Teachers Federal Credit Union California HR Privacy Notice

Privacy Information for California Applicants

We collect Personal Information from Applicants and comply with the California Consumer Privacy Act ("CCPA") and California Privacy Rights Act ("CPRA"), together referred to as "California Privacy Law." This California HR Privacy Notice applies to California Applicants ("you" or "your").

For the purposes of this California HR Privacy Notice, "Personal Information" means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Information:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of California Privacy Law.

This Privacy Notice provides the following information to California Applicants:

- Categories of Personal Information we collect;
- Purposes for which we use Personal Information;
- Categories of Personal Information we disclose to third parties;
- Categories of third parties to which we disclose Personal Information; and
- How Applicants can exercise their rights under California Privacy Law:
 - o The rights to access, correct, or delete Personal Information;
 - o The right to obtain a portable copy of Personal Information;
 - o The right to limit the use of sensitive Personal Information in certain circumstances;
 - o The rights to opt out of the sharing of Personal Information for behavioral advertising, sales of Personal Information, or certain profiling.

Categories of Non-Sensitive Personal Information

The table below outlines the non-sensitive categories of Personal Information Teachers Federal Credit Union ("Teachers") collects about Applicants and whether and how they are disclosed to third parties.

We collect Non-Sensitive Personal Information from the following sources:

- Directly from our Applicants
- Inferences from other data or your activity
- From our advertising partners

Category of Personal Information: Identifiers

Examples

Identifiers may contain the following: Name, home addresses, personal email addresses and personal phone numbers

Purpose(s)

Providing Personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations and to improve services

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Category of Personal Information: Personal Characteristics

Examples

Personal Characteristics may contain the following: gender, age

Purpose(s)

Providing Personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Category of Personal Information: Commercial Information

Examples

Commercial Information may contain the following: Data subject history

Purpose(s)

Providing personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations and to improve services

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Category of Personal Information: Professional Information

Examples

Professional Information may contain the following: employment history

Purpose(s)

Providing personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Category of Personal Information: Educational Information

Examples

Educational Information may contain the following: attendance

Purpose(s)

Providing personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Category of Personal Information: Inferences

Examples

Inferences may contain the following: using internal proprietary software analytics, "inferences" may be drawn upon the information we collect. These inferences may include, but are not limited to: significant life events such as graduation

Purpose(s)

Providing personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Categories of Sensitive Personal Information

The table below outlines the categories of Sensitive Personal Information Teachers collects about Applicants and whether they are shared with third parties.

We collect Sensitive Personal Information from the following sources:

- Directly from our Applicants
- Inferences from other data or your activity
- From our advertising partners

Category of Sensitive Personal Information: Government ID Data

Examples

Government ID Data may contain the following information: Social Security number

Purpose(s)

Providing personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Category of Sensitive Personal Information:
Sensitive Category Data

Examples

Sensitive Category Data may contain the following information: race and ethnicity.

Purpose(s)

Providing personalized HR services, Improvement of employment experiences or services, Compliance with statutory obligations

Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

Sale

We do not sell Personal Information to anyone

Sharing

This data is not shared with third parties

Retention Period

We retain this information throughout the employment period and for four years post-termination

Use of Personal Information

We use Personal Information for the purposes described above. Other examples of how we may use your Personal Information within Teachers include:

 Sharing applicants' submitted Personal Information with our HR department and other employees to process applications.

Personal Information may also be used or disclosed as otherwise permitted or required by applicable law.

Disclosing Personal Information

We share Personal Information with the following categories of third parties:

• Processors: We use processors to securely handle Personal Information on our behalf and only on our instructions. These companies may not use your Personal Information for their own purposes.

See the tables above for more details about how different categories of Personal Information are shared.

We do not sell Personal Information to anyone.

Exercising Your Personal Information Rights

California Applicants have the following rights under California Privacy Law:

- The rights to access, correct, or delete Personal Information;
- The right to obtain a portable copy of Personal Information;
- The right to limit the use of Sensitive Personal Information in certain circumstances; and
- The rights to opt out of the sharing of Personal Information for behavioral advertising, sales of Personal Information, or certain profiling.

If you are a California Applicant, you can submit a request to exercise your Personal Information rights under California Privacy Law by contacting us at HRprivacy@teachers.fcu.org with the subject line "California HR Privacy Rights Request" or by calling the HR California Privacy Request hotline at 866-231-7866. To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will use commercially reasonable efforts to verify your identity for this purpose. Any information you provide to authenticate your identity will only be used to process your rights request. Please be aware that we do not accept or process rights requests through other means (e.g., via fax or social media).

After submitting your request online, you will receive a follow-up email, which may include a link you must click on in order to verify your identity. If you do not click on that link, we may be unable to complete your request due to lack of verification. It is important that you provide a valid email address in order for us to be able to process your request.

We will respond to your request within forty-five (45) days, though in certain cases we may inform you that we will need up to another forty-five (45) days to act on your request. If we suspect fraudulent or malicious activity on or from your account, we will delay taking action on your request until we can appropriately verify your identity and the request as authentic. Also, please note that each of the rights are subject to certain exceptions.

We reserve the right to decline to process, or charge a reasonable fee for, requests from an applicant that are manifestly unfounded, excessive, or repetitive.

<u>Limiting the Use of Sensitive Personal Information</u>

California Privacy Law provides a right to limit some uses of Sensitive Personal Information. In particular, you may direct Teachers not to use Sensitive Personal Information except as necessary to provide goods or services you have requested. You may submit a request to limit the use of your sensitive Personal Information by submitting a rights request as described above.

Authorized Agent Requests

California Privacy Law allows you to designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by following the same method described above. We may require verification of your authorized agent in addition to the information for verification above for Applicants and households.

Contact Us

If you have any questions or concerns regarding this California HR Privacy Notice, contact us at <a href="https://hr.ncbi.nlm.ncb

Last updated: October 3, 2023