

California Job Applicant Privacy Notice

June 23, 2023

Scope and Overview

This Privacy Notice describes how Premia Mortgage, LLC, dba Premia Relocation Mortgage (“Premia Mortgage, LLC”, the “Company”, “we” or “us”) collect and process personal information about California Residents during the application and recruitment process. This Privacy Notice applies solely to job applicants of Premia Mortgage, LLC who reside in the State of California (“consumers” or “you”). 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.

This Privacy Notice describes the categories of personal information that we collect, how we use your personal information how we secure your personal information, and when we may disclose your personal information to third parties. We will only process your personal information in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

Collection of Personal information

What is Personal Information?

For purposes of this Privacy Note, “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 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.

For purposes of this Privacy Notice, personal information means any information about an identifiable individual collected in connection with the job applicant and recruitment process. Premia Mortgage, LLC may collect personal information directly from you, as a job applicant, or may receive personal information from third parties, for example, in connection with a background, employment, or reference check, subject to your consent where required by law. Personal information excludes anonymous or de-identified data that is not associated with a particular individual.

We may collect, store, and process the following categories of personal information in connection with our recruiting activities:

- Information contained in your application form/resume/cover letter, including your name, title, contact details, employment history, experience, skills, qualifications/training (including educational, vocational, driving licenses where appropriate), referees' names and contact details, etc.
- Publicly available information about you, such as your business social media presence (including any of photographs of you posted to such site(s)).
- Selection information, including correspondence, interview notes, internal notes, the results of any written or online selection tests.
- Equal opportunities monitoring data which could include information about your race or ethnicity, religious beliefs, sexual orientation or health. We only use this information to monitor equality of opportunity and diversity in our recruitment process.
- Information relevant to any request by you for accommodations to the recruitment process as a result of an underlying medical condition or disability. We may use this information to enable us to carry out a fair, non-discriminatory recruitment process by considering/making reasonable adjustments to our process as appropriate.
- Any additional personal details that you otherwise voluntarily provide to us.

If a conditional offer of employment is extended to you, we may collect, hold and use the following additional types of personal information about you:

- Pre-employment check information, including references and verification of qualifications.
- Right to work checks and related documents.
- Driving test results/driver motor vehicle records (if applicable to proposed line of work)
- Criminal records information (if applicable to your line of work). We use this information to assess your suitability for the role and verify information provided by you.
- Any additional personal details that you otherwise voluntarily provide to us (including personal information provided on your resume).

In particular, the following categories of personal information from California applicants may be collected. Though not all categories apply to an individual or applicant, the summary purposes and uses for the information we collect are also listed.

CATEGORY	EXAMPLES	COLLECTED?
Identifiers and Professional or Employment-Related Information	<p>A real name, alias, or preferred name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, government identification such as driver's license number, passport number, or other similar identifiers.</p> <p>Professional or Employment Related Information: membership in professional organizations, professional certifications, licensure information, portfolio, and employment history (including, name of past employers, dates employed, and job title).</p>	<p>Yes</p> <p>We may use this Personal Information to:</p> <ul style="list-style-type: none"> • evaluate an applicant's qualifications for employment, • 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, • demonstrate applicants' agreement to, or acceptance of documents presented to them, or acceptance of documents presented to them, and • conduct market research, evaluate, and improve our recruiting process.
Sensitive Personal Information	Gender and Ethnicity	<p>Yes</p> <p>We may use this Personal Information as described below, under Protected Classifications, where:</p> <p>Applicants voluntarily provide their gender and ethnicity.</p> <p>Applicants may limit our use and disclosure of this information by electing not to provide it.</p>
Protected classification characteristics under California or federal law. We collect this category of	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status,	<p>Yes</p> <p>We may use this Personal Information for the following purposes:</p>

<p>Personal Information on a purely voluntary basis, except where collection is required by law, and use the information only in compliance with applicable laws and regulations.</p>	<p>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).</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.
<p>Commercial Information</p>	<p>Products and services related to food, lodging and transportation.</p>	<p>Yes</p> <p>We may use this Personal Information for:</p> <ul style="list-style-type: none"> • us to reimburse applicants for expenses related to travel, lodging and other approved expenses.
<p>Biometric Information</p>	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans.</p>	<p>No</p>
<p>Internet or other similar network activity</p>	<p>We collect an applicant’s browsing history, interactions with our website, search history, device level data, online or mobile activity data and other information when visiting our websites or downloading any of our mobile apps, emails computer systems, devices, or advertisements, internet protocol (IP) address,</p>	<p>Yes</p> <p>We may use this Personal Information for:</p> <ul style="list-style-type: none"> ▪ Communicating with you ▪ Protect against fraud, security, and business risks ▪ Advertising, marketing and recommendations about our services ▪ Conduct analytics, research and improving our website, and ▪ Carrying out legal and business purposes.

