

Seattle Bank's California Consumer Privacy Act (CCPA)

Employee and Applicant Disclosure

Last Update: 04/11/2023

This California Consumer Privacy Act Notice ("Notice") is provided by Seattle Bank and is referred to in this Notice as "we," "us," or "our," and applies to all California employees or applicants referred to as "employee," "you" or "your." Respecting the privacy of our existing and potential employees is an essential part of our privacy program. We are committed to the proper handling of the Personal Information collected or processed in connection with your existing or potential employment relationship with us. This disclosure describes categories of Personal Information we collect and the purposes for which we process that information in accordance with section 1798.100 (b) of the California Consumer Privacy Act. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (the "CPRA"). The CCPA only applies to information about residents of California. We advise that you read the Notice in its entirety. Sections I and II of this Notice, which describes our collection and use of information, also serves as our **Notice At Collection** for California residents for purposes of the CCPA.

Under the CCPA, "personal information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This information is referred to in this Notice as "Personal Data."

I. Categories of Personal Data that We Collect

Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural, and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

We collect, receive and maintain the following categories of Personal Data for current and former employees as follows:

1. **Personal Identifiers** — Personal unique identifiers, such as real name, alias, postal address, telephone number, email address, mother's maiden name, place of birth, high school attended, and federal or state issued identification numbers including Social Security number, individual taxpayer identification number, driver's license number, and passport number.
2. **Personal Information** — Personal information, including contact details, financial information (e.g., account number and balance, transaction history, credit history, credit score), payment card details (e.g., credit and debit card numbers), and medical and health insurance information as well as personal information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)).

3. **Characteristics of Protected Classes** — Characteristics of protected classes or groups under state or federal law, such as gender, age/date of birth, race, disability, military status, citizenship, immigration status, and marital status.
4. **Internet or Online Information** — Internet or online information (e.g., IP Address, information in cookies and pixel tags, browsing history) and information regarding interaction with our websites, applications, or advertisements (e.g., device identifier or identifying information, characteristics, or settings about the device you use to access our online services, and mobile device information (with permission, such as location, contacts, camera)).
5. **Geolocation Data** — Geolocation data, such as device location.
6. **Employment Information** — Professional or employment-related information, such as work history and prior employer, title, salary, references, information from background checks, resumes, and employment files.
7. **Education Information** — Education information subject to the federal Family Educational Rights and Privacy Act, such as student records and confirmation of graduation; and student financial information, including tuition costs and reimbursement.
8. **Sensitive Personal Information** —
 - Social Security number, individual taxpayer identification number, driver’s license, state identification card, or passport number;
 - Precise geolocation;
 - Racial or ethnic origin, religious or philosophical beliefs, citizenship, or immigration status; and
 - Biometric information processed to uniquely identify an individual.

II. Why We Collect Personal Data and How We Use and Disclose It

1. To comply with state and federal law and regulations requiring employers to maintain certain records (such as immigration compliance records, personnel files, wage and hour records, payroll records, accident or safety records, or tax records.)
2. To process payroll;
3. To track time and attendance;
4. To manage workers’ compensation claims;
5. To administer and maintain benefits, including group health insurance, 401K and/or retirement plans;
6. To administer and maintain retirement service;
7. To manage employee performance of their job duties, including promotions, discipline, and/or termination;
8. To conduct workplace investigations;
9. To evaluate job applicants and candidates for employment or promotions;
10. To obtain and verify background checks;

11. To grant and monitor employees' access to secure company facilities and maintain information on who accessed the facility;
12. To evaluate, make, and communicate decisions regarding an employee's employment, including decisions to hire, terminate, promote, demote, transfer, suspend or discipline; to communicate with employees regarding employment-related matters such as upcoming benefits enrollment deadlines, action items, availability of W2s, and other alerts and notifications;
13. To implement, monitor, and manage electronic security measures on devices that are used to access networks and systems (e.g., incident management);
14. To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of the Company;
15. To maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance;
16. To anonymize and/or aggregate data to perform workforce analytics, data analytics, and benchmarking;
17. To perform call monitoring and surveillance (e.g., CCTV).

Sources of Personal Data

The information below lists the categories of sources from which we collect Personal Data in connection with our Employees.

