listed below.

The Credit Union is committed to protecting the privacy and security of the information that it collects and being transparent about the business purposes for which this information is used. This Notice details the Credit Union’s practices in handling the information that it collects and uses in the employment context.

### 1. Categories of Personal Information and Sensitive Personal Information Collected by Altura Credit Union

When an individual applies to work for the Credit Union or over the course of a person’s employment, we may collect the following categories of personal information. The Credit Union collects and uses this information only as permitted or required by, and in compliance with applicable federal and state laws.

- 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;
- Signature, physical characteristics or description, telephone number, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, any other financial information, medical information, or health insurance information, and other personal information covered under California Civil Code § 1798.80(e);
- Characteristics of protected classifications (age, gender, race, etc.) under California or federal law;
- Sign-in and device information, including username and password, account name or number, and other online or device identifiers, Internet or other electronic network activity information such as browsing and search history and information regarding interactions with websites and applications, our systems, and networks;
- Educational, professional, and employment-Related Information, including employment, employment and education history, professional licenses, marital or domestic partner status, date of birth, age, gender, classifications (i.e. race or national origin) under applicable federal and state laws (including, but not limited to the Equal Employment Opportunity Act) medical condition or information, and health insurance information and policy number;
- Geolocation data, including badge access; and
- Financial information, including bank account, billing address, and information about your income and account balances.



## 2. Purposes for Which Personal Information Is Used

The Credit Union collects, processes, and retains your personal information and sensitive personal information for the following business purposes:

- Evaluating your application for a position with the Credit Union, including processing your application, assessing your qualifications for a specific role, conducting interviews, carrying out background and reference checks in accordance with applicable federal and state laws, and keeping records related to our hiring process;
- Managing compensation, benefits, and employment-related functions, including payroll processing, managing salaries and expenses, managing corporate credit cards and expense reimbursements, as well as administering equity, compensation, bonus, and insurance programs;
- Managing professional development and performance; and
- Ensuring that the Credit Union and its employees comply with all applicable federal and state laws (e.g., detecting security incidents, protecting against illegal activity, etc.);
- Maintaining the quality, safety, and performance of our operations, products, and services;
- Complying with other applicable legal obligations, including those related to tax and anti-discrimination laws; and
- *Other routine business purposes.*

## 3. Rights under CPRA / CCPA

- ***Right to Request and Receive Personal Information Disclosures under CPRA / CCPA (California Civil Code § 1798.100)***

Under CPRA / CCPA, a business that controls the collection of your personal information must, at or before the point of collection, inform you about: (1) the categories of personal information to be collected and the purposes for which the categories of personal information are collected or used, and whether such personal information is sold or shared; (2) the categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used, and whether such information is sold or shared; and (3) the length of time the business intends to retain each category of personal information and sensitive personal information, provided that such information is not retained for longer than is reasonably necessary for the disclosed purpose for which the information was collected.

- ***Right to Delete Personal Information under CPRA / CCPA (California Civil Code § 1798.105)***

Under CPRA / CCPA, you have the right to request the deletion of personal information that a business has collected from you. A business that collects personal information about consumers must disclose the right of consumers to request the deletion of their personal information. Accordingly, a business that receives a verifiable consumer



request for deletion must delete your personal information from its records and direct any service providers to delete your personal information from their records. Certain exceptions apply to these requests. A business or a service provider is not required to comply with your request to delete your personal information if it is reasonably necessary for the business or service provider to maintain your personal information in order to: (1) complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service that you requested, or reasonably anticipated by the consumer within the context of a business's ongoing business relationship with you, or otherwise perform a contract between the business and you; (2) help to ensure security and integrity to the extent that the use of your personal information is reasonably necessary and proportionate for those purposes; (3) debug to identify and repair errors that impair existing intended functionality; (4) exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; (5) comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the California Penal Code; (6) engage in public or peer-reviewed scientific, historical, or statistical research that adheres to all other applicable ethics and privacy laws, when the deletion of your information is likely to render impossible or seriously impair the ability to complete such research, if you have provided informed consent; (7) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the business and compatible with the context in which you provided the information; or (8) comply with a legal obligation.

- ***Right to Correct Inaccurate Personal Information under CPRA / CCPA (California Civil Code § 1798.106)***

Under CPRA / CCPA, you have the right to request the correction of any inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information. Upon receiving a verifiable consumer request to correct inaccurate personal information, we shall use commercially reasonable efforts to make any necessary correction(s), as directed by the consumer.

