



## **Golden 1 Credit Union CCPA Privacy Notice for California Candidates, Contractors, and Employees**

**Last Updated: January 1, 2023**

Golden 1 Credit Union ("Golden 1") has adopted this Candidate, Contractor, and Employee Privacy Notice to comply with the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, "CCPA"). This notice provides job candidates, contractors, and employees with a description of our online and offline practices regarding the collection, use, disclosure, sale, sharing, and retention of personal information and sensitive personal information. Any terms defined in the CCPA have the same meaning when used in this notice. This notice does not apply to Golden 1's processing of personal information in connection with the use of our products and services by California Residents. For more information on that processing, please see Golden 1's [CCPA Privacy Notice for California Residents](#).

### **What Personal Information is Covered by this Notice?**

Personal information includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular candidate, contractor, or employee. Certain personal information may be exempt from the CCPA if it is governed by other federal or state law. For example, the CCPA does not apply to health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the California Confidentiality of Medical Information Act (CMIA), or the Fair Credit Reporting Act (FCRA). Personal information for the purposes of CCPA does not include publicly available information from government records or de-identified or aggregate information. This notice only addresses Golden 1's collection and use of personal information that is not exempt from the CCPA and is not covered by our separate CCPA Privacy Notice for California Residents provided above.

### **Information We Collect and Use**

We have collected the categories of personal information and sensitive personal information listed below in regard to candidates, contractors, and employees within the last 12 months. This table also lists, for each category, the business purposes for the information collection and whether we disclose the information for our business or employment purposes and/or sell or share it with third parties for cross-context behavioral advertising.

Category of Personal Information Collected	How We Use It (Business Purpose(s) for Collection)	Disclosed/Sold/ Shared
<b>Identifiers</b> , such as a real name, alias, postal address, employer business names, employer business addresses, unique personal identifiers, online identifier, internet protocol address, email address, social security number, driver's license number, passport number, or other similar identifiers	<p>Considering your candidacy for employment.</p> <p>Verifying your employment eligibility.</p> <p>Analyzing our recruitment and hiring process.</p> <p>Administering payroll and benefits.</p> <p>Administering training and meeting registration.</p> <p>Managing your employment relationship with us.</p> <p>Reaching you regarding your employment or application process.</p> <p>Completing background checks.</p> <p>Conducting surveys</p>	<p>Disclosed to service providers for the stated business purposes, and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>
<b>Personal information categories listed in California Civil Code 1798.80(e)</b> , such as a name, signature, social security number, address, telephone number, passport number, driver's license number or state identification card number, tax id, insurance policy number, education, employment, employment history, financial information, medical information, or health insurance information	<p>Considering your candidacy for employment.</p> <p>Verifying your employment eligibility.</p> <p>Analyzing our recruitment and hiring processes.</p> <p>Administering payroll and benefits.</p> <p>Managing your employment relationship with us.</p> <p>Reaching you regarding your application process.</p>	<p>Disclosed to service providers and affiliates for the stated business purposes, and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>

	To comply with applicable laws and regulations.	
<b>Protected classification characteristics under California or federal law</b> , such as age, race, color, ethnicity, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.	<p>Verifying your employment eligibility.</p> <p>Analyzing our recruitment and hiring process.</p> <p>Complying with employment laws and regulations.</p>	<p>Disclosed to service providers and affiliates for the stated business purposes, and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>
<b>Internet or other similar network activity</b> , such as browsing history, search history, or information on your interaction with a website.	<p>Managing your employment relationship with us.</p> <p>Maintaining security.</p>	Not disclosed, sold, or shared.
<b>Geolocation data</b> , such as physical location or movements.	<p>Managing your employment relationship with us.</p> <p>Maintaining security.</p>	Not disclosed, sold, or shared.
<b>Sensory data</b> , such as audio, electronic, visual, or similar information	<p>Managing your employment relationship with us.</p> <p>Maintaining security.</p>	<p>Disclosed to service providers for the stated business purposes and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>