- Directly from you, or other individuals acting on their behalf. For example, documents that you provide us related to the product(s) or service(s) for which you engage us through physical (e.g., paper application), audible (e.g., phone), and electronic (e.g., website, social media) sources.
- Indirectly from you. For example, through information we collect from you in the course of checking provided references.
- Public records or widely available sources, including information from the media, and other records and information that are made available by federal, state, and local government entities.
- Outside companies or organizations from whom we collect Personal Data to support human resource and workforce management activities. Examples may include operating systems and platforms, and social networks.

III. Categories of Third Parties and Our Disclosure of Personal Data

The information below lists the categories of recipients we may disclose Personal Data to for our business or commercial purposes:

- Outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, to whom we disclose Personal Data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples may include internet service providers, social networks, operating systems

and platforms, advertising networks, and data analytics providers; companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.

- Companies or individuals that represent California residents such as an accountant, financial advisor, or person holding power of attorney on behalf of a California resident.
- Government agencies including to support regulatory and legal requirements.
- Outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, to whom we provide Personal Data to support human resource activities and workforce management. Examples may include operating systems and platforms and data analytics providers.
- Outside companies or organizations, in connection with routine or required reporting.

The table below shows, for each Personal Data category we have collected, the categories of third parties to whom we disclosed for our business purposes information from that Personal Data category during the preceding 12 months. The table below contains briefer descriptions of the categories of Personal Data and third parties. The full descriptions of the categories of Personal Data and third parties are available above. We may also disclose any of the categories of personal information listed below: (1) for risk, legal, or compliance purposes; (2) because of a business transfer (or potential business transfer); or (3) based on your consent or instruction.

Personal Data Type	Third Party Category to Whom We May Disclosed Personal Data for Business Purposes
Personal Identifiers	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Personal Information	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting

Characteristics of Protected Classes	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Internet or Online Information	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Geolocation Data	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Employment Information	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Education Information	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting
Sensitive Personal Information	<ul style="list-style-type: none"> ▪ Outside organizations in connection with providing products and services, completing transactions, supporting our everyday operations, or business management and development ▪ Representatives of California residents, Professional Advisors, Business Partners ▪ Government agencies ▪ Outside organizations in connection with human resource activities and workforce management ▪ Outside companies in connection with routine or required reporting

Additional Notes:

- We only use and disclose sensitive personal information to third parties, service providers, and contractors for the business purposes outlined in this notice. The business purposes are what you would reasonably expect are in furtherance of your current, former or potential employment with us. We do not collect or use your sensitive personal information for the purpose of inferring characteristics about you.
- We may disclose anonymous or aggregated information with third parties to help deliver human resources related products, services, and content that are tailored to your employment relationship with us and for other purposes.

IV. Data Retention

We retain your Personal Data no longer than the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. We will retain copies of your personal information needed to maintain an ongoing relationship with you (e.g., while you remain an employee). Under our record retention policy, we are required to destroy Personal Data after we no longer need it according to specific retention periods. However, we may need to retain all, or a portion, of your Personal Data to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes. These requirements also apply to our third-party service providers.

V. Requests Under the CCPA

The CCPA defines a “sale” as the disclosure of Personal Data for monetary or other valuable consideration. Seattle Bank does not sell and has not, within at least the last 12 months, sold Personal Data, including Sensitive Personal Data that is subject to the CCPA’s sale limitation. We do not share Personal Data for cross-context behavioral advertising within the scope of CCPA. We have no actual knowledge that we sell or share Personal Data of California residents 16 years of age and younger.

If you are a California resident, you have the right to make certain requests about Personal Data:

1. **Access:** You may have the right to request access to Personal Data and information regarding the source of that information, the purposes for which we collected it, and the third parties and service providers with whom we shared it. You can also request information concerning the categories of Personal Information (if any) we share with third parties or affiliates for those parties to use for direct marketing. In certain limited circumstances, you may also request to receive access to your data in a portable, machine-readable format.
2. **Deletion:** You may have the right to request that Personal Data be deleted. Note that in many situations, we may be permitted, or required by law, to maintain copies of your information.
3. **Correction:** You may have the right to request modification to Personal Data that we retain about you. We generally rely on you to update and correct your Personal Data. Note that we may keep historical information in our backup files as permitted by law.

