

California Consumer Privacy Act
Privacy Notice
for Employment Purposes

Last Updated: 01/01/2023

This **Privacy Notice for Employment Purposes** supplements the information contained in Neighbors Bank's Online Privacy Notice (<https://www.neighborsbank.com/privacy/>) and applies solely to all job candidates, employees, former employees, temporary workers, business guests, outsourced staff, contractors, and similarly situated individuals who reside in the State of California ("you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 (CPRA); any terms defined in the CCPA or the CPRA have the same meaning when used in this Notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Lawfully obtained, truthful information that is a matter of public concern
- Deidentified or aggregated consumer information.
- Information excluded from the scope of the CCPA or CPRA, like:
 - 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), the Farm Credit Act, and the Driver's Privacy Protection Act of 1994.

Your Personal Information

We do not sell the personal information or the sensitive personal information we collect. We do not share the personal information or sensitive personal information that we collect with third parties for cross-context behavioral advertising. To opt-out of personal information sales or sharing, visit <https://www.neighborsbank.com/ccpa-inquiry/>.

In particular, in the last twelve months, we may have collected the categories of personal information listed in the tables below for employment-related purposes. For each category, the tables also list our possible use purposes and whether we sell the information or share it with third parties for cross-context behavioral advertising.

| Personal Information Category | Business Purpose | Shared with Third Parties for Cross-Contextual Behavior Advertising or Sold |
|---|--|---|
| <p>Identifiers:</p> <p>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>General human resources administration; ensuring compliance with laws and regulations; providing and managing benefits</p> | <p>No</p> |
| <p>California Customer Records personal information:</p> <p>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, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories</p> | <p>General human resources administration; ensuring compliance with laws and regulations; providing and managing benefits</p> | <p>No</p> |
| <p>Protected classification characteristics under California or federal law:</p> <p>Age (40 years or 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</p> | <p>General human resources administration; complying with state and federal law (e.g anti-discrimination efforts, engaging in the interactive process to provide disability accommodations); providing and managing benefits</p> | <p>No</p> |
| <p>Internet or other similar network activity:</p> <p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement</p> | <p>General human resources management; detecting security incidents; ensuring compliance with laws and regulations</p> | <p>No</p> |
| <p>Sensory or Surveillance Data:</p> <p>Audio, electronic, or visual</p> | <p>Assessing employee performance; protecting company assets; providing</p> | <p>No</p> |

| | | |
|--|---|----|
| | physical security; ensuring compliance with laws and regulations | |
| Geolocation data: Physical location | Troubleshooting and technical support | No |
| Professional or employment-related information: Current or past job history or performance evaluations | General management, assessment, and support of our employees; assessing candidates for employment | No |
| Inferences drawn from other personal information: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes | General management, assessment, and support of our employees; assessing candidates for employment | No |
| Sensitive Personal Information: Social security number, driver's license, state identification card, or passport number; racial or ethnic origin; religious or philosophical beliefs; health-related information; communications that are not directed to us but are executed on our computing systems; and biometric information in the form of voice recordings | General human resources administration; diversity and inclusion initiatives; providing benefits; and complying with state and federal law. Voice recordings are used to assess and improve employee performance | No |

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms or assessments you complete or documents you submit
- Indirectly from you. For example, from observing or recording your interactions with clients
- From third parties or public sources, such as obtaining a lawful background check from a consumer reporting agency or viewing information on a public social media platform like LinkedIn
- From our affiliates.
- From our service providers and contractors, who we engage to further our business purposes.

Use of Personal Information

In addition to the purposes enumerated in the chart above, we may use or disclose the personal information we collect for one or more of the following purposes:

- To perform any services reasonably expected by your request or relationship with us
- General management, assessment, and support of our employees and our business
- Fulfilling our obligations under your employment agreement

- Assessing candidates for employment (including pre-hire assessments, reference checks, and lawful background checks), managing the hiring process, and onboarding new employees
- Performing periodic, lawful background checks on employees
- Communicating with you regarding your employment, contracted work, or employment opportunities
- Administering payroll
- Administering benefits to you and your dependents
- Arranging travel and events
- Completing internal investigations, when necessary
- Providing physical security, protecting the life and safety of employees and others, and protecting company assets
- Complying with laws and regulations (e.g. minimum wage, tax, anti-discrimination laws, mortgage industry regulations, et cetera) and complying with court orders and audit requests
- Responding to law enforcement requests and defending against or pursuing claims, disputes, or litigation – in court, via arbitration, or elsewhere
- Licensing employees when required to conduct business
- Managing our network and information systems
- Analyzing and improving our processes
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred
- As described to you when collecting your personal information or as otherwise set forth in the CCPA

