



## California Privacy Statement for Employment-Related Personal Information

This California Privacy Statement for Employment-Related Personal Information is for California Residents that are job applicants, past or current employees, directors or contractors of Alliant. This statement describes the Employment-Related Personal Information that Alliant Credit Union (“we,” “our,” or “us”) collects about a consumer acting as a job applicant or who is a past or current employee of, director or contractor of Alliant and their beneficiaries and dependents and explains how this information is collected, used, shared, and disclosed, describes rights provided by the California Consumer Privacy Act of 2018 (“CCPA”) to California Residents (“consumers” or “you”) regarding their Employment-Related Personal Information, and explains how consumers can exercise those rights.

Please note that, certain Employment-Related Personal Information we collect from you is exempt from disclosure because it is covered by or collected under the Fair Credit Reporting Act, the Health Insurance Portability and Accountability Act of 1996, or other exemptions provided in the CCPA.

### What is Employment-Related Personal Information?

We may collect, use, share or disclose Employment-Related Personal Information. Employment-Related 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 you or your beneficiaries or dependents collected about you acting as a job applicant or who is a past or current employee of, director or contractor of Alliant (“Employment-Related Personal Information”). Employment-Related Personal Information does not include: (1) publicly available information, such as information that is lawfully made available from federal, state, or local records, and (2) de-identified or aggregate consumer information. Under the CCPA, Sensitive Personal Information includes a consumer’s social security number, driver’s license, financial account or card number, precise geolocation, racial and ethnic characteristics, religious and philosophical beliefs, union membership, contents of mail, email and text messages and genetic and biometric data (“Sensitive Personal Information”).

With a limited exception, and as noted in other sections of this privacy statement, the CCPA does not apply to the following, collectively referred to as exempt Personal Information:

- Certain Personal Information covered by or collected under industry-specific privacy laws including, but not limited to, the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver’s Privacy Protection Act of 1994.

### Your Rights under the CCPA

As described in more detail below, the CCPA provides you with certain rights regarding the collection, use, retention, and disclosure of your Employment-Related Personal Information.

### Notice at Collection

#### **Employment-Related Personal Information We Collect, Use, or Disclose**

The CCPA requires us to disclose certain information regarding our collection, use, and sharing of Employment-Related Personal Information. The following table outlines the categories of Employment-Related Personal Information that we have collected about consumers in the last 12 months. For each category, if applicable, we have identified the categories of sources from which that information was collected and the categories of third parties to whom we disclose Employment-Related Personal Information subject to other privacy law opt-out requirements.

The business or commercial purpose for which the Employment-Related Personal Information is collected or shared include general Human Capital purposes (such as payroll and timekeeping), administration of benefits (such as retirement, health and other benefits),

hiring due diligence (including identification and authentication), hiring/ firing and disciplinary decisions, maintenance of emergency contact information, network monitoring, physical security (security badges), and responding to CCPA requests. The criteria used to determine the period of time we will retain each category of Employment-Related Personal Information is driven by our records retention schedule in compliance with the numerous rules, laws and regulations governing employment and financial institutions.

**We do not and will not sell Employment-Related Personal Information or share Employment-Related Personal Information with a third party for cross-contextual behavioral marketing. We do not use or disclose Sensitive Personal Information for purposes other than those permitted by the CCPA, such as to perform services or provide the goods reasonably expected by an average consumer. We do not collect biometric personal information, such as fingerprints, faceprints or voiceprints.**

Categories of Personal Information About Consumers	The Categories of Sources from Which the Personal Information is Collected	The Categories of Third Parties/Service Providers to Whom We Disclose Personal Information (provided other privacy law opt-outs do not apply)
<p><b>Identifiers.</b> This may include a 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 other similar identifiers</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>
<p><b>Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).</b> This may include 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>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>
<p><b>Characteristics of Protected Classification under California or Federal Law.</b> This may include age, 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).</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>

Categories of Personal Information About Consumers	The Categories of Sources from Which the Personal Information is Collected	The Categories of Third Parties/Service Providers to Whom We Disclose Personal Information (provided other privacy law opt-outs do not apply)
<p><b>Commercial information.</b> This may include records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>
<p><b>Biometric information.</b> This may include genetic, physiological, biological, or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish your identity.</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>
<p><b>Internet or other similar network activity.</b> This may include browsing history, search history, or information on a consumer’s interaction with a website, application, or advertisement.</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>
<p><b>Geolocation data.</b> This may include physical location or movements.</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>
<p><b>Sensory data.</b> This may include audio, electronic, visual, or similar information.</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>
<p><b>Professional or employment-related information.</b> This may include current or past job history or performance evaluations.</p>	<p>Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies</p>	<p>Payroll providers, Benefit providers, Human resource information system providers, Government Entities</p>