- ***Right to Know what Personal Information is Being Collected and Right to Access Personal Information (California Civil Code § 1798.110)***

Under CPRA / CCPA, you have the right to request that a business that collects your personal information disclose the following information: (1) the categories of personal information it has collected about consumers; (2) the categories of sources from which the personal information is collected; (3) the business or commercial purpose for collecting, selling, or sharing personal information; (4) the categories of third parties to whom the business discloses personal information; and (5) the specific pieces of personal information it has collected about you. A business that collects your personal information must disclose, pursuant to paragraph (3) of subdivision (a) of California Civil Code § 1798.130, the information cited above upon receipt of a verifiable consumer



request. A business that collects your personal information must disclose, pursuant to subparagraph (B) of paragraph (5) of subdivision (a) of California Civil Code § 1798.130 the information cited above.

- ***Right to Know what Personal Information is Sold or Shared, and to Whom*** (California Civil Code § 1798.115)

Under CPRA / CCPA, you have the right to request that a business that sells your personal information, shares your personal information, or discloses it for a business purpose, inform you of: (1) the categories of personal information that the business collected about you; (2) the categories of personal information that the business sold or shared about you and the categories of third parties to whom the personal information was sold or shared; and (3) the categories of personal information that the business disclosed about you for a business purpose, and the categories of persons to whom it was disclosed for a business purpose. A business that sells or shares your personal information, or that discloses your personal information for a business purpose, must disclose, pursuant to paragraph (4) of subdivision (a) of California Civil Code § 1798.130, the information cited above upon receipt of a verifiable consumer request. A business that sells or shares your personal information, or that discloses your personal information for a business purpose, must disclose, pursuant to subparagraph (C) of paragraph (5) of subdivision (a) of California Civil Code § 1798.130: (1) the category or categories of consumers' personal information it has sold or shared, or if the business has not sold consumers' personal information, it must disclose that fact; and (2) the category or categories of consumers' personal information it has disclosed for a business purpose, or if the business has not disclosed the consumers' personal information for a business purpose, it must disclose that fact. Under CPRA / CCPA, a third party is prohibited from selling personal information about a consumer that has been sold to the third party by a business unless the consumer has received explicit notice and is provided an opportunity to exercise the right to opt-out pursuant to California Civil Code § 1798.120. **Please note that the Credit Union does not sell your personal information and sensitive personal information.**

- ***Right to Opt-Out of the Sale or Sharing of Personal Information:*** Under CPRA / CCPA, you have the right, at any time, to direct a business that sells or shares your personal information not to sell or share your personal information. This right may be referred to as the "*Right to Opt-Out of Sale or Sharing.*" If a business has received direction from you not to sell or share your personal information, the business is prohibited from selling or sharing your personal information after its receipt of your direction, unless you subsequently provide your consent to sell or share your personal information. In the case of a minor consumer, the business is prohibited from selling or sharing the minor's personal information if it has not received consent to do so.

- ***Right to Limit Use and Disclosure of Sensitive Personal Information under CPRA / CCPA*** (California Civil Code § 1798.121)



Under CPRA / CCPA, you have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to the use(s) necessary to: (1) perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services; (2) effectuate the business purpose of helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for that purpose; (3) meet the business purpose of short-term and transient use, including, but not limited to non-personalized advertising shown as part of your current interaction with the Credit Union; (4) fulfill the business purpose for the Credit Union's performance services, including maintaining or servicing your account, providing customer service, processing or fulfilling orders or transactions, verifying your customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services; and (5) achieve the business purpose of undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the Credit Union, and to improve, upgrade, or enhance the service or device owned, manufactured, manufactured for, or controlled by the Credit Union.

- ***Right of Non-Retaliation Following Opt-Out of Exercise of Other Rights under CPRA / CCPA (California Civil Code § 1798.125)***

Under CPRA / CCPA, a business must not discriminate against you because you exercised any of your rights under the CPRA / CCPA; these prohibited discriminatory acts include, and are not limited to: (1) denying goods or services to you; (2) charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (3) providing a different level or quality of goods or services to you; (4) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services; and (5) retaliating against an employee, applicant for employment, or independent contractor for exercising their rights under CPRA / CCPA.

#### **4. Updates and Contact Information**

This Notice will be reviewed on at least an annual basis, and more frequently, if warranted. Any revisions to the Notice will be posted to the Credit Union's intranet or provided to you in writing, by email, or mail. If you have any questions or comments about this Notice and the ways in which the Credit Union collects and uses your information, please contact the HR department.