

California Resident’s Employee Notice at Collection and Privacy Policy

Updated June 23, 2023

Privacy Statement

In compliance with the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”), this California Resident’s Employee Notice at Collection and Privacy Policy (“Employee Privacy Notice”), describes the Personal Information (as defined below) we may collect from you. This Employee Privacy Notice applies only to residents of the state of California who have accepted an offer of employment from Premia Mortgage, LLC, dba Premia Relocation Mortgage (collectively “Premia Mortgage, LLC”, “we,” “us,” or “our”) or who are otherwise an employee, former employee, owner, director, officer, or a contractor of Premia Mortgage, LLC.

We adopt this Policy to comply with the applicable California Privacy laws. The terms found in the CCPA have the same definition and meaning for purposes of this California Employee Privacy Notice. For additional information about our other policies, our Privacy Center, offers links to our [Online and Mobile Privacy Policy](#) and the [Gramm Leach Bliley Act Notice \(“GLBA”\)](#) which are applicable to all visitors, users, and individuals we interact with in the course of our business relationships, including with our commercial clients or other third parties, service providers, or contractors. For Job Applicants in the state of California, our Privacy Center also provides a link to the policy for California Job Applicants.

What is Personal Information?

For purposes of this Employee Privacy Notice, “Personal Information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person who resides in California.

What is Not Considered Personal Information?

While Personal Information is broadly defined, other categories are specifically excluded from this definition including:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern.
 - For the purposes of this Employee Privacy Notice “publicly available” means:
 - information that is lawfully made available from federal, state, or local government records;
 - information that we have a reasonable basis to believe is lawfully made available to the general public by you or from widely distributed media, or by you; and/or
 - information made available by a person to whom you have disclosed the information, so long as you have not restricted the information to a specific audience.
- Personal Information does not include information that is Deidentified or Aggregated as those terms are defined under the CCPA.

Personal Information We Collect and Our Purpose for Collection

We are required to collect Personal Information about you, your dependents, beneficiaries, and emergency contacts, to provide and administer payroll, medical and financial benefits, human resource services, and assistance. Throughout the duration of your employment, we may actively or passively collect the information described in the chart below for the listed purposes.

We collect this information from you and from a variety of sources, which may include online job platforms and social networks, government entities, data analytics providers, data brokers and background check providers, and recruiting firms.

| Category | Personal Information We Collect | Purpose(s) for Collection |
|-------------|---|--|
| Identifiers | Name, signature, social security number, address, telephone number, passport number, driver’s license or state ID number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information you provide to us, medical information, or health insurance information. | We may use this Personal Information to: <ul style="list-style-type: none">• evaluate your qualifications for ongoing employment or promotions,• conduct conflicts checks,• arrange and manage our sponsored job fairs and recruiting events,• create a talent pool for future job opening,• comply with our recordkeeping obligations and policies, |

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| | | <ul style="list-style-type: none">• demonstrate your agreement to, or acceptance of documents presented, or acceptance of documents presented to you,• conduct market research, evaluate, and improve our recruiting process,• Performing human resource functions, including processing job applications, administering benefits, processing payroll, conducting analytics in an employee context, or managing other aspects of an employment relationship including, but not limited to, the establishment, maintenance, and termination of employment relationships.• Determining eligibility for initial employment, including the verification of references and qualifications.• Processing background checks of new applicants and existing Employees.• Managing the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence, and maintenance of emergency and beneficiary contact information.• Processing work-related claims (e.g., worker compensation, insurance claims, etc.).• Conducting training, taking disciplinary action, addressing injuries, and other employment related incidents.• Providing a safe work environment.• Administering our occupational safety and health programs.• Assisting you with obtaining immigration or work documentation, when required.• Maintaining internal directories.• For employee-related programs, including surveys and voluntary programs.• Investigating and responding to claims against us.• For corporation transactions, such as transferring personal information in the event we sell or transfer, or are considering selling or transferring, all or a portion of our business or assets. |
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| Protected Classification Characteristic under California or Federal Law | Race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation | <p>We may use this Personal Information for the following purposes:</p> <ul style="list-style-type: none"> • for research and analytics, • to report on diversity and inclusion, • to participate in studies and research project, and • to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act (EEOC) and California’s Fair Employment and Housing Act. |
| Commercial Information | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | <p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • to reimburse employees for business related expenses for travel, lodging and other approved expenses. |
| Sensory Data or Surveillance Data (Audio, visual, electronic data) | Personal likeness, voice, images, pictures, recordings, information related to a company issues device. | <p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • protect the safety and security of our facilities and personnel through video surveillance, and • communicate and receive messages with employees. |
| Professional or Employment Related Information | Employment history, employment verification information, promotions, service dates, training information, length of service, compensation, tax information, bank account data, current department/position, employment status, job performance, attendance records, disciplinary actions, recordings of customer servicing calls, relocation information, employee development information, payroll information, or other employment-related information. | <p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • evaluate your qualifications for ongoing employment or promotions, • conduct conflicts checks, • comply with our recordkeeping obligations and policies, • demonstrate your agreement to, or acceptance of documents presented, or acceptance of documents presented to you, • Performing human resource functions, including processing job applications, administering benefits, processing payroll, conducting analytics in an employee context, or managing other aspects of an employment relationship including, but not limited to, the establishment, maintenance, and termination of employment relationships. • Determining eligibility for initial employment, including the verification of references and qualifications. • Processing background checks of new applicants and existing Employees. • Managing the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence, and maintenance of emergency |

