

LBS Financial Credit Union Privacy Policy for California Employees and Applicants

This **Privacy Policy for California Employees and Applicants** supplements the information contained in LBS Financial Credit Union's Privacy Policy found at <https://www.lbsfcu.org/california-online-privacy-notice> and applies solely to all job applicants, employees directors, officers, volunteers, or independent contractors of the Credit Union who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy rights Act of 2020 (CCPA), and its implementing regulations, and any terms defined in the CCPA have the same meaning when used in this Policy.

Information We Collect on Employees

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include publicly available information from government records, or deidentified or aggregated consumer information.

We retain this information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We may collect, receive, maintain, and use the Personal Information of contractors and current and former employees for the following business purposes:

1. To comply with local, state, and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, travel records, personnel files, wage and hour records, payroll records, accident or safety records, and tax records), as well as local, state, and federal law, regulations, ordinances, guidelines, and orders relating to COVID-19;
2. to evaluate job applicants and candidates for employment or promotions;
3. to obtain and verify background checks on job applicants and employees;
4. to manage the onboarding process;
5. to manage and process payroll and/or Company travel and expenses, employee recognition programs, pay increases and incentives;
6. to administer and maintain group health insurance benefits, 401K and/or retirement plans and to communicate with employees regarding employment-related matters such as upcoming benefits enrollment deadlines, action items, availability of W2s, and other alerts and notifications;

7. to evaluate, make, and communicate decisions regarding an employee’s employment, including decisions to hire, terminate, promote, train, demote, transfer, suspend or discipline;
8. to implement, monitor, and manage electronic security measures on employee devices that are used to access Company networks and systems and the creation, maintenance and security of your online employee accounts;
9. to communicate with employee’s family or other contacts in case of emergency or other necessary circumstance;
10. to manage workers’ compensation claims;
11. to manage employee performance of their job duties and/or employee conduct,
12. to identify potential symptoms linked to COVID-19 (including through temperature checks, antibody testing, or COVID-19 questionnaire), protect employees and customers from exposure to COVID-19, permit contact tracing relating to any potential exposure, communicate with employees and customers regarding potential exposure to COVID-19, and reduce the risk of spreading the disease in or through the workplace;
13. to promote and foster diversity and inclusion in the workplace;
14. to grant and monitor employees’ access to secure Company facilities, Credit Union Facilities, equipment and systems and maintain information on who accessed the facility;
15. to conduct workplace investigations (such as investigations of workplace accidents or injuries, harassment, or other misconduct) or internal audits;
16. to investigate and enforce compliance with and potential breaches of Credit Union policies and procedures;
17. to engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company;
18. to maintain commercial insurance policies and coverages, including for workers’ compensation and other liability insurance;
19. to perform workforce analytics, data analytics and benchmarking;
20. to administer and maintain the Credit Union’s operations, including for safety purposes;
21. to exercise or defend the legal rights of the Credit Union and its employees, affiliates, customers, contractors and agents.

The table below describes the categories of personal information we may have collected from employees and contractors within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Personal Information

| Category of Personal Information Collected | Business Purpose for Collection | Sold or Shared | Retention |
|---|--|-----------------------|--|
| Identifiers (A real name, alias, postal address, unique personal identifier, online identifier, | All reasons as stated above | No | Up to 7 years from date of termination of employment |

| | | | |
|--|----------------------------------|----|--|
| Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.) | | | |
| California Customer Records personal information (A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.) | All reasons as stated above | No | Up to 7 years from date of termination of employment |
| Protected classification characteristics under California or federal law (Age (40 years or older), 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, veteran or military status, genetic information (including familial genetic information). | 1,2,4,6,10,12,13,15,16,18,19, 21 | No | Up to 7 years from date of termination of employment |
| Biometric information (Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other | 1,11,14, 15,16,20,21 | No | Up to 7 years from date of termination of employment |

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|---|------------------------|----|--|
| physical patterns, and sleep, health, or exercise data.) | | | |
| Internet or other similar network activity (Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.) | 1,11,14,15,16,20,21 | No | Up to 7 years from date of termination of employment |
| Geolocation data (Physical location or movements.) | 1,11,14,15,16,20,21 | No | Up to 7 years from date of termination of employment |
| Sensory data (Audio, electronic, visual, thermal, olfactory, or similar information.) | 1,14,15,16,20,21 | No | Up to 7 years from date of termination of employment |
| Professional or employment-related information (Current or past job history or performance evaluations.) | 1,2,3,7,11,15,16,19,21 | No | Up to 7 years from date of termination of employment |
| Non-public education information (Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.) | 1,2,3,7,11,15,16,19,21 | No | Up to 7 years from date of termination of employment |
| Inferences drawn from other personal information (Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.) | 1,2,3,7,11,15,16,21 | No | Up to 7 years from date of termination of employment |

