



Your privacy is important to us. This California Consumer Privacy Act (CCPA) Employee/Contractor Privacy Notice supplements the information contained in the CCPA Consumer Privacy Notice and describes how Educational Employees Credit Union (“EECU”, “we”, “us”, “our”) collects, shares, uses, and protects personal information subject to the CCPA collected through your online and offline interactions with us.

**APPLICATION OF THIS NOTICE**

This Notice applies to natural residents of the State of California from whom we collect personal information in the course of their acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of Educational Employees Credit Union to the extent that their personal information is collected and used by Educational Employees Credit Union solely within the context of the their role or former role as a job applicant to, an employee of, owner of, director of, officer of, or contractor of Educational Employees Credit Union.

**PERSONAL INFORMATION WE COLLECT**

Under the CCPA, Personal Information (PI) is information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. (Note that some categories overlap). We collect the following categories of personal information from you.

<b>Category of PI</b>	<b>Examples</b>
A. Identifiers	These include: real name, alias, postal address, signature, home or mobile phone number, bank account number, credit card number, debit card number, or other financial information, physical characteristics or description, email address, account name, Social Security Number, driver's license number, or state identification card number, passport number, or other similar identifiers.
B. Professional or Employment Related Information	These include: current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records.
C. Emergency Contact Information	These include: contact information such as the name, phone number, address, and email address of another person in the context of having an emergency contact on file.
D. Administration of Benefits	These include: name, Social Security Number, date of birth, telephone number, email, and address necessary for the administration of benefits for you or another person related to you (e.g. your spouse, domestic partner, and dependents)
E. Protected Classification Characteristics Under State or Federal Law	These include: age 40 years of 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 or genetic information (including familial genetic information).
F. Commercial Information	These include: records of personal property, products or services purchased, obtained, or considered, other purchasing or consuming histories or tendencies.
G. Biometric Information	These include: genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
H. Internet or Other Similar Network Activity	These include: browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

I. Geolocation Data	These include: physical location or movements. For example, the location associated with your IP address and, with your permission in accordance with your mobile device settings, precise geolocation information from GPS-based functionality on your mobile devices.
J. Sensory Data	These include: audio, electronic, visual, thermal, olfactory, or similar information.
K. Non-public Education Information (per the Family Educational Rights and Privacy Act)	These include: education records such as grades, transcripts, class lists, student identification codes, student financial information, or student disciplinary records.
L. Inferences Drawn From Other Personal Information	These include: profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information for purposes of the CCPA does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## HOW WE USE YOUR PERSONAL INFORMATION

EECU may use or disclose personal information collected for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- Determining eligibility for employment.
- Verifying of references and qualifications.
- Improve internal business operations.
- To fulfill our obligations to you as an employee, including for processing payroll, benefits, insurance, retirement, employee incentive plans, and HR record keeping that may include information on promotions, discipline, and compensation.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- As necessary or appropriate to protect the rights, property or safety of us, consumers or others.
- 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.

## SALE OF PERSONAL INFORMATION

**EECU does not sell your personal information and we have not done so in the preceding 12-months.**

## SHARING YOUR PERSONAL INFORMATION

EECU may disclose your personal information to third-parties for our business purposes. When we disclose personal information for a business purpose, we enter into a contract that describes the purposes and requires the recipients to keep that personal information confidential and not use it for any purpose except for the performance of the contract. The general categories of third-parties that we share with are as follows:

- Service providers we use to help deliver benefits and services related to your prospective or actual employment, such as identity verification providers, payment service providers, time and attendance programs, benefits programs, and more;
- Third parties approved by you (e.g., your legal counsel); and
- Law enforcement and government entities where required by law.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## **YOUR RIGHTS AND CHOICES**

You have a number of legal rights when it comes to your Personal Information, including the right to be informed about the Personal Information we collect and the purposes for which we use your Personal Information.

As applicants and employees, you do not have a right to request to access or have us delete any Personal Information we maintain about you. However, you can request certain details about the Personal Information we maintain about you in order to ensure its accuracy. Please contact the Human Resources Department if you would like further information.

## **CHANGES TO OUR CCPA PRIVACY NOTICE**

We reserve the right to amend this Privacy Notice at our discretion and at any time.

## **ACCESSIBILITY**

Educational Employees Credit Union is committed to ensuring that our communications are accessible to individuals with disabilities. Individuals with disabilities can access this policy in alternative formats by contacting the Human Resources Department.

## **CONTACT INFORMATION**

If you have questions or comments about this Notice, the ways in which we collect and use your personal information, or wish to make a CCPA request, contact us by calling our Member Service Center at (800) 538-3328, by mail at Educational Employees Credit Union Attn: Human Resource Dept, P.O. Box 5242, Fresno, CA 93755-5242. Please visit our CCPA Consumer Privacy Notice on our website at [MyEECU.org](http://MyEECU.org) for more information about the ways in which we collect and use your personal information and your choices and rights regarding such use under California law.

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