Categories of Personal Information About Consumers	The Categories of Sources from Which the Personal Information is Collected	The Categories of Third Parties/Service Providers to Whom We Disclose Personal Information (provided other privacy law opt-outs do not apply)
<b>Inferences drawn from other personal information.</b> This may include information, data, assumptions, or conclusions derived from facts, evidence, or another source of information or data reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies	Payroll providers, Benefit providers, Human resource information system providers, Government Entities
<b>Sensitive Personal Information.</b> This may include personal information the unauthorized use or disclosure of which creates a heightened risk of harm to the consumer.	Consumers Including You, Job Applicants, Employees, Contractors, Consumer Reporting Agencies	Payroll providers, Benefit providers, Human resource information system providers, Government Entities

***Disclosure of Employment-Related Personal Information***

In the preceding 12 months, we have disclosed Employment-Related Personal Information to third parties in order to carry out specific business or commercial purposes as described above. In the preceding 12 months, we have disclosed consumer Employment-Related Personal Information for business or commercial purposes to Service Providers and the following categories of third parties:

- Payroll service providers
- Benefit providers
- Human resource information system providers
- Government entities

In the last 12 months, we have disclosed the following categories of Employment-Related Personal Information (as described in more detail above) for a business or commercial purpose as described above:

- Identifiers
- Personal Information described in the California Customer Records Statute (see description above)
- Characteristics of Protected Classification under California or Federal Law
- Commercial information
- Internet or other similar network activity
- Professional or employment-related information
- Inferences drawn from other Personal Information
- Sensitive Personal Information

***Sale of Employment-Related Personal Information***

In the preceding 12 months, we have not sold any Employment-Related Personal Information and have not shared any Employment-

Related Personal Information with a third party for cross-contextual behavioral advertising. In addition, we do not and will not sell or share Employment-Related Personal Information in this manner.

### ***Use of Sensitive Personal Information***

We do not use or disclose Sensitive Personal Information for purposes other than those permitted by the CCPA, such as to perform services or provide the goods reasonably expected by an average consumer.

### **The Right to Know About Employment-Related Personal Information Collected, Used, or Disclosed**

You have the right to request that we provide you with certain information about your non-exempt Employment-Related Personal Information we collect, use, retain or disclose about you as well as the categories and specific pieces of information that we have collected about you in the 12 months before your submission of a verifiable consumer request to know. Specifically, you have the right to request the following information provided it is not exempt from the CCPA as discussed above:

- The categories of Employment-Related Personal Information we have collected about you.
- The categories of sources from which we have collected Employment-Related Personal Information about you.
- Our business or commercial purpose for collecting or sharing your Employment-Related Personal Information.
- Our business or commercial purpose for disclosing the category of Employment-Related Personal Information about you.
- The specific pieces of Employment-Related Personal Information we have about you.
- If we disclosed your Employment-Related Personal Information for a business purpose:
  - The categories of Employment-Related Personal Information that we disclosed about you for a business purpose; and
  - The categories of third parties to whom your Employment-Related Personal Information was disclosed for a business purpose, and which category of Personal Information was disclosed to that third party.

However, there is certain information that we will not disclose to you. This information includes but is not limited to your Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers. Also, we will not provide you with specific pieces of Employment-Related Personal Information if the disclosure creates a substantial, articulable, and unreasonable risk to the security of that Employment-Related Personal Information, your account with us, or the security of our systems or networks.

### **The Right to Request Deletion of Employment-Related Personal Information**

You have the right to request that we delete your non-exempt Employment-Related Personal Information that we have collected and maintained. A household may request the deletion of aggregate household, non-exempt Employment-Related Personal Information by submitting a verifiable consumer request. If all consumers in a household jointly request deletion of household, non-exempt Employment-Related Personal Information, and we can individually verify all the members of the household, then we will comply with the request.