The table below describes the categories of **sensitive personal information** we may have collected from employees, or contractors within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Sensitive Personal Information

| Category of Sensitive Personal Information | Business Purpose for Collection | Sold or Shared | Retention |
|---|--|-----------------------|--|
| Government identifiers (social security, driver's license, state identification card, or passport number) | All reasons as stated above | No | Up to 7 years from date of termination of employment |
| Precise geolocation | 1,11,14,15,16,20,21 | No | Up to 7 years from date of termination of employment |
| Racial or ethnic origin | 1,2,4,6,7,13,15,16,18,19,21 | No | Up to 7 years from date of termination of employment |
| Religious or philosophical beliefs | 1,2,7,13,15,16,21 | No | Up to 7 years from date of termination of employment |
| Union membership | 1,2,3 | No | Up to 7 years from date of termination of employment |
| Genetic data | 1,2,6,13,14,15,16,21 | No | Up to 7 years from date of termination of employment |
| Mail, email, or text messages contents not directed to us | 1,2,12,14,15,16,21 | No | Up to 7 years from date of termination of employment |
| Unique identifying biometric information | 13,14,15,16,20,21 | No | Up to 7 years from date of termination of employment |
| Health information | 1,2,4,6,7,10,12,13,15,16,19,21 | No | Up to 7 years from date of termination of employment |
| Sex life, or sexual orientation information | 1,2,7,13,15,16,21 | No | Up to 7 years from date of termination of employment |

Information We Collect on Applicants

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include publicly available information from government records, or deidentified or aggregated consumer information.

We retain this information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal

information and whether we can achieve those purposes through other means, and the applicable legal requirements.

The table below describes the categories of personal information we may have collected from applicants within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Personal Information

| Category of Personal Information Collected | Business Purpose for Collection | Sold or Shared | Retention |
|--|--|-----------------------|---|
| <p>Identifiers (A real name, alias, postal address, unique personal identifier, date of birth, online identifier, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.)</p> | <ol style="list-style-type: none"> 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To evaluate your job application and candidacy for employment; 3. To obtain and verify background check and references; and 4. To communicate with you regarding your candidacy for employment. | No | 4 years from when the record was made or until no longer needed to comply with our legal obligations. |
| <p>California Customer Records personal information (A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.)</p> | <ol style="list-style-type: none"> 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To evaluate your job application and candidacy for employment; 3. To obtain and verify background check and references; and 4. To communicate with you regarding your candidacy for employment. | No | Same as above |
| <p>Protected classification characteristics under California or federal law (Age (40 years or older), race, color, ancestry, national origin,</p> | <ol style="list-style-type: none"> 1. To comply with state and federal law and regulations requiring employers to maintain certain records; | No | Same as above |

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|---|---|----|---------------|
| 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, veteran or military status, genetic information (including familial genetic information). | <ol style="list-style-type: none"> 2. To evaluate your job application and candidacy for employment; and 3. To obtain and verify background check and references. | | |
| Commercial information (Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.) | <ol style="list-style-type: none"> 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To obtain and verify background check and references. | No | Same as above |
| Professional or employment-related information (Current or past job history or performance evaluations) | <ol style="list-style-type: none"> 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To evaluate your job application and candidacy for employment; 3. To obtain and verify background check and references. | No | Same as above |
| Non-public education information (Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.) | <ol style="list-style-type: none"> 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To evaluate your job application and candidacy for employment; and 3. To obtain and verify background check and references. | No | Same as above |
| Inferences drawn from other personal information (Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.) | <ol style="list-style-type: none"> 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To evaluate your job application and candidacy for employment; | No | Same as above |

| | | | |
|--|--|--|--|
| | 3. To obtain and verify background check and references. | | |
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The table below describes the categories of **sensitive personal information** we may have collected from applicants within the last twelve (12) months, the business purpose for the collection of that information, whether that category of information is sold or shared and for how long that category of information will be retained:

Sensitive Personal Information

| Category of Sensitive Personal Information | Business Purpose for Collection | Sold or Shared | Retention |
|---|--|-----------------------|------------------|
| Government identifiers (social security, driver's license, state identification card, or passport number) | 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To evaluate your job application and candidacy for employment; 3. To obtain and verify background check and references; and 4. To communicate with you regarding your candidacy for employment. | No | Same as above |
| Racial or ethnic origin | 1. To comply with state and federal law and regulations requiring employers to maintain certain records. | No | Same as above |
| Religious or philosophical beliefs | 1. To comply with state and federal law and regulations requiring employers to maintain certain records. | No | Same as above |
| Union membership | 1. To comply with state and federal law and regulations requiring employers to maintain certain records; 2. To evaluate your job application and candidacy for employment; | No | Same as above |

| | | | |
|--|--|----|---------------|
| | <p>3. To obtain and verify background check and references; and</p> <p>4. To communicate with you regarding your candidacy for employment.</p> | | |
| Genetic data | <p>1. To comply with state and federal law and regulations requiring employers to maintain certain records.</p> | No | Same as above |
| Mail, email, or text messages contents not directed to us | <p>1. To comply with state and federal law and regulations requiring employers to maintain certain records;</p> <p>2. To evaluate your job application and candidacy for employment;</p> <p>3. To obtain and verify background check and references.</p> | No | Same as above |
| Health information | <p>1. To comply with state and federal law and regulations requiring employers to maintain certain records.</p> | No | Same as above |
| Sex life, or sexual orientation information | <p>1. To comply with state and federal law and regulations requiring employers to maintain certain records.</p> | No | Same as above |

Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you or your representatives;
- Other employees at the Credit Union;
- Your former employers, or other sources that provide employment verification;
- Employment agencies;
- Screening services, or other background check providers;
- Credit reference agencies;
- Public record sources (Federal, State or Local Government Sources);

- Information from our affiliates;
- Website/Mobile App Activity/Social Media;

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes, but any sensitive personal information we collect about the consumers is used or disclosed only for the purposes set forth in the CCPA and its implementing regulations and not for inferring characteristics about the consumer]:

- To maintain adequate human resources records.
- To provide you with facility access needed to complete your job duties.
- To verify eligibility, process your employee benefits information and administer benefits.
- To ensure that you are paid your earned income, and that our tax and other statutory dues are paid.
- To verify your qualification and suitability for a position.
- To evaluate and manage your job performance.
- To fulfill our commitment to workforce diversity;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our information systems, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- As otherwise required by applicable law.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing or Selling Personal Information

As used in this policy, and as defined in the CCPA, “share” means communicating a consumer's personal information to a third party for cross-context behavioral advertising. We do not share your personal information. In the preceding twelve (12) months, Credit Union has not shared personal information for cross-context behavioral advertising to the categories of third parties indicated in the chart below. We do not sell personal information.

We may disclose your personal information to a third party for a business purpose. In the preceding twelve (12) months, Credit Union has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

| Personal Information Category | Business Purpose | Third Party Categories |
|---|-------------------------|---------------------------------------|
| Identifiers. | Government Reporting | State and Federal Government Entities |
| California Customer Records personal information categories. | Government Reporting | State and Federal Government Entities |
| Protected classification characteristics under California or federal law. | Government Reporting | State and Federal Government Entities |
| Commercial information. | Government Reporting | State and Federal Government Entities |
| Professional or employment-related information. | Government Reporting | State and Federal Government Entities |
| Non-public education information. | Government Reporting | State and Federal Government Entities |
| Government identifiers | Government Reporting | State and Federal Government Entities |
| Racial or ethnic origin | Government Reporting | State and Federal Government Entities |
| Health information | Government Reporting | State and Federal Government Entities |

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. Please note, not all of the rights described here are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information (the "right to know"). Once we receive your request and confirm your identity (see [Exercising Your CCPA Rights](#)), depending on the information you request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, selling or sharing that personal information.
- The categories of third parties, if any, to whom we make available that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

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 (the "right to delete"). Once we receive your request and confirm your identity (see [Exercising Your CCPA Rights](#)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or contractor(s) to:

1. Complete the transaction for which we collected the personal information, provide a financial product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers, contractors and other third parties, if any, to take similar action.

Right to Correct

You have the right to request that we correct any inaccurate personal information that we maintain about you (the "right to correct"). Once we receive your request and confirm your identity (see [Exercising Your CCPA Rights](#)), we will review your request correct the inaccurate information.

Right to Opt-out of Sale or Sharing

We do not sell or share your personal information. Therefore, we are not required to provide you with the right to opt-out of sale or sharing.

Right to Limit

We only use a consumer's sensitive personal information for the purposes identified in the CCPA and its implementing regulations. Therefore, we are not required to give you notice of the right to limit the use of sensitive personal information or give you the opportunity to request that such information be limited.

Right to be Free from Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Exercising Your CCPA Rights

To exercise your rights to know, delete or correct described above, please submit a request by either:

- Calling us at 800.527.3328
- Emailing us at HR@lbsfcu.org
- Writing us at LBS Financial Credit Union, P.O. Box 4860. Long Beach, CA 90804-0860,

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete or correct related to your personal information.

You may only submit a request twice within a 12-month period. Your request to know, delete, or correct must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
 - Submitting a Valid California ID, California Driver's License, or CA Real ID.
- 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.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please email HR at HR@lbsfcu.org or by calling 800.527.3328

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. For a request to know, you may request information collected beyond the 12-month period provided the information was collected on or after January 1, 2022, and providing the information would not be impossible or involve disproportionate effort. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically in PDF format.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which LBS Financial Credit Union collects and uses your information described here and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 800.527.3328

Website: <https://www.lbsfcu.org>

Email: HR@lbsfcu.org

Postal Address:

LBS Financial Credit Union, Attn. HR,
P.O. Box 4860. Long Beach, CA 90804-0860

If you need to access this Policy in an alternative format due to having a disability, please contact HR at HR@lbsfcu.org or 800.527.3328.

Date Last Updated: June 23, 2023