4. **Opt-Out of Sale of Information:** It is Seattle Bank's policy not to sell or share CCPA Personal Information, and we have not done so in the past 12 months. Because Seattle Bank does not sell or share your CCPA Personal Information, we do not offer an opt-out under the CCPA.

In addition, you have the right to be free from discrimination by a business for exercising your CCPA privacy rights, including the right as an employee, applicant, or independent contractor not to be retaliated against for exercising your CCPA privacy rights.

VI. Exercising Your Rights

If you are a California resident, you or your authorized agent can use any of the following methods to make a request to access, delete, or correct personal information by:

1. Contacting us at **1-888-500-2265**; or
2. Submitting your request at www.seattlebank.com/privacycenter

Please provide the following information to identify yourself:

- First and last name
- Contact information such as email and/or physical address
- Social security or individual taxpayer identification number
- Date of birth

Once a request to access, delete, or correct has been submitted, we will attempt to verify that you are the individual the request applies to. We do that by taking the identifying information you provide (e.g., name, email address, account-related information) and using a combination of other sources of information and the information we have on file. If we are unable to verify your request with the materials you provided, we may reach out to you for additional information.

Additional information regarding your right to correct inaccurate information: You may be able to review or update certain account information by logging in and accessing your online employee account. If you cannot change the incorrect information online, or you prefer to request changes offline, please Human Resources at **1-888-500-2265**.

Upon receipt of a verifiable request for information from you, or an authorized agent, we will promptly acknowledge your request and complete it within 45 days. If we need an additional 45 days to process your request, we will provide you with an explanation for the extension. We may deny any CCPA request where we have already provided personal information to you more than twice in a 12-month period.

VII. Responses

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Data that we collect, use, and disclose. When these other laws apply, Personal Data may be exempt from, or outside the scope of, a

request to access, delete, or correct. For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act or the Health Insurance Portability and Accountability, is exempt from CCPA requests. As a result, we may decline all, or part of your request related to exempt Personal Data. This means that we may not provide some, or all, of this Personal Data when you make a request to access. Also, we may not delete or correct some, or all, of this Personal Data when you make a request to delete or correct.

As examples, our processing of or response to a request to access, delete, or correct personal information may not include some or all of the following Personal Data:

- **Consumer Accounts.** Personal Data connected with consumer accounts used for personal, family, or household purposes. We have other privacy notices providing certain information on use and sharing of this data, for example, the Seattle Bank Privacy Notice, available at <https://www.seattlebank.com/privacy-policy.html>.

The types of Personal Data described above are examples. We have not listed all types of Personal Data that may not be included when we respond to or process requests to access, delete, or correct personal information.

In addition to the above examples, we may not include Personal Data when we respond to or process requests to access, delete, or correct personal information when the CCPA recognizes another exception. For example, we will not provide the Personal Data about another individual when doing so would adversely affect the data privacy rights of that individual. As another example, we will not delete Personal Data when it is necessary to maintain that Personal Data to comply with a legal obligation.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Data subject to the request.

VIII. Authorized Agents

If you are a California resident, you may authorize an agent to make a request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident by using the submission methods listed above under "Exercising Your Rights." As part of our verification process, we may request that you provide, as applicable:

- For an individual ("requestor") making a request on behalf of a California resident:
 - The requestor's name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, State ID, or Matricula Card.
 - The name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, State ID, or Matricula Card of the California resident on whose behalf the request is being made.
 - A document to confirm that the requestor is authorized to make the request. We may accept, as applicable, a signed permission by the California resident on whose behalf the request is

made, copy of a power of attorney, legal guardianship or conservatorship order, or a birth certificate of a minor if the requestor is the custodial parent.

IX. Deidentified Information

Where we maintain or use deidentified information, we will continue to maintain and use the deidentified information only in a deidentified fashion and will not attempt to re-identify the information.

X. Changes to this Notice

We reserve the right to amend this privacy notice at our discretion and at any time. We may change or update this Notice periodically. When we do, we will disseminate the amended Notice through your employee portal indicating when the Notice was "Last Updated."

If you have any questions about the collection and processing of your Personal Data or about the security of your Personal Data, please contact Human Resources at **1-888-500-2265**.

By signing below, I acknowledge and confirm that I have received and read and understand this Notice, and I hereby authorize and consent to Seattle Bank's use of the personal information it collects, receives or maintains for the business purposes identified above.