	cookies, beacons, pixel tags, mobile ad identifier, or similar unique identifiers, including browsing or search history.	
Geolocation Data	Device location, IP address, physical location.	Yes We may use this Personal Information for: <ul style="list-style-type: none"> ▪ Performing services ▪ Marketing our services ▪ Research and development ▪ Quality assurance ▪ Security/Fraud ▪ Debugging ▪ Complying with our legal obligations
Sensory or Surveillance, Audio and Visual Information	Audio, electronic, visual or similar information (e.g. Footage from video surveillance cameras in and around our offices, and voicemail recordings.)	Yes We may use this Personal Information for: <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 applicants.
Profile Data	Inferences drawn from Personal Information to create a profile about in applicant reflecting applicant's intelligence, abilities, aptitudes, or characteristics/behavior.	Yes We may use this Personal Information to: <ul style="list-style-type: none"> • evaluate an applicant's qualifications for employment with our company and the specific position applied for.
Education information, Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification	Yes We may use this Personal Information to: <ul style="list-style-type: none"> • evaluate applicants' qualifications for employment.

	codes, student financial information, or student disciplinary records.	
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Use of Personal information

We only process your personal information where applicable law permits or requires it in connection with carrying out our application and recruitment process. We may process your personal information for the following legitimate business purposes:

- Identifying and evaluating job applicants, including assessing skills, qualifications, and interests.
- Verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.
- Communicating with you about the recruitment process and your application.
- Keeping records related to our hiring processes.
- Creating and submitting reports as required by applicable laws or regulations.
- To comply with our legal, regulatory, or other corporate governance requirements.
- Analyzing and improving our application and recruitment process.
- Complying with applicable laws, regulations, legal processes, or enforceable government requests.
- To protect the rights and property of Premia Mortgage, LLC, other job applicants, employees, or the public, as required or permitted by law.

In addition to using your personal information for the position for which you have applied, we may retain and use your personal information to inform you about and consider you for other positions that may be appropriate for you. If you do not want to be considered for other positions or would like us to remove your personal information, you may contact our data protection officer in writing or by e-mail.

We will only process your personal information for the purposes for which we collected it. If we need to process your personal information for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal information without your knowledge or consent where required by applicable law or regulation.

We may also process your personal information for our own legitimate interests, including for the following purposes:

- To prevent fraud.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- To support internal administration with our affiliated entities.

Where we have a legitimate need to process your personal information for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

Data Sharing

We do not sell, rent, or otherwise disclose personal information we collect to third parties for monetary or other valuable considerations. We will only disclose your personal information to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the recruitment process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal information consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes in accordance with our instructions.

We may also disclose your personal information for the following additional purposes where permitted or required by applicable law:

- To a recruiting firm to assist in our recruiting efforts.
- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to administer the application and recruitment process.
- As part of our regular reporting activities to other members of our group of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal information necessary for the specific purpose and circumstances.
- To protect the rights and property of Premia Mortgage, LLC.
- During emergency situations or where necessary to protect the safety of persons.
- Where the personal information is publicly available.
- For additional purposes with your consent where such consent is required by law.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal information against accidental loss and unauthorized access,

use, alteration, or disclosure. In addition, we limit access to personal information to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

Retention of your Personal Information and Sensitive Personal Information

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

If you are offered and accept employment with Premia Mortgage, LLC, the personal information we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal information policies.

Changes to This Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any updates. If we would like to use your previously collected personal information for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal information for a new or unrelated purpose. We may process your personal information without your knowledge or consent where required by applicable law or regulation.

Contact Us

For Questions about this California Applicant Privacy Notice or questions about privacy generally, please contact us by:

Email: privacy@rate.com

Phone: 866-934-7283

Mailing Address: Guaranteed Rate, Inc.

Attn: Privacy Compliance Officer

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