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Use of Sensitive Personal Information

In addition to the purposes enumerated in the chart above, we may use or disclose the sensitive personal information we collect for one or more of the following purposes, provided that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose:

- To perform the services reasonably expected by your request or relationship with us
- General management, assessment, and support of our employees and our business
- Assessing candidates for employment (including pre-hire assessments, reference checks, and lawful background checks), managing the hiring process, and onboarding new employees
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions
- To ensure the physical safety of natural persons
- Defending against or pursuing claims, disputes, or litigation – in court, via arbitration, or elsewhere
- To verify or maintain the quality or safety of a service, that is owned, or controlled by us, and to improve, upgrade, or enhance the service that is owned, or controlled by us

- Complying with laws and regulations (e.g. minimum wage, tax, anti-discrimination laws, mortgage industry regulations, et cetera) and complying with court orders, law enforcement requests, and audit requests
- For purposes that do not infer characteristics about you

We will not collect additional categories of sensitive personal information or use the sensitive personal information we have collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosing Personal Information and Sensitive Personal Information

We may disclose your personal information and sensitive personal information to a service provider or contractor for a business purpose, subject to your right to opt-out of those. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract or as otherwise permitted by you. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We may disclose your personal information with the following:

- Service providers
- Contractors
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we and/or third parties provide to you
- Law enforcement and other third parties in connection with legal requests

Data Retention

We store your personal information for different lengths of time depending on the category of personal information and the purpose for its collection and use. We will retain your data for as long as needed, or permitted, based on the reason why we obtained it. We will not retain personal information for longer than is reasonable necessary for any disclosed purposes. This means we may retain your personal information even if you are not hired or your employment relationship with us ends. Some information may be deleted automatically based on specific schedules. Other information (e.g., contact information) may be retained for a longer period of time. Finally, we may further retain information for business purposes based on our legitimate business interests or legal purposes, such as network improvement, fraud prevention, record-keeping, or enforcing our legal rights or defending legal claims.

When deciding how long to keep your information, we consider criteria, such as:

- The duration, and nature, of any relationship with you or service that we have provided to you;
- Our consideration of you for other current and future employment opportunities;
- Whether we are subject to any legal obligations (e.g., any laws that require us to keep transaction records for a certain period of time before we can delete them); or

- Whether we have taken any legal positions (e.g., in connection with any statutes of limitation or in response to any legal hold or regulatory requests) or if we need information

Rather than delete your data, we may de-identify it by removing identifying details.

Sales of Personal Information

In the preceding twelve (12) months, we have not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

California residents who are interested in the information we collect for business purposes unrelated to employment or human resources should <https://www.neighborsbank.com/privacy/>.

Right to Know Request - Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose the categories of information we shared.

Information we collect or share in our role as a financial institution may not be included in your Right to Know response.

We do not provide these access and data portability rights for B2B personal information.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Continue the employment relationship.

2. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
3. Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
4. Debug products to identify and repair errors that impair existing intended functionality.
5. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
6. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
7. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
8. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
9. Comply with a legal obligation.

We do not provide these deletion rights for B2B personal information.

Right to Correct Inaccurate Information

You have the right to request that we correct any inaccurate personal information that we maintain about you. Once we receive and confirm your verifiable consumer request, we will use commercially reasonable efforts to correct the inaccurate personal information as directed by you. In responding to your request, we will take into account the nature of the personal information and the purposes of the processing of the personal information.

Right to Restrict Sensitive Personal Information Processing

You have the right to request that we limit our use and disclosure of the sensitive personal information that we have collected about you. Subject to certain exceptions, once we receive and confirm your verifiable consumer request, we will:

- Cease to use and disclose your sensitive personal information for purposes other than those disclosed above, in the section titled "Use of Sensitive Personal Information"
- Notify our service providers or contractors that use your sensitive personal information of your request to limit and instruct them to comply with your request in the same timeframe.

Exercising California Consumer Rights Requests

To exercise the access, data portability, correction, opt-out, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (855) 849-2144.
- Visiting <https://www.neighborsbank.com/ccpa-inquiry/>.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

We will deliver our written response by email to the primary email address that you submit with your request.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee 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.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.

- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will update the notice's effective date and post the updated notice on our Careers webpages and on our Workday homepage, or on the main page of an equivalent internal human resources management system. **Your continued employment or interaction with us for employment purposes following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described below and in our Privacy Policies, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (855) 849-2144

Websites: <https://www.neighborsbank.com/privacy/>

Postal Addresses:

Neighbors Bank
Attn: Neighbors Bank Customer Service
1801 Westfall Drive
Columbia, MO 65202

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