<p><b>Professional or employment related information</b>, such as current or past job history, title, position, employee identifiers, compensation and benefits information, and personnel records.</p>	<p>Considering your candidacy for employment.</p> <p>Verifying your employment.</p> <p>Managing your employment relationship with us.</p> <p>Administering payroll and benefits.</p> <p>Administer and address health, safety, and accommodation needs.</p> <p>Address work related illnesses or injuries.</p>	<p>Disclosed to service providers and affiliates for the stated business purposes, and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>
<p><b>Educational Information</b>, such as educational records, schools attended and/or degrees obtained, grades, transcripts, certificates obtained, professional qualifications and memberships, professional trainings, and company internal trainings.</p>	<p>Considering your candidacy for employment.</p> <p>Verifying your qualifications.</p> <p>Managing your employment relationship with us.</p>	<p>Disclosed to service providers to determine Bondability and eligibility for hire.</p> <p>Not sold or shared.</p>
<p><b>Inferences drawn from other personal information</b>, such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior attitudes, intelligence, abilities, and aptitudes.</p>	<p>Considering your candidacy for employment.</p> <p>Assessing your qualifications and fitness for the job.</p> <p>HR recordkeeping that may include information on promotions, and discipline.</p> <p>Managing your employment relationship with us.</p>	<p>Not disclosed, sold, or shared.</p>

<b>Sensitive personal information</b>	See separate table below.	See separate table below.
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<b>Category of Sensitive Personal Information Collected</b>	<b>How we Use It (Business Purpose(s) for Collection)</b>	<b>Disclosed/Sold/Shared</b>
<b>Government identifiers</b> , such as social security number, driver's license number, state identification card, passport numbers or other similar identifiers.	<p>Considering your candidacy for employment.</p> <p>Verifying your identity.</p> <p>Verifying your employment eligibility.</p> <p>Completing your employment background check.</p> <p>Complying with applicable laws and regulations.</p>	<p>Disclosed to service providers for stated business purposes, and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>
<b>Precise geolocation</b> , such as employee badging and VPN.	<p>Managing your employment relationship with us.</p> <p>Maintaining security.</p>	Not disclosed, sold, or shared.
<b>Racial and ethnic origin</b>	Complying with applicable employment laws.	Not disclosed, sold, or shared.
<b>Private communications</b> , such as the contents of email, teams chat, and texts messages unless we are the intended recipient.	<p>Managing your employment relationship with us.</p> <p>Maintaining security.</p>	<p>Disclosed to service providers for the stated business purposes, and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>
<b>Health information</b> , such as information regarding physical and/or mental health.	<p>Administering employee benefits.</p> <p>Complying with applicable laws and regulations.</p> <p>Administering and addressing health, safety, and accommodation needs.</p>	<p>Disclosed to service providers and affiliates for the stated business purposes, and to other third parties as needed to comply with legal obligations.</p> <p>Not sold or shared.</p>

	Addressing work-related illnesses or injuries.	
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We obtain the personal information and sensitive personal information listed above from the following categories of sources:

- Directly from you, such as when you provide information to apply for an open position, or complete forms during employee onboarding.
- Indirectly from you, such as from observing your interactions on our website, systems, or at our branches or corporate office, or when you provide references or qualifications.
- Third-party business partners, such as joint marketing partners, analytics providers, background check providers, and verification services.
- Outside companies or organizations from whom we collect Personal Information to support human resource and workforce management activities. Examples may include operating systems, platforms, and social networks.

#### **Disclosure, Sale, or Sharing of Personal Information**

Golden 1 may disclose your personal information, including sensitive personal information, to our service providers and other third parties for business purposes. When we disclose your personal information to a service provider for a business purpose, we enter a contract that describes the purpose and requires the recipient to keep that information confidential and not use it for any purpose except performing the contract. Within the preceding 12 months, we have shared personal information and sensitive personal information with service providers and other third parties for business purposes identified in the chart above. We will not use or disclose your personal information or sensitive personal information for other purposes than those outlined in this notice.

Within the preceding 12 months, Golden 1 has not sold personal information or sensitive personal information, including personal information of minors under the age of 16, to any third parties or shared it with third parties for cross-context behavioral advertising.

#### **Retention of Personal Information**

Golden 1 will retain personal information, including sensitive personal information, for as long as it is required to do so by applicable law(s) or for as long as necessary for the purpose(s) of use and processing listed in the chart above, whichever is longer (“the retention period”). Golden 1 will delete personal information after the applicable retention period.

The criteria used to determine our retention periods include:

- Whether we have an ongoing relationship with the Candidate, Contractor, or Employee;
- As required by legal obligations to which we are subject;

- As advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations);
- The time period necessary to achieve the purpose of use and processing.

### **Your Rights and Choices**

The CCPA provides candidates, contractors, and employees with specific rights regarding their information. This section describes your rights and explains how to exercise them.

#### **Right to Know and Access**

You have the right to request that Golden 1 disclose certain information to you about our collection and use of your personal information, including sensitive personal information, over the past 12 months. Once we receive and confirm your verifiable request, and confirm the information you seek is covered by the CCPA, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information was collected;
- Our business purpose for collecting, selling, or sharing that personal information;
- The categories of third parties (if any) to whom we sold or shared that personal information, and the categories of personal information that were sold or shared; and
- The specific pieces of personal information we collected about you.

