

# California Consumer Privacy Policy for Employees and Applicants

Last Updated: February 2024

The purpose of this California Consumer Privacy Policy for Employees and Applicants (the “Policy”) is to provide you with a comprehensive description of San Diego County Credit Union’s (“SDCCU®”) online and offline privacy practices, consistent with the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”). It also provides information about your rights you may have regarding your personal information and how to exercise those rights. We may update and make changes to this policy, so we encourage you to review it periodically.

## Applicability

This California Consumer Privacy Policy for Employees and Applicants (the “Policy”) applies only to San Diego County Credit Union® (“SDCCU”) employees and applicants that reside in the state of California. This Policy is intended to supplement our “California Consumer Privacy Notice,” available online at <https://www.sdccu.com/CaliforniaConsumerPrivacyNotice>, and our “Online and Mobile Privacy Policy,” available online at <https://www.sdccu.com/privacy-policy/>, both of which apply generally to website users and consumers of SDCCU’s financial products and services.

This Policy also does not apply to information we collect, process, or disclose about California residents who apply for or obtain our financial products and services for personal, family, or household purposes (i.e., information subject to the Gramm-Leach-Bliley Act or California Financial Information Privacy Act). For more information about how we collect, use, and disclose information for members, please refer to our U.S. Consumer Privacy Notice.

## Your Personal Information

As mentioned above, this Policy is limited to information collected from job applicants and employees in the course of applying for or holding employment with SDCCU. It supplements our online and mobile privacy policy, which generally applies to anyone who uses our website or financial services. Please review that policy to learn about the information we collect, the sources from which we collect it, the purpose for collecting it, and instances where we may share it.

In the past 12 months, we have collected the following categories of Personal Information (meaning any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household) relating to California applicants and employees for the following purposes:

Category of Personal Information	Sources of Information	Purpose(s)
Personal identifiers (e.g., 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 similar)	Employees and applicants; public records	Assessing qualifications for the job; contacting applicants regarding an application; contacting employees regarding employment; conducting background checks and security clearances; establishing eligibility to work in the United States; contacting others in the event of an emergency; payment of

Category of Personal Information	Sources of Information	Purpose(s)
		wages; taxes; administering employee benefits
Family information (e.g., names and ages of dependents)	Employees and applicants	Contacting others in the event of an emergency; administering employee benefits; taxes
Personal insurance coverage (e.g., car insurance, health insurance)	Employees and applicants	Establishing ability to perform certain job duties; administering employee benefits; taxes
Medical and health information (e.g., work restrictions, allergies, immunization records)	Employees and applicants; occupational health providers; authorized health care providers	Establishing ability or skill to perform certain job duties; administration of employee benefits; prevention of communicable disease; administering leaves of absence; providing reasonable accommodations; administering Employee Wellness programs and incentives as permitted by law
Physical characteristics or description (e.g., clothing size)	Employees and applicants	Providing Company uniforms or personal protective equipment, providing fringe benefits; providing reasonable accommodations
Professional, employment, and educational information	Employees and applicants; third party reference checks; third party background checks	Assessing qualifications and suitability for new or continued employment, promotion, and transfer; establishing ability or skill to perform certain job duties; creating profiles for Company directories and websites
Financial information (e.g., bank account number, credit card number, debit card number, transaction history)	Employees and applicants	Conducting background checks and security clearances; payment of wages; business expense reimbursement
Company purchase and transaction history	SDCCU systems	Accounting; providing fringe benefits; taxes; conducting internal investigations; enforcing Company policy
Characteristics of protected classifications under California or federal law (e.g., race, sex)	Employees and applicants	Compliance with reporting obligations relating to equal opportunity and pay transparency; conducting internal investigations
Audio or visual information (e.g., photographs, video, or recordings)	Employees and applicants; SDCCU security and	Company security; creating profiles for Company directories and websites; conducting internal investigations; enforcing Company policy