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| | | <p>and beneficiary contact information.</p> <ul style="list-style-type: none"> • Processing work-related claims (e.g., worker compensation, insurance claims, etc.). • Conducting training, taking disciplinary action, addressing injuries, and other employment related incidents. • Assisting you with obtaining immigration or work documentation, when required. • Maintaining internal directories. • For employee-related programs, including surveys and voluntary programs. • Investigating and responding to claims against us. • For corporation transactions, such as transferring personal information in the event we sell or transfer, or are considering selling or transferring, all or a portion of our business or assets. |
| Education Information | Information such as education verification information, level of education, training and degrees received, or certifications. | <p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • evaluate an employee’s initial qualifications for employment and ongoing qualification for promotions; • evaluate an employee’s compliance with applicable licensing and regulatory requirements; and • evaluating an employee’s compliance with ongoing training or certification requirements. |
| Inferences drawn from Personal Information | Information to create a profile about your performance which may reflect your professional development goals and preferences, characteristics, behavior, attitudes, intelligence, abilities, and aptitudes. | <p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • evaluate an employee’s initial qualifications for employment and ongoing qualification for promotions. • to make compensation determinations with respect to an employee. |
| Sensitive Personal Information | Social Security or other state identification number; financial account numbers and documents permitting access to direct your pay to listed accounts, racial or ethnic origin, religious affiliation, the contents of and email, or text messages, unless our Company is the intended recipient of the communication. | <p>We may use this Personal Information as described above under Identifiers and Protected Classifications.</p> <p>Employees voluntarily provide their gender and ethnicity and may limit our use and disclosure of this information by electing not to provide it during the initial application stage.</p> |

Other Purposes Potentially Applicable to Any Categories of Personal Information Listed Above

We may also use your Personal Information and Sensitive Personal Information to facilitate administrative and other service functions, information technology and security operations, corporate transactions, and for legal reasons. These functions may include:

- to manage or respond to litigation, legal disputes or inquiries involving us; and to meet legal and regulatory requirements,
- to protect you, the integrity of your information, our company, assets, and any individual or entity we feel, in our discretion, is at risk of being harmed,
- in connection with a corporate transaction, sale, assignment or transfer of assets, merger, divestiture, or other change of control of our Company or any of its subsidiaries, joint ventures, or affiliates; and
- to manage licenses, permits and authorizations applicable to our business operations.

Disclosure of Personal Information for a Business Purpose

We disclose Personal Information a variety of different contexts to the categories of recipients as described below.