### **The Right to Request Correction of Inaccurate Employment-Related Personal Information**

You have the right to request that we correct your inaccurate non-exempt Employment-Related Personal Information that we have collected and maintained. A household may request the correction of aggregate inaccurate household, non-exempt Employment-Related Personal Information by submitting a verifiable consumer request. If all consumers in a household jointly request correction of inaccurate household, non-exempt Employment-Related Personal Information, and we can individually verify all the members of the household, then we will comply with the request.

We will consider the totality of the circumstances relating to the contested non-exempt Employment-Related Personal Information and if it is determined that based on that analysis the contested Employment-Related Personal Information is more likely than not to be accurate, we may deny your request to correct your Employment-Related Personal Information. We may delete the contested Employment-Related Personal Information as an alternative to correcting your information if the deletion of the Employment-Related

Personal Information does not negatively impact you, or if you consent to the deletion.

### **Instructions for Submitting a Verifiable Request to Know, to Delete or to Correct Your Employment-Related Personal Information Collected, Used, or Disclosed**

To exercise your Right to Know, to Delete, or to Correct you may email us at [privacy@alliantcreditunion.com](mailto:privacy@alliantcreditunion.com). When emailing us, inform us that you would like to submit a California Consumer Privacy Act (CCPA) request, what type of CCPA request (i.e., to know, to delete or to correct) and we will explain the process to you. Please include your name, address and whether you are a job applicant, past or current employee, director or contract of Alliant.

Please note that we are only required to respond to your CCPA request twice within a 12-month period.

Please note that we may deny your CCPA request for a number of different reasons, including for the reasons identified above in the “What is Employment-Related Personal Information” section and in the CCPA.

### **The Process We Use to Verify Your Request to Know, to Delete or to Correct Your Employment-Related Personal Information Collected, Used, or Disclosed**

If you are a job applicant, past or current employee, director, or contractor, we will verify you as follows:

- If you submit a request to know the categories of Employment-Related Personal Information, you will need to provide us with your name, address, date of birth, and Social Security number, which we will process through a third party identity verification service to verify your identity.
- If you submit a request to know specific pieces of Personal Information or to delete or to correct your Employment-Related Personal Information, you will need to provide us with your name, address, date of birth, and Social Security Number, which we will process through a third party identity verification service to verify your identity. You will also be required to submit a signed declaration under penalty of perjury stating that you are the consumer whose Employment-Related Personal Information is requested.

We will generally avoid requesting any additional information from you to verify you. However, if we or the third party identification service cannot verify your identity based on the information we or the third party identification service currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud prevention purposes. We will delete any new Personal Information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA or other applicable law.

Generally, if we are unable to verify your identity, we will inform you and explain why we were unable to do so.

### **Our Response to Your Request to Know, to Delete or to Correct Your Employment-Related Personal Information Collected, Used, or Disclosed**

Once we receive your verifiable consumer request, we will confirm our receipt of your request within 10 business days and provide you with additional information about how we will process the request. Our goal is to respond to your request within 45 calendar days of receiving the request, beginning on the day we receive the request. However, in the event that we need more time (up to 90 calendar days total) to respond to your request, we will provide you with notice and an explanation of the reasons that we will take more than 45 calendar days to respond. Any disclosures we provide will cover the 12-month period preceding our receipt of your request. You may request that we disclose the required information beyond the 12-month period back to January 1, 2022, and we will provide that information unless doing so proves impossible or would involve a disproportionate effort. unless doing so proves impossible or would involve disproportionate effort. If we are unable to comply with a given request, we will provide you with a response explaining why we have not acted on your request and identifying any rights you may have to appeal the decision.

We will not charge you 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. We may refuse to act on your CCPA request if, for example, it is unfounded or excessive, if we cannot verify your identity or the authority of your agent, or because of a conflict with federal or state law, and if so, we will let you know.

## Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights, including an employee's, applicant's, or independent contractor's rights not to be retaliated against.

## Date Our California Privacy Statement was Last Updated

This California Privacy Statement was last updated on 12/31/2023.

## Contacting Us

If you have any questions regarding our privacy policies, our California Privacy Statement, the ways in which we collect, use, and disclose your Employment-Related Personal Information, or how to exercise your rights under the CCPA, please do not hesitate to contact us at:

Email: [privacy@alliantcreditunion.com](mailto:privacy@alliantcreditunion.com)

Phone: 800-328-1935