

NOTICE AT COLLECTION OF PERSONAL INFORMATION

Langley Federal Credit Union (together with its subsidiaries and affiliates, also referred to as “we,” “us,” or “our” herein) is providing this notice pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). Any terms defined in the CCPA have the same meaning when used in this notice. This notice provides a summary of how we collect, use and share your personal information.

Application of this Notice

This notice applies to natural residents of the State of California from whom we collect personal information in the course of their acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of Langley Federal Credit Union.

Below are the categories of personal information we collect and the purposes for which we intend to use this information.

Categories Information We Collect

We will collect the following categories of personal information (which may overlap):

- Identifiers, such as name and government-issued identifier (e.g., Social Security Number).
- Personal information, as defined by Cal. Civ. Code § 1798.80, such as contact information or financial information.
- Certain protected characteristics, such as sex and marital status.
- Commercial information, such as transaction information and purchase history.
- Internet or network activity information, such as browsing history and interactions with our website, applications, and emails.
- Geolocation data, such as device location and Internet Protocol (IP) location.
- Audio, electronic, visual, and similar sensory data, such as call and video recordings.
- Biometric information, such as fingerprints.
- Professional and employment-related information, such as work history and prior employer.
- Non-public education information, such as college transcripts.
- Sensitive personal information, such as Social Security Number and driver’s license numbers.

Personal information for purposes of the CCPA does not include:

- Publicly available information.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like personal information covered by certain financial sector laws, such as the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA).

Use of Personal Information

We may use or disclose the personal information we collect to:

- To comply with all applicable laws and regulations.
- Recruit and evaluate job applicants and candidates for employment.
- Conduct background checks.
- Manage your employment relationship with us, including for:

- Onboarding processes;
 - Timekeeping, payroll, and expense report administration;
 - Employee benefits administration;
 - Employee training and development requirements;
 - The creation, maintenance, and security of your online employee accounts;
 - Reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
 - Worker's compensation claims management;
 - Employee job performance, including goals and performance reviewed, promotions, discipline, and termination; and
 - Other human resources purposes.
- Manage and monitor employee access to company facilities, equipment, and systems.
 - Conduct internal audits and workplace investigations.
 - Investigate and enforce compliance with and potential breaches of our policies and procedures.
 - Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions.
 - To prevent, detect and investigate security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.
 - Maintain commercial insurance policies and coverages, including for worker's compensation and other liability insurance.
 - Perform workforce analytics, data analytics, and benchmarking.
 - As necessary or appropriate to protect the rights, property or safety of us, consumers or others.
 - To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
 - Exercise or defend our legal rights and that of our employees, affiliates, customers, contractors, and agents.
 - For client marketing purposes.

We will not sell your personal information, and we will not share your personal information for cross-context behavioral advertising purposes.

Retention of Personal Information

The criteria we will use to determine the period of time that we will retain the categories personal information described above depends on our relationship with you and on the following criteria:

- **Laws and regulations.** We are a regulated financial institution that is subject to laws and regulations governing our retention of personal information of our members, applicants for credit union membership, loans and other financial products and services. We are also an employer and, thus, we are subject to labor laws governing how long we must retain information about applicants for employment and current and former employees. Therefore, applicable laws and regulations will govern how long we retain your personal information.
- **Contracts.** We must also retain information for as long as necessary to comply with our contractual duty to you as well as our contractual obligations with our service providers, contractors and other third parties.
- **Assert and defend against legal actions.** We may retain your personal information for such period as we may need to assert and defend against potential legal actions.

Contact Information

If you have any questions or comments about this notice, please do not hesitate to contact us at: 1-800-826-7490. Please visit our CCPA Notice on our website <https://www.langleyfcu.org/> for more information about the ways in which we collect and use your personal information and your choices and rights regarding such use under California law.