

Privacy Notice at Collection (CCPA/CPRA) for California Employees

1. **About this Notice.** This privacy notice sets out how CardWorks, Inc. and its subsidiaries collect and use personal information about you in compliance with our obligations under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). This Notice supplements the CardWorks Employee Handbook.

We take the privacy of our employees very seriously. Please read this notice carefully as it contains important information on the personal information that we collect, why we collect it, how long we keep it, and whether it is sold to or shared with third parties. This notice will be updated regularly. The day the last update was performed is provided at the top of this document for your reference.

2. **Key Terms.** The following key terms are used in this notice:

- **We, us, our.** CardWorks, Inc. and its subsidiaries (CardWorks Servicing, Carson Smithfield, Merrick Bank).
- **Personal information.** Any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular individual.
- **Sensitive personal information.** Personal information revealing an individual's social security number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, and citizenship or immigration status.
- **Biometric Information.** An individual's physiological, biological, or behavioral characteristics, including information pertaining to an individual's deoxyribonucleic acid (DNA), that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

Other terms used but not defined will have the meaning set forth in the CCPA, as amended by the CPRA, Cal. Civ. Code §§ 1798.100—1798.199.100, and accompanying regulations set forth under Cal. Code Regs. tit. 11, § 7000 et seq.

3. **Personal Information We Collect About You.** We may collect and use the following categories of personal information about you:

Categories of Personal Information Collected

- **Identifiers:** 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.

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- Personal information as defined in Customer Records law: Name, signature, social security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment history, bank account number, other financial information, health insurance information.
- Characteristics of protected classifications under California or federal law (such as race, religion, national origin, age, sex, sexual orientation, pregnancy, familial status, disability, military or veteran status).
- Internet or other electronic network activity information such as browsing history, search history, and information regarding your interaction with internet web sites and applications.
- Audio, electronic, visual, or similar information such as photographs and call recordings.
- Professional or employment-related information such as work history, prior employer, references, qualifications, skills and experience, human resources data, emergency contact information, and data necessary for benefits and related administrative services.
- Personal information revealing an individual's social security number, driver's license and passport numbers, racial background, beneficiary information, and citizenship or immigration status.
- Pre-employment information such as resumes, employment applications, references, background checks, consumer reports, credit checks, social media profiles and history.
- Documentation provided for sick leave, vacation, paid time off, FMLA leave, USERRA leave, or maternity/paternity leave.
- Non-exempt employee benefit plan data.
- Employee's online activity on a work computer/system, such as browsing history, search history, and interactions with the employer's and other web sites and applications.
- Employee professional certifications, or memberships in professional organizations.

4. How and Why We Use Your Personal Information. We use your personal information for the following purposes:

Purposes for Collecting and Using Your Personal Information

Managing Human Resource Functions:

- Workforce planning
- Recruiting, hiring, and onboarding
- Performing background or credit checks
- Implementing diversity and inclusion initiatives
- Increasing employee engagement
- Training and career development
- Assessing performance
- Determining promotions, transfers, salary, awards, and bonuses

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- Managing disciplinary matters
 - Managing payroll and business expenses
 - Administering leave requests
 - Employee communications
 - Administration of benefits
 - Promoting employee health and safety
- Conducting business operations:
- Budgeting
 - Recordkeeping and reporting requirements
 - Managing infrastructure and company assets
 - Strategic planning
 - Maintaining security
 - Emergency response and business continuity
 - Conducting audits
 - Pursuing or defending legal or administrative claims
- Monitoring:
- Compliance with internal policies and procedures
 - Use of company resources
 - Any other monitoring activities permitted by applicable laws
- Compliance with:
- Legal and regulatory obligations
 - Court or other government directives
 - Internal policies and procedures
- Investigating:
- Reports of wrongdoing
 - Policy violations
 - Internal complaints

5. Whether Personal Information Will Be Sold or Shared. We do not sell or share the personal information of employees.

6. How Long Your Personal Information Will Be Kept.

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We will not retain your personal information for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal information. For details on retention periods, see the CWS Record Data Retention, Retrieval & Disposal Policy.

7. **Contact.** If you have any questions or concerns about this notice or the information we collect about you, please contact Employee Relations at employeerelations@cardworks.com.