Category of Personal Information	Sources of Information	Purpose(s)
	technology resources	
Biometric information (e.g., fingerprints, facial recognition software)	Employees and applicants; SDCCU security and technology resources	Conducting security clearances; Company security; log-in and access to Company resources including applicable timekeeping systems.
Communications using Company-owned electronic equipment or systems, or personal mobile devices used for Company business	SDCCU technology resources; Employees	Company security; conducting internal investigations; enforcing Company policy
Geolocation data (e.g., your precise location associated with a tracking program or device in Company laptops, desktops or vehicles)	SDCCU technology resources	Company security; conducting internal investigations; protecting Company property and equipment; ensuring a safe workplace; enforcing Company policy
Job performance and workplace conduct (e.g., performance evaluations, complaints, disciplinary investigations)	Workplace observation	Assessing qualifications and suitability for new or continued employment, promotion, and transfer; conducting internal investigations; enforcing Company policy; ensuring a safe workplace; assessing productivity and efficiency
Screening tests reports, assessments, or results (e.g., skills assessments, behavioral assessments)	Employees and applicants; SDCCU technology resources	Assessing qualifications for the job; establishing ability or skill to perform certain job duties; performance coaching
Productivity/Quality Assurance	Employees and applicants; SDCCU technology resources	Assessing productivity and efficiency in job role based on requirements and expectations of the job, department and organization
Memberships and affiliations (e.g., union or trade association memberships)	Employees and applicants	Assessing qualifications and suitability for new or continued employment, promotion, and transfer
Internet or other electronic network activity information (e.g., browsing history, telephone records, and other activity on Company networks and devices)	SDCCU technology resources	Enforcing Company policy; conducting internal investigations; Company security; assessing productivity and efficiency
Signed agreements, acknowledgments, and contracts	Employees and applicants	Enforcing Company policy; carrying out Company obligations and enforcing rights arising from any agreement entered into

Category of Personal Information	Sources of Information	Purpose(s)
		between employees or applicants and the Company, including any agreements relating to the use of confidential information or arbitration

In addition to the above, SDCCU collects personal information to comply with recordkeeping obligations under federal, state, or local law, to defend and exercise legal claims, or where employees and applicants have given consent.

We will not retain your personal information for longer than necessary. Different retention periods apply for different types of personal information. Further details on this are available in the Notice at Collection, available from Human Resources.

Any sensitive personal information, such as social security numbers or financial information, is collected without the purpose of inferring characteristics about an employee or applicant.

[Disclosure of Your Personal Information](#)

The Company does not sell any of the information listed above, meaning we do not give your personal information to any third party in exchange for monetary or other valuable consideration. We also do not share any of the information listed above to any third party for the purpose of cross-context behavioral advertising. We only allow our service providers to handle your personal information if we are satisfied, and they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers, contractors, and third parties to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

[Your Rights](#)

If you are a California employee or applicant, you have the following categories of rights:

*Disclosure of Personal Information We Collect About You*

You have the right to know and request disclosure of the following:

- The categories of personal information we have collected about you, including sensitive personal information;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting, selling, or sharing personal information;
- The categories of third parties to whom we disclose personal information, if any; and
- The specific pieces of personal information we have collected about you.

Please note that we are not required to:

- Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;
- Re-identify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
- Provide the personal information to you more than twice in a 12-month period request.

#### *Deletion of Personal Information*

You also have the right to request that we delete information we have collected from you, subject to certain exceptions (for example, personnel records we are required to maintain by law).

#### *Correction of Personal Information*

If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information, subject to exceptions. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.

#### *Disclosure of Personal Information Sold, Shared, or Disclosed to a Third Party for a Business Purpose*

In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:

- The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared; and
- The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose.

#### *Opting Out*

You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. However, we do not sell or share personal information of employees or applicants.

#### *No Retaliation or Discrimination*

You have the right to not be retaliated against or discriminated against in the terms of conditions of employment because you exercised any of your rights under the CCPA/CPRA.

### Exercising Your Rights

If you would like to exercise any of your rights as described in this Policy, you or your authorized agent can do so here: <https://www.sdccu.com/CaliforniaConsumerPrivacyRightsForm>. You or your authorized agent may also call us at (877) 732-2848, or submit a request form available from Human Resources. If you are using an authorized agent to make your request, we may require proof of authorization.

Please note that you may only make a request twice within a 12-month period.

If you contact us via telephone or website, you will need to provide us with:

- Enough information to identify you;
- Proof of your identity and address; and
- A description of what right you want to exercise and the information to which your request relates.

Upon submission of your request, we will take steps to verify your identity. Those steps may vary depending on how you have submitted your request and your relationship to us; for example, we may try to match your information to information we already have in our records. Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

The Company will protect the privacy of information collected in accordance with applicable state, federal, and local laws. If you have any questions about the use of your personal information, or would like to receive this notice in a different format to accommodate a disability, please contact Human Resources at (877) 732-2848.