#### **Right to Delete**

You have the right to request that Golden 1 delete any of your personal information, including sensitive personal information, that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable requests and confirm the information you request to be deleted is covered by CCPA, we will delete (and direct any service providers or contractors to whom we disclosed the information 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, our service provider(s) or contractor(s) to maintain the personal information in order to:

- Complete the transaction for which the personal information was collected, provide a service you requested, take actions reasonably anticipated within the context of our ongoing relationship with you, or otherwise perform our contract with you;
- Provide a product or service requested by the consumer (including employees);
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug to identify and repair errors that impair existing intended functionality;

- Exercise free speech, ensure the right of another consumer (including employees) to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed research in the public interest;
- Enable solely internal uses that are reasonably aligned with the consumers (including employee's) expectations based on your relationship with us;
- Comply with a legal obligation, including applicable federal and state employment laws; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Right to Correct Inaccurate Information**

You have the right to request that Golden 1 correct any inaccurate personal information, including sensitive personal information, that we collected from you and retained, considering the nature of the personal information and the purpose of processing the information, subject to certain exemptions. Once we receive and confirm your verifiable request and confirm the information you requested to be corrected by the CCPA, we will correct (and will direct any service providers or contractors to whom we disclose the information to correct) your personal information, unless an exception applies.

We may deny your request to correct if we determine that the contested personal information is more likely than not accurate based on the totality of circumstances, or if it's reasonably necessary for us to maintain the personal information for one of the reasons outlined above (under "Right to Delete").

### **Exercising Your Rights**

To exercise the rights described above, please submit a verifiable request to us by:

- Calling us at 1-877-GOLDEN 1 (1-877-465-3361);
- Visiting [www.golden1.com/terms-and-conditions/california-consumer-privacy-policy-to-complete-and-submit-the-CCPA-Request-Form](http://www.golden1.com/terms-and-conditions/california-consumer-privacy-policy-to-complete-and-submit-the-CCPA-Request-Form);
- Visiting a Golden 1 branch to complete and submit a request form

Only you or an authorized agent may make a verifiable request related to your personal information.

- When an authorized agent submits a request on your behalf, we may require proof that you gave the agent signed permission to submit the request, such as a power of attorney or other signed authorization.



- If your agent does not have a valid power of attorney, we may also require that you verify your identity directly with us and confirm directly with us that you provided the agent permission to submit the request on your behalf.

We may deny your request if we are unable to verify your identity or, in the case of a request submitted on your behalf, if we cannot verify that the agent has the authority to make the request.

You may make a verifiable request to know twice within a 12-month period. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collect personal information or an authorized representative; and
- Describe your request within 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 the authority of your agent to make the request (if applicable) and confirm the personal information relates to you. Making a verifiable request does not require you to create an account with us. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

### **Response Timing and Format**

We will attempt to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you in writing of the reason and extension period. The response we provide will also explain the reason(s) we cannot comply with a request, if applicable. We do not charge to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a monetary charge, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Right to No Retaliation Following Exercise of Rights**

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

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

- Suggest that you may receive a different price or rate for products or services or a different level or quality of products and services.
- Retaliate against an employee, applicant for employment, or independent contractor for exercising their rights under CCPA.

We may offer you certain financial incentives permitted by the CCPA, such as the opportunity to participate in a focus group for compensation. Any CCPA-permitted financial incentives we offer will reasonably relate to the value of our personal information and contain written terms that describe the program's material aspects, which we will provide to you at the time we offer the incentive. Participation in a financial incentive requires your opt-in consent, which you may revoke at any time.

### **Changes to Our CCPA Privacy Notice**

Golden 1 reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated Notice on our intranet and the Careers page of our Website and update the notice's effective date. **Your continued contract, candidacy, or employment and/or use of our facilities following 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 Golden 1 collects and uses your information, or your choices and rights regarding such use, or wish to make a CCPA request, please do not hesitate to contact us by:

- **Calling us at 1-877-Golden 1 (1-877-465-3361);**
- **Visiting [www.golden1.com/terms-and-conditions/california-consumer-privacy-policy](http://www.golden1.com/terms-and-conditions/california-consumer-privacy-policy); or**
- **Visiting a Golden 1 branch**

If you have a disability that makes it difficult to contact us at the above toll-free number to access the notice in an alternative format. If you wish to print a copy of this policy, it is available as a searchable pdf document [here](#).