

Veterans United Home Loans
California Consumer Privacy Act Notice
for Employees, External Staff, and Candidates

Effective Date: 01/01/2020

This **Privacy Notice for Employees, External Staff, and Candidates who are California Residents** supplements the information contained in Veterans United's Online Privacy Notice <https://www.veteransunited.com/privacy/> and applies solely to all job candidates, employees, temporary workers, business guests, outsourced staff, contractors, and similarly situated individuals who reside in the State of California ("you"). To view the general California Consumer Privacy Act Notice for Veterans United, visit <https://www.veteransunited.com/privacy/>.

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA 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 individual, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, 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), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from individuals for employment purposes within the last twelve (12) months unless marked "not collected":

Category	Examples	Collected? If Collected, Business Purpose
A. Identifiers.	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.	General human resources administration, including the uses provided in the "Use of Personal Information" section below
B. Personal information categories listed in the California Customer Records	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,	General human resources administration, including the uses provided in the "Use of Personal Information" section below

statute (Cal. Civ. Code § 1798.80(e)).	employment, employment history, bank account number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	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, genetic information (including familial genetic information).	Complying with state and federal law (e.g anti-discrimination efforts, engaging in the interactive process to provide disability accommodations, etc.); providing and managing benefits
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NOT COLLECTED.
E. Biometric Information	Fingerprints.	Performing a background check as part of licensing employees when required to conduct business
F. Internet or other similar network activity.	Browsing history and search history.	General human resources management; detecting security incidents; ensuring compliance with laws and regulations
G. Geolocation data.	Physical location or movements.	NOT COLLECTED.
H. Sensory or Surveillance Data	Audio, electronic, visual.	Assessing employee performance; protecting company assets; providing physical security; ensuring compliance with laws and regulations
I. 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
J. Non-public education	Education records directly related to a student maintained by an educational	NOT COLLECTED.

information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	
K. 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

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

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- 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 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.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose, subject to your right to opt-out. 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.

We share your personal information with the following categories of third parties:

- Our affiliated entities.
- Service providers. Examples: recruitment service providers (including online recruitment platforms), pre-employment screening service providers, insurance or benefits providers we've contracted with, human resource management systems
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with benefits or services we and/or third parties provide to you.

Sales of Personal Information

In the preceding twelve (12) months, Veterans United has 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.

Please note that until January 1, 2021, personal information collected for employment purposes and used for the purpose(s) it was collected is generally excluded from the following.

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 business-to-business (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. 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for business-to-business (B2B) personal information.

Exercising Right to Know and Deletion Rights Requests

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

- Calling us at 855-857-3933.

- Visiting www.VeteransUnited.com/privacy/.
- For Right to Know Requests: <https://www.veteransunited.com/ccpa-request/?type=ccpa-inquiry>.
- For Deletion Rights Requests: <https://www.veteransunited.com/ccpa-request/?type=ccpa-delete>.

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.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

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 page and on the UltiPro 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 Veterans United collects and uses 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: 855-857-3933

Website: www.VeteransUnited.com/privacy/

Postal Address:

Veterans United Home Loans

Attn: VUHL Customer Service

1400 Veterans United Drive

Columbia, MO 65203