

## California Job Applicant Privacy Notice

Effective Date: March 26, 2024

SIB and its Divisions (“**SIB**,” “**us**,” “**we**,” or “**our**”) provide this California Job Applicant Privacy Notice (“**Notice**”) pursuant to the California Consumer Privacy Act (the “**CCPA**”) in order to explain our practices regarding Personal Information we collect through our job application process.

### **Collection and Use of Personal Information**

As used in this Notice, the term “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

Generally, we collect the following categories of Personal Information about job applicants.

Category of Personal Information	Purposes for Collection
<p><b>Identifiers and personal records</b>, including real name, alias, postal address, telephone number, unique personal identifier, online identifier, IP address, email address, signature, or other similar identifiers, education, employment, and employment history. <i>This category includes information described in Cal. Civ. Code § 1798.80(e).</i></p> <p><b>Professional or employment-related information</b>, including skills, qualifications, work experience, references, recommendations, languages spoken, and other information included in a resume, CV, application form, or cover letter; answers to behavioral or other screening questions in an application or interview; information contained in any personal webpages or documents you choose to share with us; information relating to professional licenses, training, disciplinary actions, and membership in professional organizations; background checks; work authorization information; information relating to membership in civic organizations; compensation preferences and requirements.</p>	<p>To open and maintain your application records</p> <p>To assess your qualification for employment</p> <p>To communicate with you</p> <p>To analyze trends, usage, and activity relating to our recruiting and websites</p> <p>To meet legal, compliance, and recordkeeping requirements</p> <p>Quality assurance, auditing, security, fraud prevention, and debugging</p>
<p><b>Characteristics of protected classifications</b> under California or federal law, including, race, ancestry, ethnic origin, citizenship or immigration status, sex, gender, sexual orientation, gender identity, religion or creed, military or veteran status, medical condition, disability status, and marital status. <i>The following are classified as Sensitive Personal Information under the CCPA: racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or sexual orientation.</i></p>	<p>To meet legal, compliance, and recordkeeping requirements</p>
<p><b>Commercial information</b>, including records of products or services purchased</p>	<p>For expense reimbursements (e.g., if you travel for an interview)</p>
<p><b>Internet or other electronic network activity information</b></p> <p><b>Geolocation data</b> based on your IP address</p>	<p>To communicate with you</p> <p>To operate our websites, including tailoring our content and your online experience</p>

Category of Personal Information	Purposes for Collection
	<p>To improve our websites, set default options, and provide you with a better application experience</p> <p>To analyze trends, usage, and activity relating to our recruiting and websites</p> <p>To meet legal, compliance, and recordkeeping requirements</p> <p>Quality assurance, auditing, security, fraud prevention, and debugging</p>
<b>Audiovisual information</b>	<p>To communicate with you</p> <p>Quality assurance, auditing, security, fraud prevention, and debugging</p>
<b>Inferences</b> reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	<p>To assess your qualification for employment</p> <p>To analyze trends, usage, and activity relating to our recruiting and websites</p> <p>Quality assurance, auditing, security, fraud prevention, and debugging</p>

We may also collect, use, and disclose Personal Information as required by law, regulation, or court order; to respond to governmental and/or law enforcement requests; to identify, contact, or bring legal action against someone who may be causing injury to or interfering with our or others' rights or property; to support any actual or threatened claim, defense, or declaration in a case or before any judicial and/or administrative authority, arbitration, or mediation panel; or for other purposes described in any other privacy notice or with your consent. Additionally, we may use and disclose Personal Information to third parties in connection with a sale, assignment, merger, reorganization, or other corporate transaction relating to all or part of our business.

**Sources of Personal Information**

Generally, we collect the categories of Personal Information described above from the following categories of sources:

- **Directly from you.** For example, during the application process and throughout your interactions with us, including through forms and processes where you submit information to us
- **From our service providers.** For example, from human resources and information technology vendors, background check agencies, and other service providers
- **Created by us.**
- **Automatically.** For example, when you use our websites, or through security cameras at some of our offices
- **From other sources.** For example, professional recruiters, your references, business colleagues who may refer you to us, from educational institutions, and other third parties that may provide information relevant to your application

## **Disclosures of Personal Information**

We may disclose each of the categories of Personal Information we collect to our service providers and contractors for the following business purposes:

- Performing services (including processing, maintaining, or collecting Personal Information) on our behalf (e.g., providing communications, technical, analytical, web hosting, cloud hosting and application support, among other services)
- Ensuring security and integrity of Personal Information
- Debugging to identify and repair errors that impair existing intended functionality
- Providing advertising or marketing services on our behalf
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of our services
- To comply with applicable laws and regulations
- For safety and security
- Detecting, protecting against, or addressing malicious, deceptive, fraudulent, or illegal activity

We disclose Sensitive Personal Information for more limited purposes, including: when necessary to provide our services; services performed on our behalf related to the operation of our business and/or the recruiting process; to comply with applicable laws and regulations; for safety and security; detecting, protecting against, or addressing malicious, deceptive, fraudulent, or illegal activity.

We do not sell Personal Information collected through our job application process or share it for cross-context behavioral advertising.

## **How Long We Keep Personal Information**

We keep the categories of Personal Information described above for as long as necessary for the purposes described in this Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected
- The Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case)
- We are otherwise required or permitted to keep Personal Information by applicable laws or regulations

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

## **Submitting Requests Relating to Your Personal Information**

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request through our [webform](#) or call us at (800) 576-7806. Please note that if you submit a request, you will be asked to provide 2-3 pieces of Personal Information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be

processed. An authorized agent may submit a request on your behalf using our webform or toll-free number.

**Right to Know.** California residents have the right to request more information regarding the following:

- The categories of Personal Information we have collected about you, including:
  - The categories of sources from which the Personal Information was collected
  - Our business or commercial purposes for collecting or disclosing Personal Information
  - The categories of recipients to which we disclose Personal Information
  - The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information
- The specific pieces of Personal Information we have collected about you

**Right to Request Deletion of Personal Information.** California residents have the right to request the deletion of Personal Information we collected from you, subject to certain exceptions. Where we use deidentification to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not attempt to reidentify the information.

**Right to Correct Inaccurate Personal Information.** If you believe that Personal Information we maintain about you is inaccurate, you may submit a request for us to correct that information. Upon receipt of a verifiable request to correct inaccurate Personal Information, we will use commercially reasonable efforts to correct the information as you direct.

**Right to Limit Use and Disclosure of Sensitive Personal Information.** We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us, including retaliation against you as an applicant.

### **How to Contact Us**

If you have any questions about how we handle your Personal Information, please contact us through our [webform](#) or call us at (800) 576-7806.