- **Third Parties You Authorized to Disclose Your Information.** During the course of your employment, we may need to disclose your information to selected third parties to run our business or comply with employment related obligations. You may need to disclose your name, contact information, employee number, or title to perform essential functions related to your position.
- **Technology Providers.** We may disclose your Personal Information to Technology Providers who are helping to ensure security and integrity to the extent the use of the your Personal Information is reasonably necessary and proportionate for these purposes. We may also disclose when debugging to identify and repair errors that impair existing intended functionality or while undertaking internal research for technological development and demonstration.
- **Service Providers, Vendors, or Contractors.** We may disclose your Personal Information with service providers or contractors, or they may disclose, store, access, transfer, or otherwise collect your information on our behalf related to your employment. We require service providers or contractors to implement reasonable organizational controls to maintain the privacy and security of information provided to them.
- **Marketing and Marketing Analytics.** We do not sell or share your information for cross context behavioral advertising. We may disclose information with third parties for marketing purposes, analytics, (ex: Adobe Analytics) and to jointly market products, services, promotions, and events. We may receive your Personal Information from a third party you authorized to share or sell your information. We may provide you with opportunities to partner with certain third-party organizations.
- **When you connect to social media pages or forums.** We may provide opportunities for you to publicly post reviews, questions, comments, or suggestions, which may include Personal Information, such as your name or username. Social media websites are governed by their own privacy policies. Anything you disclose in a public forum is public, so think carefully before you decide to disclose.
- **Government, Regulatory, and Legal Entities.** We disclose information to government, regulatory, and legal entities to respond to their inquiries, enforce our terms and conditions, exercise or defend a claim or if we determine disclosure is necessary or appropriate to protect the life, safety, or property of ourselves or others.
- **Other Business Purposes.** We may disclose your Personal Information when performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.

Your Rights and How to Exercise Your Rights

CCPA requires we create a way for eligible California residents to exercise their rights under CCPA, and to fulfill those consumer privacy rights regarding their Personal Information. These rights include the:

1. right to know your Personal Information,
2. right to delete Personal Information collected from you,
3. right to opt-out of the sale or sharing of Personal Information (if applicable),
4. right to non-discriminatory treatment or no retaliation for exercising any rights,
5. right to correct inaccurate Personal Information; and
6. right to limit use and disclosure of sensitive Personal Information.

To exercise any right please use complete the request form [here](#). We must verify your identity before we process any request. We may ask for your name, address, social security number, telephone number and/or information related to your employment to verify your identity. If we require additional information to verify your identity, you will receive an email from a member of our privacy team. If we are unable to verify your identity, then we will not be able to fulfill your request.

Additionally, we may not fulfill a request in accordance with applicable exemptions under state and federal laws or regulations where we are not required to do so.

California law permits California residents to use an authorized agent to make privacy rights requests. We require any such authorized agent to provide us with proof of the California resident's written permission (for example, a power of attorney) that shows the

authorized agent has the authority to submit a request for the California resident. An authorized agent must follow the process described above to make a request. The authorized agent must also verify his/her own identity. We will confirm the agent's authority with the California resident about whom the request was made.

You may also submit a request by emailing: privacy@rate.com or calling 866-934-7283

Information You Provide About Other Individuals

When you provide us with Personal Information about any other individual (e.g., beneficiary, dependent, emergency contact, etc.) as a part of completing certain enrollment documents related to your employment, it is your responsibility to inform other individuals of this Employee Privacy Notice prior to providing their Personal Information to us. If you are a parent or guardian of a minor who is your dependent, you consent to our and our third-party benefits administrators' collection and use of such minor's Personal Information for purpose of including them within your medical and financial benefits elections and providing services to them. If you do not consent, you may always change your dependent's information in Okta. If you need assistance with this, please contact benefits@rate.com.

We will not contact any third-party individuals listed in your employment for a purpose inconsistent with the purpose for which it was collected. We may contact your emergency contact in the event of an emergency. We will not sell, share, or send marketing and advertising communication to any third party you list in connection with your employment.

Retention of your Personal Information

We retain your Personal Information throughout the term of your employment with us and thereafter only for as long as required to fulfil the purposes for which it was collected. However, in some circumstances we may retain Personal Information for longer periods of time, for instance when we are required to do so in accordance with legal, regulatory, tax, and accounting requirements.

Change of Control

Notwithstanding any privacy notice, disclosure, or agreement which list information to the contrary, we may disclose, receive, or transfer your Personal Information in connection with a sale, merger, acquisition, dissolution, divestiture, joint venture, bankruptcy, or any similar transaction where the control and responsibility of your information changes to or from us.

Changes to this Notice

We will review and revise this Employee Privacy Notice on an annual basis or at our discretion. Updates to this Employee Privacy Notice take effect at the time of posting. Your continued employment after such changes take effect will constitute your consent to such changes.

Contact Us

For Questions about this Employee Privacy Notice, questions about privacy generally, please contact us by:

Email: privacy@rate.com

Phone: 866-934-7283

Mailing Address: Guaranteed Rate, Inc.

Re: Premia Mortgage, LLC

Attn: Privacy team

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